



MISSISSIPPI POWER & LIGHT COMPANY

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April 19, 1984

JAMES P. MCGAUGHY, JR.
VICE PRESIDENT

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
License No. NPF-13
File: 0260/L-860.0
GGNS Technical Specification
Review Program - Completion
Report
AECM-84/0229

Mississippi Power & Light Company (MP&L) has completed its review of the Grand Gulf Nuclear Station (GGNS) Technical Specifications in accordance with the program submitted to the NRC by AECM-84/0183, dated March 18, 1984. A report on the review program was submitted by AECM-84/0217, dated April 9, 1984. This letter documents the completion of the Technical Specification Review Program and presents the final Program Completion Report.

The Program Completion Report documents that a thorough and in-depth engineering, operations, and licensing review of the GGNS Technical Specifications was conducted in accordance with all programmatic commitments. Twenty-three (23)* priority 1 findings having potential safety significance were discovered and submitted as proposed changes to the Operating License. The remaining findings have minimal or no safety significance. The majority of the changes associated with these lower priority findings pertain to corrections of errors and incorporation of enhancements or clarifications to facilitate the implementation and clear understanding of the GGNS Technical Specifications. These remaining findings will be submitted, as appropriate, as proposed changes to the Operating License on a schedule mutually agreed to with the NRC Staff.

The scope of the review and the nature of the results provide a high degree of confidence that the GGNS Technical Specifications in all material respects accurately and adequately reflect the underlying design analyses and the as-built plant. By incorporating the above noted priority 1 changes, the GGNS Technical Specifications can be relied upon to support safe plant operations at full power.

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*One additional item (TSPS 034) is carried as a priority 1 item for tracking purposes and does not represent a Technical Specification change.

Member Middle South Utilities System

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AECM-84/0229

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The Program Completion Report is enclosed for your review.

Yours truly,

L. F. Dal
for J. P. McGehee

JPM:cdm

Attachments - Program Completion Report

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TECHNICAL SPECIFICATION REVIEW PROGRAM

PROGRAM COMPLETION REPORT

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A. TECHNICAL SPECIFICATION PROBLEM SHEETS (TSPS)

The Technical Specification Review Program (TSRP) generated 165 Technical Specification Problem Sheets (TSPS) which document the findings discovered during the review. In addition, 240 TSPS were prepared which document the results of previous reviews. Table 1 provides information on the sources of all 405 TSPS.

All TSPS were assigned a priority (either 1, 2, or 3) in accordance with the definitions given in Attachments A, B, and C. Each priority category was further divided into subcategories, as indicated in these attachments. Priority 1 is applied to TSPS which documented situations where the existing Technical Specification was non-conservative with respect to the FSAR or other supporting design or licensing documents. There were no priority 1A items discovered during this or previous reviews. Generally, priority 1 was assigned to TSPS requiring short term resolution. In particular, priority 1B and 1C items require resolution to permit a restart to 5% rated power or to permit exceeding 5% rated power, respectively.

Priority 2 items generally require resolution in the mid-to-long term. Priority 2 items are substantially less important than priority 1 items and have minimal or no safety significance; further, within priority 2 there is a wide range of relative importance among the subcategories 2A through 2I.

Priority 3 items require no change to the Technical Specifications but may require changes to other documents, e.g. FSAR.

The Review, Prioritization, and Direction (RPD) group had sole authority to determine and assign priorities to the TSPS. RPD consisted of a group of engineers and technicians who have broad experience in GCNS design, testing, operations, engineering, and licensing. Each TSPS was reviewed and a priority assigned by applying objective attributes of the priority definitions and engineering judgement to the TSPS situation under discussion. Priority assignments resulted from discussion and concurrence among the RPD members.

The priority scheme is useful since it describes the relative importance and safety significance of the findings documented on the TSPS. Table 2 presents a breakout count by priority of both total TSPS and TSPS from this review. Table 3 provides an index by priority classification of TSPS resulting from this review; Table 4 presents the same information as Table 3 for all TSPS.

Figure 1 provides a distribution by priority of all TSPS generated from this and previous reviews. This figure shows that priority 1 TSPS make up about 6% of the total TSPS population. Priority 2 items dominate the distribution accounting for about 71% of the total population. Priority 3 and resolved TSPS make up about 23% of the grand total.

Figure 2 focuses on the distribution by priority of TSPS generated during this effort. Priority 1 items are about 5% of this smaller population. Priority 2 items are about 64%, and priority 3 items are about 31% of the population.

The following conclusions can be drawn from these data distributions:

- o Priority 1 items constitute a small fraction of total documented findings. Priority 1 is assigned to potentially safety significant items, and, therefore, few items of potential safety significance were found.

Attachment D summarizes all priority 1B and 1C TSPS and briefly discusses their safety significance. All priority 1 TSPS have been formally submitted to the NRC as proposed changes to the Operating License.*

Figures 3 and 4 focus on the distribution of all priority 1 items and priority 1 items resulting from this review, respectively. Note that no priority 1A items were found during this or previous reviews. A priority 1A item, if discovered, would have represented a significant safety concern in the design, construction, or safety analyses of GCNS.

- o Priority 2 items dominate the distribution of findings. Priority 2 describes items with minimal or no safety significance leading to the conclusion that most of the findings deal with minor items - primarily corrections for clarity, to enhance plant availability, or to reduce undue transients or safety system challenges.

Figure 5 shows a more detailed distribution by subcategory of all priority 2 items generated to date. Figure 6 shows the same distribution for only those items found during this review. These figures are useful in understanding the range of importance of the dominating priority 2 findings.

From these distributions of priority 2 findings the following conclusions can be made:

- o Less than 2% of all priority 2 items fall in subcategory 2A. TSPS with priority 2A relate to conditions which could cause unnecessary challenges to safety systems, which could cause unnecessary plant transients, or which are needed to enhance plant safety. Thus, 2A items are the most important of all priority 2 findings and their number is small.
- o Priority 2B and 2D TSPS dominate the priority 2 population. Priority 2B items are about 31% of the total population; priority 2D items are about 37% of the total population.

Generally 2B items document errors or ambiguous Technical Specifications which can be managed by administrative controls to ensure conservative operations with respect to Technical Specifications. Priority 2D items document typographical or other editorial changes and enhancements which clarify the meaning and use of Technical Specifications.

*One additional item (TSPS 034) is carried as a priority 1 item for tracking purposes and does not represent a Technical Specification change.

- o Priority 2E items are the third-most dominant fraction of the priority 2 TSPS. Priority 2E items make up about 16% of the population. Most of these TSPS relate to administrative clarifications and corrections needed as a result of reviewing Section 6.0 of GGNS Technical Specifications.
- o Priority 2C and 2F items make up about 1% and 3% of the priority 2 population, respectively. Priority 2C and 2F describe items which, if changed, can provide more flexibility in plant operations and improve plant availability.
- o Priority 2G and 2H, combining for 7% of the population, describe potential Technical Specification changes which will be needed prior to implementation of future design changes or to extension of plant operating limits.

Figures 7 and 8 provide more detail regarding the distribution of priority 3 TSPS. Priority 3A items document findings or comments which require no Technical Specification changes. Priority 3A items make up about 17% of all priority 3 items. Priority 3B items, which document mostly FSAR changes required as a result of the Technical Specification review, account for about 83% of all priority 3 items. The significance of the FSAR changes is discussed in Section D of this report.

In summary, considering all review findings documented for TSPS, the following points should be noted:

- o There are no priority 1A items.
- o There is a relatively small number of priority 1B and 1C items with potential safety significance, should they remain uncorrected. However, all of the priority 1B and 1C items have been submitted as proposed changes to the Operating License.*
- o Priority 2 items dominate the population of TSPS, and the majority of priority 2 items are 2B and 2D TSPS which document errors and confusing Technical Specifications, typographical errors, or editorial changes, all amenable to administrative controls.
- o The majority of priority 3 items pertain to instances in which FSAR changes are required or recommended to render the FSAR consistent with the Technical Specifications in the affected areas.

*See note on previous page regarding TSPS 034.

B. COMPOSITE CONSISTENCY MATRIX - DEVELOPMENT

A matrix of Technical Specification Review Program results was constructed to evaluate the consistency of GGNS Technical Specifications with the FSAR, SER, STS, as-built plant, and other areas of Technical Specifications (internal consistency). The matrix includes an additional column of data, "Other", for inconsistencies which were not applicable to the other categories.

The matrix was constructed after all Lead Review Organizations (LROs) had completed their reviews of their assigned portions of GGNS Technical Specifications. The LROs consisted of GE, Bechtel, MP&L's Administrative Review Group, and MP&L's Radiological and Effluent Technical Specification Review Group. The LROs were asked to search their review packages and TSPS and document all inconsistencies noted between GGNS Technical Specifications and the FSAR, STS, SER, as-built plant, and other areas of Technical Specifications. To ensure unbiased, unfiltered input, consistency was defined as:

The intent of the Technical Specification and the comparison documents are in general agreement and convey the same meaning. Wording differences that do not alter the intent are not considered inconsistencies.

The input data was reviewed by a group consisting of the:

- Project Manager
- NSSS/BOP Manager
- NSSS Manager
- BOP Manager
- GE NSSS Onsite Representative
- Bechtel BOP Onsite Representative
- RPD Manager
- SRO Representative
- NPE Representative

The raw data were screened by the review group in accordance with the following ground rules and a composite consistency matrix of results was created:

- o If the GGNS Technical Specification meets or exceeds the requirements of the STS, then the discrepancy between the documents is not to be considered an inconsistency.
- o If the identified item is only a requested change for clarity such as typos, misspelled words, etc. that do not alter the meaning or interpretation of the Technical Specification, then it is not an inconsistency.
- o If the identified item is the result of future changes or analyses requested by MP&L to allow more operating margin and would normally be handled by standard methods of changing Technical Specifications, then it is not an inconsistency.

- o If the Technical Specifications have already been amended via the normal Technical Specification change process, then it is not an inconsistency.
- o In some cases there were differences between the Standard Technical Specifications and GGNS Technical Specifications but the GGNS Technical Specifications accurately reflect the approved GGNS design. These differences were not considered as inconsistencies.
- o Setpoint changes and minimum operable channel changes were categorized as "as-built" inconsistencies.
- o FSAR inconsistencies were eliminated if: 1) corrected or clarifying information had been provided previously to the NRC by a formal letter; or 2) the inconsistency was caused by an implemented design change package.
- o The Technical Specification vs. SER review was commensurate with the detail to which the Technical Specification addressed the subject of interest. (An independent review of FSAR inconsistencies for SER impact was done and is discussed later in this report).
- o Consistency (C) was denoted in any category where the Technical Specification was compared and no inconsistency was identified.

The preliminary composite consistency matrix was subjected to review and comment by the LRO's. In addition, RPD reviewed all TSPS against the matrix to ensure all appropriate findings were included. Revision 2 of the composite consistency matrix resulted from these internal reviews. Revision 2 was provided to the NRC in a meeting on April 4, 1984 and was formally transmitted to the NRC on April 9, 1984 (AECM-84/0217).

The NRC Staff, in a meeting April 9, 1984, requested an expanded matrix which showed the unfiltered LRO input. Attachment E was prepared in response to this request and represents the expanded matrix. Attachment E and its associated notes indicate how input from the LROs was handled in preparing the composite consistency matrix. In Attachment E the raw inputs, which were deleted from the composite consistency matrix, are shown as references in parenthesis to notes with numbers in the 300 - 414 range. A special set of explanatory comments are provided for the deleted items. Note numbers other than 300 - 414 in parenthesis represent the original column placement by the LRO. All notes, other than those numbered 300 - 414, are provided in Attachment F.

Also as a result of the meeting with the NRC on April 9, 1984, Revision 2 of the composite consistency matrix has been revised as follows:

- o A check was done of all inconsistencies, especially as-built, SER, and FSAR, to ensure the ground rules were consistently applied.

- o Information on safety significance for each item was included in the notes.
- o All TSPS generated as of April 17, 1984 which were applicable to the matrix were included.
- o Some editorial changes were made to the notes.

C. COMPOSITE CONSISTENCY MATRIX - DISCUSSION OF RESULTS

Attachment F presents Revision 4 of the composite consistency matrix and its associated notes. Also provided are special edits of the notes giving only those notes associated with:

- o FSAR inconsistencies
- o SER inconsistencies
- o As-built inconsistencies

Attachment G provides a tabulation of inconsistencies in each comparison category for each Technical Specification section. The data within each section are divided by priority with sub-totals and grand totals of all inconsistencies provided.

Figures 9 - 13 graphically present the data totals from Attachment G. Figure 9 shows the grand total of all inconsistencies in each comparison category. Figures 10 - 13 present the results for each Technical Specification section. Note that Section 1.0, Definitions, had no inconsistencies and, thus, no graph is provided.

Examining Figure 9, we have drawn the following conclusions:

- o Approximately 26% of the inconsistencies noted relate to FSAR vs. Technical Specifications. None of the FSAR changes are safety significant or would have altered the conclusions of the SER. The Technical Specification changes noted involve clarifications or additions of minor detail except in a few instances, such as the inconsistency described in Note 59 (7 vs. 8 ADS valves).
- o About 5% of the inconsistencies noted relate to the SER vs. Technical Specifications. The inconsistencies noted can be generally attributed to: 1) changes in analyses, organization, or procedures since SER, Supplement 4; or 2) inaccurate and unclear descriptions of GGNS systems in the SER. None of the inconsistencies altered the SER's overall conclusions.

- o Approximately 17% of the inconsistencies noted relate to STS vs. GGNS Technical Specifications. Generally, the differences noted with the STS result from the STS: 1) providing more detail in the level of Technical Specification presentation; 2) describing features not part of GG design; 3) recommending changes to be incorporated in the next RETS revision.
- o About 25% of the inconsistencies noted relate to as-built plant vs. Technical Specification. The 70 inconsistencies generally breakdown as follows:

As-built Documentation Differences	18
Setpoint Differences	13
Trip System Differences	7
Minimum Operable Channel Differences	7
Valve Table Differences	9
Fire Protection Hardware Differences	7
Leak Detection Differences	3
Snubber Differences	1
Other Hardware Differences	4
Other	1

- o About 7% of the inconsistencies relate to internal differences within the Technical Specifications. The small number of differences within Technical Specifications indicates that the Technical Specifications were adequately formatted and interrelated.
- o The remaining 19% of the inconsistencies fall within the "Other" category. Items in this category are not necessarily inconsistencies, but in general are enhancements to the Technical Specifications.

D. COMPOSITE CONSISTENCY MATRIX-EVALUATION OF FSAR INCONSISTENCIES

During the course of the TSRP effort, the FSAR was found to be inconsistent with the GGNS Technical Specifications, the SER, or the as-built plant in several cases. While the TSRP objectives did not specifically seek to determine the degree of FSAR accuracy, we have drawn certain conclusions from the number and type of FSAR inconsistencies identified. To gather the required information, all TSRP related FSAR changes were identified.

The total number of required FSAR changes was determined by a review of the consistency matrix. Each Lead Review Organization initially responsible for identifying the subject inconsistency was required to provide suggested FSAR changes and an evaluation of the significance of the item. Each item was screened in accordance with ground rules relating to FSAR/SER inconsistencies.

Evaluation of the FSAR inconsistencies led to formation of six major categories as the primary sources of FSAR inconsistencies. The approach for reducing this information employed judgement on the part of the evaluator. Categories were defined and revised in an iterative process as data were added during the course of the review. Inconsistencies with common aspects were grouped together with the intention of identifying potential trends and placing the data in a meaningful format. Generally, the final categories chosen were those with the highest population of FSAR changes. These categories are described in Table 5.

For the purposes of considering FSAR inconsistencies identified in the review, the overall results relating to the FSAR are presented in Table 6.

Prior to arriving at any general conclusions, the following information must be considered regarding the review and the raw data:

- o A typical Technical Specification section may contain up to several hundred discreet pieces of information that were reviewed for consistency with the FSAR and the as-built plant.
- o Some Technical Specification sections contained multiple findings which resulted in TSPS that were in some way associated with an FSAR inconsistency.
- o A single TSPS generally described a separate, distinct problem. However, in some cases, the same TSPS described a problem which applied to several Technical Specification sections.
- o In those cases where the FSAR inconsistency in the matrix was due to an inaccurate Technical Specification, no FSAR change was required or generated.

As shown in Table 6, some 55 Technical Specification sections were identified as having one or more FSAR inconsistencies. Considering the significant amount of information compared, there were relatively few FSAR related TSPS generated. For these sections, as discussed below, there was an average of about one TSPS generated per section exhibiting an FSAR inconsistency.

Excluding those 22 FSAR inconsistencies in which the FSAR was accurate and the Technical Specification required revision, there remain 56 TSPS where the FSAR was inaccurate. Except for the single issue discussed in a given TSPS, the associated Technical Specification section was, on the whole, consistent with the FSAR. It should also be noted that in all FSAR inconsistencies identified (i.e., the FSAR required revision), there were relatively few instances in which the FSAR inaccurately described the physical hardware of the as-built plant. In all these instances, the FSAR, not the physical plant, was inaccurate.

As discussed previously, the FSAR inconsistencies were grouped into six major categories. Table 7 presents the distribution of FSAR related TSPS in which the FSAR was determined to be inaccurate. (Category 6 items not included.) As stated earlier, the TSPS generally pertain to separate issues and are therefore, the best indicator of individual FSAR inaccuracies or ambiguities. Attachment H contains a master cross-reference between Technical Specification sections, their associated TSPS, and the assigned FSAR inconsistency category.

Table 7 shows that Categories 1, 2, and 4 contained the greatest number of items requiring FSAR revision. Category 1 pertains to setpoints and other parameters which were found to be inaccurately described in the FSAR. The principal cause for FSAR inconsistencies in this category is considered to be related to the placement of preliminary values for various parameters in the FSAR prior to the establishment of the final design values. This is consistent with the standard process of FSAR development. In 1980, recognizing the potential for significant inconsistency between the FSAR and the then-draft GGNS Technical Specifications, MP&L clarified the preliminary nature of FSAR setpoints in response to NRC Question 031.60 and, in fact, eliminated many setpoints from FSAR tables, predominantly in FSAR Chapter 7 (FSAR Amendment 44, 11/80). MP&L's response further directed the reader to the Technical Specifications for "actual" values of parameters described in the FSAR.

In all Category 1 items, the parameter in question was accurately described in the Technical Specification and was consistent with the as-built plant and design documentation. In that both FSAR Chapter 6 and 15 safety analyses used as input those values which are specified in design documentation, the presence of preliminary parameter values in the FSAR has no impact on the conclusions reached in the FSAR or SER. Furthermore, by virtue of the thorough nature of the TSRP, there is a high degree of confidence that Category 1 type inconsistencies have been identified, and proposed FSAR changes, where appropriate, have been initiated.

In regard to Category 2 items, many editorial inconsistencies resulted from the presence of the same or similar information in multiple FSAR sections. For example, in response to an NRC question or due to the normal design evolution, information may have been revised in the clearly affected FSAR sections but was not revised in other sections. Also contributing to Category 2 were those instances in which the most current design or licensing information was not reflected in the FSAR but was contained in Design Change Packages (DCP) or in formal correspondence between MP&L and the NRC. All Category 2 items are considered editorial in nature. None of these items were determined to have adverse impact on the FSAR's safety analyses or the conclusions of the SER.

MP&L's FSAR Update Program, which is not yet fully implemented, should aptly address the implications of Category 2 items. Key points in this regard are:

- o The Update Program calls for the systematic review of all implemented DCP's and MP&L letters to the NRC for potential FSAR impact.
- o The Update Program will incorporate pertinent information contained in the FSAR Question & Response (Q&R) sections into the FSAR text and delete the Q&R sections. This will virtually eliminate the Q&R sections as a source of inconsistencies.
- o At the core of the Update Program is a proven, computerized FSAR change tracking and processing system. This system provides for keyword sorting of the entire FSAR. This sorting capability provides a systematic approach to identifying FSAR sections impacted by a given document.

Category 3 items pertain to those instances in which the FSAR inaccurately described the physical hardware of the as-built plant. As shown in Attachment H, there were relatively few items in this category. None of these items altered the FSAR safety analyses or the associated conclusions of the SER or will result in a physical change to the plant. The inconsistencies in this category are discussed in more detail in Attachment I.

Category 4 items, pertaining to organizational or administrative matters, resulted largely from the numerous MP&L organizational changes over the last two years, which have not yet been reflected in the FSAR. In addition to implementing FSAR changes specific to the identified issues, extensive reviews are in progress to update, as necessary, FSAR Chapter 13 (and Chapter 18, as it pertains to these matters). FSAR changes from these reviews will be incorporated primarily in the next two FSAR amendments.

Lastly, Category 5 items covered miscellaneous subject areas. Due to their diverse subject areas, there are no relevant conclusions to be drawn from this data.

As noted earlier, all FSAR inconsistencies in each category are listed in Attachment H and are cross-referenced to the associated Technical Specification section and TSPS.

For all FSAR inconsistencies requiring a change to the FSAR, a safety evaluation was conducted according to department administrative procedures. This procedure's evaluation is based on the evaluation criteria of 10 CFR 50.59. In addition, for FSAR inconsistencies identified during the TSRP, consideration was given to each item regarding its implications to the NRC Staff's conclusions, as documented in the SER and its supplements.

The overall conclusions of the GE, Bechtel, and MP&L evaluations of the identified FSAR inconsistencies (where no Technical Specification revision was required) are that these inconsistencies:

- o do not require changes to the physical plant design,
- o do not require additional safety analyses to be conducted,
- o do not adversely impact the overall conclusions of affected SER sections, and
- o do not present a significant safety concern.

MP&L intends to incorporate all TSRP identified inconsistencies requiring FSAR changes into a May, 1984 amendment to the FSAR.*

* In those cases where the FSAR requires updating due to implemented design changes or formal correspondence with the NRC, the associated FSAR changes will be processed on a schedule consistent with the FSAR Update Program.

E. COMPOSITE CONSISTENCY MATRIX - ANALYSIS OF INCONSISTENCIES VS. TECHNICAL SPECIFICATION LINE ITEM

The data in the consistency matrix (Attachment F) were evaluated to determine the total number of inconsistencies for each Technical Specification line item. This analysis showed the following Technical Specifications had greater than 5 inconsistencies:

3/4.3.2	Isolation Actuation Instrumentation	(22 I's)
3/4.3.3	Emergency Core Cooling System Actuation Instrumentation	(13 I's)
3/4.3.7.1	Radiation Monitoring Instrumentation	(8 I's)
3/4.3.7.5	Accident Monitoring Instrumentation	(9 I's)
3/4.3.7.12	Radioactive Gaseous Effluent Monitoring Instrumentation	(5 I's)
3/4.5.1	ECCS - Operating	(8 I's)
3/4.8.1.1	A.C. Sources - Operating	(5 I's)
6.2.2	Unit Staff	(7 I's)

Additional detail on these inconsistencies is provided in Attachment J. Examining the list above, note that the first 5 of the above 8 Technical Specification line items deal with instrumentation. A review of Attachment J indicates some common inconsistencies relating to instrumentation:

- o changes to setpoints due to refined or new calculations
- o changes to calibration frequencies; usually more frequent calibrations to conform to vendor recommendations
- o clarifications of signals causing trip actions and definitions of trip channels
- o clarifications in defining minimum operable channels (MOC).

The inconsistencies against 3/4.5.1, ECCS Operating, relate to: 1) changes to the Bases, 2) setpoint changes to provide margin between high pressure alarms and pressure relief valve lift points, 3) adjustments to Surveillances on pump pressure/flow to state requirements on a consistent basis, 4) and a change to get GGNS Technical Specifications in complete conformance with supporting analyses for ADS operability.

The inconsistencies against 3/4.8.1.1, A.C. Sources - Operating, relate mainly to clarifications needed in FSAR and SER revisions.

The inconsistencies against 6.2.2, Unit Staff, relate to position title clarification, updating of organization charts, and a minor administrative clarification on required break times.

F. OVERALL CONCLUSIONS

The Technical Specification Review Program (TSRP) provided a detailed, comprehensive, and in-depth engineering, operations, and licensing evaluation of the GGNS Technical Specifications. The review was conducted in accordance with all program commitments and the results of the review are documented on TSPS. A scheme to assign priorities to the TSPS was developed and applied. The priority scheme is important in that it establishes the relative safety significance of the review findings.

Priority 1 items, those with potential safety significance, constitute a small fraction of the total documented findings. No priority 1A items representing items of significant safety concerns were found. All priority 1B and 1C items have been formally submitted to the NRC as proposed changes to the Operating License.*

The majority of findings relate to priority 2 items of minimal or no safety significance. There was a very small number of priority 2A items which represented conditions which could cause undue safety system challenges or plant transients. Most priority 2 items were priority 2B and 2D items which document errors, clarifications, enhancements, editorial changes, etc. which are needed to facilitate implementation and clear understanding of the GGNS Technical Specifications.

Most priority 3 items relate to FSAR changes needed to assure the FSAR and GGNS Technical Specifications conform. We conclude from our evaluation of the priority 3 items that they neither contain an unreviewed safety question nor alter any fundamental conclusion reached in the SER.

A matrix of TSRP results was prepared presenting inconsistencies between the GGNS Technical Specifications and FSAR, SER, STS, as-built plant, and other areas of the Technical Specifications, respectively. Comparisons between GGNS Technical Specifications and the FSAR, SER, and as-built plant are the most significant and of the most interest.

In regard to the comparison between the GGNS Technical Specifications and the FSAR, none of the inconsistencies are significant safety concerns. Considering the FSAR changes indicated, none would have altered the results of the SER. As for the necessary Technical Specification changes, they involve clarifications and additional details to make the GGNS Technical Specifications conform to the FSAR.

*One additional item (TSPS 034) is carried as a priority 1 item for tracking purposes and does not represent a Technical Specification change.

A small number of inconsistencies relate to GGNS Technical Specifications vs. SER. These differences are minor and do not alter any fundamental conclusions in the SER.

Generally, the as-built vs. GGNS Technical Specification inconsistencies have resulted or will result in requested Technical Specification changes intended to: 1) address instrumentation problems (setpoints, trip systems, MOC, etc.), 2) correct as-built documentation, or 3) add details to GGNS Technical Specifications relating to valves, fire protection systems, and other hardware.

An evaluation was conducted to determine the significance of the inconsistencies between the FSAR and the GGNS Technical Specifications and the implications, if any, regarding FSAR accuracy or conformance of the FSAR to the as-built plant. There were relatively few instances in which the FSAR inaccurately described the physical as-built plant. None of the differences was of significant safety concern or would have altered the fundamental conclusions of the SER. Furthermore, the TSRP provides additional confidence that MP&L's formal program of design control and verification, throughout the life of the Grand Gulf project, effectively controlled the configuration of the plant and the content of the FSAR.

On the basis of the results of the TSRP and considering the identified changes, MP&L concludes that the GGNS Technical Specifications accurately reflect the plant; the FSAR, as amended, and supporting documents; and the SER analyses, in all material respects. Taking all this together, the GGNS Technical Specifications can be relied upon to support safe plant operations at full power.

TABLES 1 & 2

TABLE 1

Sources of Tech Spec Problem Sheets	Number of TSPS Items
1. Items identified by MP&L at the 1/24/84 meeting with NRC	61
2. NRC Proof and Review Comments given to MP&L 1/24/84	37
3. Items formally submitted to NRC prior to 1/24/84 (received 6 in Amend. 12)	43

SUBTOTAL	141
4. Identified by NRR	1
5. NRC I&E Exit (2/24/84)	11
6. Additional Proof and Review Comments not previously submitted	11
7. PSRC	2
8. MP&L Review Team established to review LCO's/ACTION's	39
9. QA	1
10. LCTS (SER, Letters, FSAR, etc.)	10
11. Instrumentation Review per ICSB Commitment	10
12. Miscellaneous Technical Support identified items (primarily long-term issues and commitments)	14

SUBTOTAL	99
TOTAL:	240
13. Review Effort	
A. Tech Spec	132
B. FSAR/SER	33

SUBTOTAL	165
TOTAL:	405

TABLE 2

Date: April 16, 1984

Page 1 of 1

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Summary Report

=====

Total Number of Problem Sheets Generated to Date.....405

Total Number of Problem Sheets Generated From
the Technical Specification Review Effort.....165

Breakdown of Problem Sheets Generated:

PRIORITY	TOTAL	TSRP EFFORT
1A	0	0
1B	14	5
1C	10	3
2A	5	2
2B	88	42
2C	4	1
2D	107	35
2E	47	19
2F	9	2
2G	11	0
2H	9	0
2I	6	5
3A	14	3
3B	71	48
Resolved	10	0
TOTALS	405	165

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TABLE 3

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Problem Sheets Issued as a result of TSRP Effort

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Problem Sheet	Assignment	Current Revision
PRIORITY 1B		
292	1B	18, 4/02/84
293	1B	18, 4/02/84
306	1B	18, 4/02/84
308	1B	18, 4/02/84
344	1B	19, 4/05/84

TOTAL.....5

PRIORITY 1C

262	1C	16, 3/31/84
285	1C	18, 4/02/84
329	1C	18, 4/02/84

TOTAL.....3

PRIORITY 2A

309	2A	18, 4/02/84
310	2A	18, 4/02/84

TOTAL.....2

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING

Problem Sheets Issued as a Result of TSRP Effort

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Problem Sheet	Assignment	Current Revision
PRIORITY 2B		
244	2B	18, 4/02/84
245	2B	17, 4/01/84
246	2B	18, 4/02/84
247	2B	18, 4/02/84
250	2B	18, 4/02/84
257	2B	17, 4/01/84
259	2B	18, 4/02/84
264	2B	17, 4/01/84
266	2B	17, 4/01/84
267	2B	18, 4/02/84
271	2B	18, 4/02/84
273	2B	18, 4/02/84
275	2B	18, 4/02/84
277	2B	18, 4/02/84
284	2B	18, 4/02/84
294	2B	18, 4/02/84
297	2B	18, 4/02/84
299	2B	18, 4/02/84
303	2B	18, 4/02/84
307	2B	18, 4/02/84
312	2B	22, 4/09/84
313	2B	18, 4/02/84
314	2B	18, 4/02/84
315	2B	18, 4/02/84
316	2B	18, 4/02/84
321	2B	18, 4/02/84
323	2B	18, 4/02/84
330	2B	18, 4/02/84
331	2B	18, 4/02/84
333	2B	18, 4/02/84
335	2B	18, 4/02/84
338	2B	18, 4/02/84
342	2B	19, 4/05/84
345	2B	21, 4/08/84
346	2B	23, 4/10/84
347	2B	21, 4/08/84
350	2B	21, 4/08/84
357	2B	21, 4/08/84
359	2B	21, 4/08/84
360	2B	21, 4/08/84
364	2B	21, 4/08/84
372	2B	25, 4/16/84

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TECHNICAL SPECIFICATION REVIEW

PROBLEM SHEET LISTING

Problem Sheets Issued as a Result of TSRP Effort

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Problem Sheet

Assignment

Current Revision

TOTAL.....42

PRIORITY 2C

253

2C

18, 4/02/84

TOTAL.....1

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Problem Sheets Issued as a Result of TSRP Effort

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Problem Sheet	Assignment	Current Revision
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PRIORITY 2D

241	2D	17, 4/01/84
248	2D	18, 4/02/84
249	2D	22, 4/09/84
263	2D	17, 4/01/84
265	2D	18, 4/02/84
269	2D	18, 4/02/84
272	2D	22, 4/09/84
274	2D	18, 4/02/84
276	2D	18, 4/02/84
278	2D	18, 4/02/84
279	2D	17, 4/01/84
280	2D	18, 4/02/84
286	2D	18, 4/02/84
287	2D	18, 4/02/84
288	2D	18, 4/02/84
302	2D	18, 4/02/84
304	2D	21, 4/08/84
334	2D	18, 4/02/84
336	2D	18, 4/02/84
337	2D	18, 4/02/84
343	2D	19, 4/05/84
349	2D	21, 4/08/84
351	2D	21, 4/08/84
352	2D	21, 4/08/84
353	2D	21, 4/08/84
354	2D	21, 4/08/84
355	2D	21, 4/08/84
356	2D	21, 4/08/84
358	2D	21, 4/08/84
361	2D	21, 4/08/84
362	2D	21, 4/08/84
363	2D	21, 4/08/84
365	2D	24, 4/13/84
366	2D	24, 4/13/84
371	2D	24, 4/13/84

TOTAL.....35

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING

Problem Sheets Issued as a Result of TSRP Effort

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Problem Sheet

Assignment

Current Revision

PRIORITY 2E

255	2E	18, 4/02/84
256	2E	18, 4/02/84
270	2E	22, 4/09/84
281	2E	18, 4/02/84
282	2E	17, 4/01/84
283	2E	17, 4/01/84
289	2E	18, 4/02/84
290	2E	18, 4/02/84
295	2E	18, 4/02/84
296	2E	18, 4/02/84
298	2E	18, 4/02/84
301	2E	18, 4/02/84
311	2E	18, 4/02/84
317	2E	18, 4/02/84
319	2E	21, 4/08/84
320	2E	18, 4/02/84
322	2E	18, 4/02/84
324	2E	18, 4/02/84
348	2E	21, 4/08/84

TOTAL.....19

PRIORITY 2F

251	2F	18, 4/02/84
268	2F	18, 4/02/84

TOTAL.....2

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Problem Sheets Issued as a Result of TSRP Effort

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Problem Sheet	Assignment	Current Revision
PRIORITY 2I		
305	2I	18, 4/02/84
325	2I	18, 4/02/84
326	2I	18, 4/02/84
339	2I	18, 4/02/84
340	2I	18, 4/02/84

TOTAL.....5

PRIORITY 3A

261	3A	18, 4/02/84
300	3A	18, 4/02/84
370	3A	24, 4/13/84

TOTAL.....3

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TECHNICAL SPECIFICATION REVIEW

PROBLEM SHEET LISTING

Problem Sheets Issued as a Result of TSRP Effort

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Problem Sheet

Assignment

Current Revision

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PRIORITY 3B

242	3B	18, 4/02/84
243	3B	18, 4/02/84
252	3B	18, 4/02/84
254	3B	18, 4/02/84
258	3B	18, 4/02/84
260	3B	18, 4/02/84
291	3B	18, 4/02/84
318	3B	18, 4/02/84
327	3B	18, 4/02/84
328	3B	18, 4/02/84
332	3B	21, 4/08/84
341	3B	18, 4/02/84
367	3B	24, 4/13/84
368	3B	24, 4/13/84
369	3B	24, 4/13/84
800	3B	18, 4/02/84
801	3B	18, 4/02/84
802	3B	18, 4/02/84
803	3B	18, 4/02/84
804	3B	18, 4/02/84
805	3B	24, 3/13/84
806	3B	18, 4/02/84
807	3B	18, 4/02/84
808	3B	18, 4/02/84
809	3B	18, 4/02/84
810	3B	18, 4/02/84
811	3B	18, 4/02/84
812	3B	23, 4/10/84
813	3B	22, 4/09/84
814	3B	22, 4/09/84
815	3B	22, 4/09/84
816	3B	23, 4/10/84
817	3B	23, 4/10/84
818	3B	23, 4/10/84
819	3B	23, 4/10/84
820	3B	23, 4/10/84
821	3B	24, 4/13/84
822	3B	24, 4/13/84
823	3B	24, 4/13/84
824	3B	24, 4/13/84
825	3B	24, 4/13/84
826	3B	25, 4/16/84

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Problem Sheets Issued as a Result of TSRP Effort

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Problem Sheet	Assignment	Current Revision
827	3B	25, 4/16/84
828	3B	25, 4/16/84
829	3B	25, 4/16/84
830	3B	25, 4/16/84
831	3B	25, 4/16/84
832	3B	25, 4/16/84

TOTAL.....48

TABLE 4

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
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PRIORITY Resolved

080 ¹	Resolved	15, 3/29/84
113 ²	Resolved	15, 3/29/84
117 ²	Resolved	18, 4/02/84
121 ²	Resolved	15, 3/29/84
125 ²	Resolved	18, 4/02/84
130 ²	Resolved	15, 3/29/84
135 ²	Resolved	18, 4/02/84
186 ³	Resolved	18, 4/02/84
188 ⁴	Resolved	15, 3/29/84
230 ⁵	Resolved	15, 3/29/84

TOTAL.....10

PRIORITY 1B

001	1B	15, 3/29/84
005	1B	15, 3/29/84
015	1B	17, 4/01/84
016	1B	15, 3/29/84
033	1B	18, 4/02/84
054	1B	21, 4/08/84
076	1B	18, 4/02/84
078	1B	15, 3/29/84
103	1B	18, 4/02/84
292	1B	18, 4/02/84
293	1B	18, 4/02/84
306	1B	18, 4/02/84
308	1B	18, 4/02/84
344	1B	19, 4/05/84

TOTAL.....14

NOTE	DESCRIPTION
1	Duplicate of PS 054
2	Incorporated in Amendment 12 to the GGNS Operating License (MAEC-84/0068)
3	Action required by I&E Bulletin 79-08 is complete (AECM-80/0026)
4	Tech Spec changes requested in MAEC-80/260 complete or covered under an open Problem Sheet (PS 199)
5	Duplicate of PS 144

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
PRIORITY 1C		
021	1C	15, 3/29/84
034	1C	18, 4/02/84
037	1C	15, 3/29/84
038	1C	15, 3/29/84
139	1C	15, 3/29/84
198	1C	16, 3/31/84
213	1C	16, 3/31/84
262	1C	16, 3/31/84
285	1C	18, 4/02/84
329	1C	18, 4/02/84

TOTAL.....10

PRIORITY 2A

022	2A	17, 4/01/84
112	2A	15, 3/29/84
180	2A	17, 4/01/84
309	2A	18, 4/02/84
310	2A	18, 4/02/84

TOTAL.....5

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
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***PRIORITY 2B**

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009	2B	25, 4/16/84
010	2B	15, 3/29/84
011	2B	15, 3/29/84
014	2B	21, 4/08/84
019	2B	15, 3/29/84
020	2B	17, 4/01/84
023	2B	15, 3/29/84
024	2B	18, 4/02/84
028	2B	15, 3/29/84
032	2B	21, 4/08/84
041	2B	21, 4/08/84
042	2B	15, 3/29/84
045	2B	17, 4/01/84
047	2B	15, 3/29/84
049	2B	18, 4/02/84
050	2B	17, 4/01/84
057	2B	17, 4/01/84
060	2B	15, 3/29/84
073	2B	18, 4/02/84
075	2B	17, 4/01/84
077	2B	21, 4/08/84
083	2B	22, 4/09/84
100	2B	25, 4/16/84
102	2B	15, 3/29/84
110	2B	17, 4/01/84
114	2B	18, 4/02/84
116	2B	15, 3/29/84
119	2B	15, 3/29/84
120	2B	25, 4/16/84
129	2B	15, 3/29/84
132	2B	15, 3/29/84
137	2B	15, 3/29/84
144	2B	15, 3/29/84
164	2B	18, 4/02/84
167	2B	17, 4/01/84
168	2B	21, 4/08/84
172	2B	17, 4/01/84
176	2B	17, 4/01/84
185	2B	18, 4/02/84
196	2B	16, 3/31/84
201	2B	22, 4/09/84
211	2B	18, 4/02/84

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
223	2B	18, 4/02/84
229	2B	21, 4/08/84
235	2B	18, 4/02/84
236	2B	17, 4/01/84
244	2B	18, 4/02/84
245	2B	17, 4/01/84
246	2B	18, 4/02/84
247	2B	18, 4/02/84
250	2B	18, 4/02/84
257	2B	17, 4/01/84
259	2B	18, 4/02/84
264	2B	17, 4/01/84
266	2B	17, 4/01/84
267	2B	18, 4/02/84
271	2B	18, 4/02/84
273	2B	18, 4/02/84
275	2B	18, 4/02/84
277	2B	18, 4/02/84
284	2B	18, 4/02/84
294	2B	18, 4/02/84
297	2B	18, 4/02/84
299	2B	18, 4/02/84
303	2B	18, 4/02/84
307	2B	18, 4/02/84
312	2B	22, 4/09/84
313	2B	18, 4/02/84
314	2B	18, 4/02/84
315	2B	18, 4/02/84
316	2B	18, 4/02/84
321	2B	18, 4/02/84
323	2B	18, 4/02/84
330	2B	18, 4/02/84
331	2B	18, 4/02/84
333	2B	18, 4/02/84
335	2B	18, 4/02/84
338	2B	18, 4/02/84
342	2B	19, 4/05/84
345	2B	21, 4/08/84
346	2B	23, 4/10/84
347	2B	21, 4/08/84
350	2B	21, 4/08/84
357	2B	21, 4/08/84
359	2B	21, 4/08/84
360	2B	21, 4/08/84
364	2B	21, 4/08/84

TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

Problem Sheet	Assignment	Current Revision
372	2B	25, 4/16/84

TOTAL.....88

PRIORITY 2C

035	2C	15, 3/29/84
108	2C	15, 3/29/84
124	2C	18, 4/02/84
253	2C	18, 4/02/84

TOTAL.....4

TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

Problem Sheet	Assignment	Current Revision
PRIORITY 2D		
003	2D	17, 4/01/84
006	2D	21, 4/08/84
012	2D	18, 4/02/84
017	2D	15, 3/29/84
025	2D	17, 4/01/84
026	2D	15, 3/29/84
030	2D	17, 4/01/84
031	2D	17, 4/01/84
043	2D	15, 3/29/84
051	2D	15, 3/29/84
055	2D	15, 3/29/84
058	2D	17, 4/01/84
059	2D	17, 4/01/84
061	2D	15, 3/29/84
066	2D	22, 4/09/84
067	2D	15, 3/29/84
071	2D	17, 4/01/84
072	2D	17, 4/01/84
074	2D	17, 4/01/84
085	2D	20, 4/06/84
086	2D	18, 4/02/84
087	2D	17, 4/01/84
088	2D	17, 4/01/84
089	2D	15, 3/29/84
090	2D	17, 4/01/84
091	2D	15, 3/29/84
092	2D	18, 4/02/84
094	2D	21, 4/08/84
109	2D	15, 3/29/84
111	2D	18, 4/02/84
115	2D	17, 4/01/84
118	2D	16, 3/31/84
122	2D	17, 4/01/84
123	2D	18, 4/02/84
126	2D	15, 3/29/84
128	2D	17, 4/01/84
133	2D	18, 4/02/84
134	2D	17, 4/01/84
136	2D	15, 3/29/84
138	2D	15, 3/29/84
140	2D	18, 4/02/84
154	2D	16, 3/31/84

TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

Problem Sheet	Assignment	Current Revision
155	2D	18, 4/02/84
156	2D	17, 4/01/84
157	2D	17, 4/01/84
158	2D	17, 4/01/84
159	2D	16, 3/31/84
162	2D	16, 3/31/84
163	2D	16, 3/31/84
165	2D	17, 4/01/84
169	2D	18, 4/02/84
171	2D	16, 3/31/84
173	2D	21, 4/08/84
177	2D	17, 4/01/84
178	2D	17, 4/01/84
179	2D	16, 3/31/84
182	2D	17, 4/01/84
183	2D	18, 4/02/84
184	2D	16, 3/31/84
190	2D	20, 4/06/84
191	2D	18, 4/02/84
192	2D	16, 3/31/84
193	2D	16, 3/31/84
194	2D	18, 4/02/84
203	2D	22, 4/09/84
212	2D	18, 4/02/84
221	2D	16, 3/31/84
225	2D	20, 4/06/84
237	2D	18, 4/02/84
238	2D	18, 4/02/84
239	2D	18, 4/02/84
240	2D	17, 4/01/84
241	2D	17, 4/01/84
248	2D	18, 4/02/84
249	2D	22, 4/09/84
263	2D	17, 4/01/84
265	2D	18, 4/02/84
269	2D	18, 4/02/84
272	2D	22, 4/09/84
274	2D	18, 4/02/84
276	2D	18, 4/02/84
278	2D	18, 4/02/84
279	2D	17, 4/01/84
280	2D	18, 4/02/84
286	2D	18, 4/02/84
287	2D	18, 4/02/84
288	2D	18, 4/02/84

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
302	2D	18, 4/02/84
304	2D	21, 4/08/84
334	2D	18, 4/02/84
336	2D	18, 4/02/84
337	2D	18, 4/02/84
343	2D	19, 4/05/84
349	2D	21, 4/08/84
351	2D	21, 4/08/84
352	2D	21, 4/08/84
353	2D	21, 4/08/84
354	2D	21, 4/08/84
355	2D	21, 4/08/84
356	2D	21, 4/08/84
358	2D	21, 4/08/84
361	2D	21, 4/08/84
362	2D	21, 4/08/84
363	2D	21, 4/08/84
365	2D	24, 4/13/84
366	2D	24, 4/13/84
371	2D	24, 4/13/84

TOTAL.....107

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
PRIORITY 2E		
002	2E	15, 3/29/84
004	2E	22, 4/09/84
027	2E	15, 3/29/84
036	2E	20, 4/06/84
052	2E	15, 3/29/84
053	2E	17, 4/01/84
062	2E	18, 4/02/84
063	2E	17, 4/01/84
064	2E	15, 3/29/84
065	2E	15, 3/29/84
069	2E	17, 4/01/84
079	2E	15, 3/29/84
093	2E	22, 4/09/84
095	2E	22, 4/09/84
096	2E	15, 3/29/84
097	2E	15, 3/29/84
101	2E	15, 3/29/84
104	2E	17, 4/01/84
105	2E	15, 3/29/84
106	2E	18, 4/02/84
107	2E	18, 4/02/84
146	2E	15, 3/29/84
152	2E	16, 3/31/84
160	2E	21, 4/08/84
161	2E	18, 4/02/84
170	2E	16, 3/31/84
174	2E	17, 4/01/84
233	2E	25, 4/16/84
255	2E	18, 4/02/84
256	2E	18, 4/02/84
270	2E	22, 4/09/84
281	2E	18, 4/02/84
282	2E	17, 4/01/84
283	2E	17, 4/01/84
289	2E	18, 4/02/84
290	2E	18, 4/02/84
295	2E	18, 4/02/84
296	2E	18, 4/02/84
298	2E	18, 4/02/84
301	2E	18, 4/02/84
311	2E	18, 4/02/84
317	2E	18, 4/02/84

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
319	2E	21, 4/08/84
320	2E	18, 4/02/84
322	2E	18, 4/02/84
324	2E	18, 4/02/84
348	2E	21, 4/08/84

TOTAL.....47

PRIORITY 2F

007	2F	15, 3/29/84
040	2F	17, 4/01/84
046	2F	15, 3/29/84
141	2F	17, 4/01/84
142	2F	15, 3/29/84
145	2F	17, 4/01/84
181	2F	17, 4/01/84
251	2F	18, 4/02/84
268	2F	18, 4/02/84

TOTAL.....9

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
PRIORITY 2G		
039	2G	17, 4/01/84
098	2G	15, 3/29/84
099	2G	21, 4/08/84
127	2G	17, 4/01/84
131	2G	15, 3/29/84
143	2G	15, 3/29/84
150	2G	17, 4/01/84
187	2G	18, 4/02/84
200	2G	18, 4/02/84
206	2G	16, 3/31/84
210	2G	18, 4/02/84

TOTAL.....11

PRIORITY 2H

008	2H	17, 4/01/84
048	2H	15, 3/29/84
153	2H	17, 4/01/84
189	2H	18, 4/02/84
204	2H	18, 4/02/84
205	2H	16, 3/31/84
207	2H	18, 4/02/84
208	2H	18, 4/02/84
209	2H	15, 3/29/84

TOTAL.....9

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision

PRIORITY 2I		
219	2I	16, 3/31/84
305	2I	18, 4/02/84
325	2I	18, 4/02/84
326	2I	18, 4/02/84
339	2I	18, 4/02/84
340	2I	18, 4/02/84

TOTAL.....6

PRIORITY 3A

013	3A	21, 4/08/84
081	3A	15, 3/29/84
082	3A	15, 3/29/84
084	3A	15, 3/29/84
148	3A	17, 4/01/84
195	3A	18, 4/02/84
197	3A	21, 4/08/84
218	3A	21, 4/08/84
220	3A	18, 4/02/84
226	3A	18, 4/02/84
234	3A	18, 4/02/84
261	3A	18, 4/02/84
300	3A	18, 4/02/84
370	3A	24, 4/13/84

TOTAL.....14

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
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PRIORITY 3B

018	3B	15, 3/29/84
029	3B	17, 4/01/84
044	3B	17, 4/01/84
056	3B	21, 4/08/84
068	3B	15, 3/29/84
070	3B	18, 4/02/84
147	3B	16, 3/31/84
149	3B	18, 4/02/84
151	3B	17, 4/01/84
166	3B	17, 4/01/84
175	3B	21, 4/08/84
199	3B	18, 4/02/84
202	3B	18, 4/02/84
214	3B	21, 4/08/84
215	3B	16, 3/31/84
216	3B	18, 4/02/84
217	3B	21, 4/08/84
222	3B	16, 3/31/84
224	3B	16, 3/31/84
227	3B	21, 4/08/84
228	3B	17, 4/01/84
231	3B	17, 4/01/84
232	3B	17, 4/01/84
242	3B	18, 4/02/84
243	3B	18, 4/02/84
252	3B	18, 4/02/84
254	3B	18, 4/02/84
258	3B	18, 4/02/84
260	3B	18, 4/02/84
291	3B	18, 4/02/84
318	3B	18, 4/02/84
327	3B	18, 4/02/84
328	3B	18, 4/02/84
332	3B	21, 4/08/84
341	3B	18, 4/02/84
367	3B	24, 4/13/84
368	3B	24, 4/13/84
369	3B	24, 4/13/84
800	3B	18, 4/02/84
801	3B	18, 4/02/84
802	3B	18, 4/02/84
803	3B	18, 4/02/84

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TECHNICAL SPECIFICATION REVIEW
PROBLEM SHEET LISTING
Total Problem Sheets Generated

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Problem Sheet	Assignment	Current Revision
804	3B	18, 4/02/84
805	3B	24, 3/13/84
806	3B	18, 4/02/84
807	3B	18, 4/02/84
808	3B	18, 4/02/84
809	3B	18, 4/02/84
810	3B	18, 4/02/84
811	3B	18, 4/02/84
812	3B	23, 4/10/84
813	3B	22, 4/09/84
814	3B	22, 4/09/84
815	3B	22, 4/09/84
816	3B	23, 4/10/84
817	3B	23, 4/10/84
818	3B	23, 4/10/84
819	3B	23, 4/10/84
820	3B	23, 4/10/84
821	3B	24, 4/13/84
822	3B	24, 4/13/84
823	3B	24, 4/13/84
824	3B	24, 4/13/84
825	3B	24, 4/13/84
826	3B	25, 4/16/84
827	3B	25, 4/16/84
828	3B	25, 4/16/84
829	3B	25, 4/16/84
830	3B	25, 4/16/84
831	3B	25, 4/16/84
832	3B	25, 4/16/84

TOTAL.....71

TABLE 5-7

TABLE 5

FSAR INCONSISTENCY CATEGORIES

<u>CATEGORY - TITLE</u>	<u>DESCRIPTION</u>
1 - Setpoint/Parameter Inconsistency	Inconsistency involves an inaccurate FSAR listing of setpoints or system parameter value or of frequency/duration of system testing.
2 - Editorial/Internal FSAR Inconsistency	Inconsistency involves clearly an editorial error, incomplete information, or information which is accurately described in one FSAR section but inaccurately described elsewhere in the FSAR.
3 - FSAR/As-built Inconsistency	Inconsistency involves an inaccurate or unclear FSAR description of the physical plant hardware.
4 - Organizational	Inconsistency involves an inaccurate or unclear FSAR discussion in an organizational and administrative area.
5 - Miscellaneous	Inconsistency involves an FSAR inaccuracy which is not applicable to other categories.
6 - Technical Specification Inaccuracy	Inconsistency involves condition in which FSAR is accurate and Technical Specification requires revision to resolve inconsistency.

TABLE 6

FSAR Inconsistencies - Overall TSRP Totals

Total, Technical Specification sections reviewed	270
Technical Specification sections identified to have one or more FSAR inconsistency	55
Total Technical Specification Problem Sheets associated with FSAR inconsistencies	78
TSPS associated with FSAR inconsistencies in which the FSAR was correct and Technical Specification required revision	22
TSPS associated with FSAR inconsistencies in which the FSAR required revision	56

TABLE 7

Categorization of TSPS Related to Valid FSAR Inconsistencies

	<u>Category</u>	<u>No. of TSPS</u>	<u>%</u>
1.	Setpoint/Parameter Inconsistency	17	30
2.	Editorial Internal FSAR Inconsistency	14	25
3.	FSAR/As-built Inconsistency	8	14
4.	Organizational	12	22
5.	Miscellaneous	<u>5</u>	<u>9</u>
	TOTAL	56	100%

* This table does not include those 20 TSPS related to FSAR inconsistencies in which the FSAR was determined to be accurate while the Technical Specification required revision. The purpose of the table is to categorize the instances in which the FSAR was inaccurate.

FIGURES 1 - 13

FIGURE 1

GRAND TOTAL
TECHNICAL SPECIFICATION PROBLEM SHEET BREAKDOWN

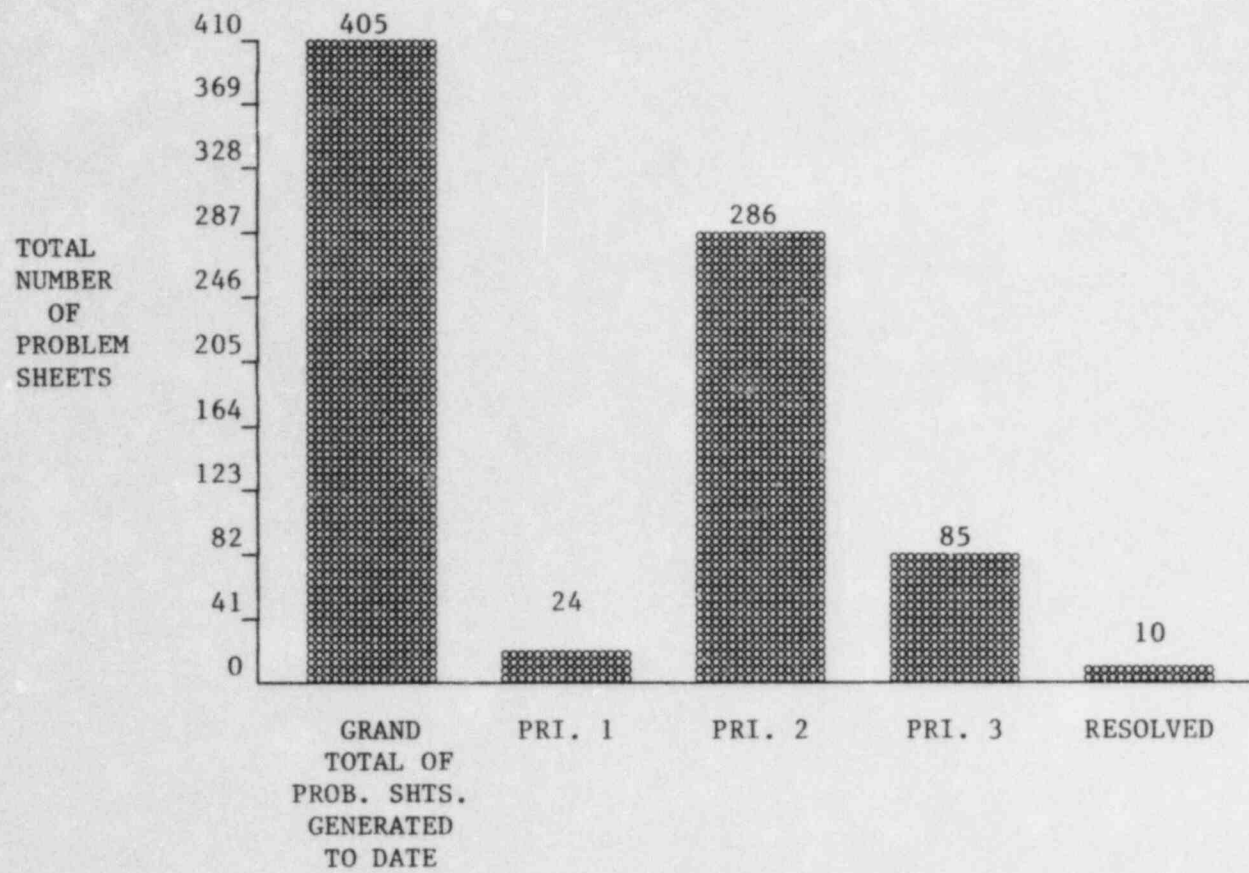


FIGURE 2

TECHNICAL SPECIFICATION PROBLEM SHEET BREAKDOWN
PROBLEM SHEETS GENERATED FROM TECH. SPEC. REVIEW EFFORT

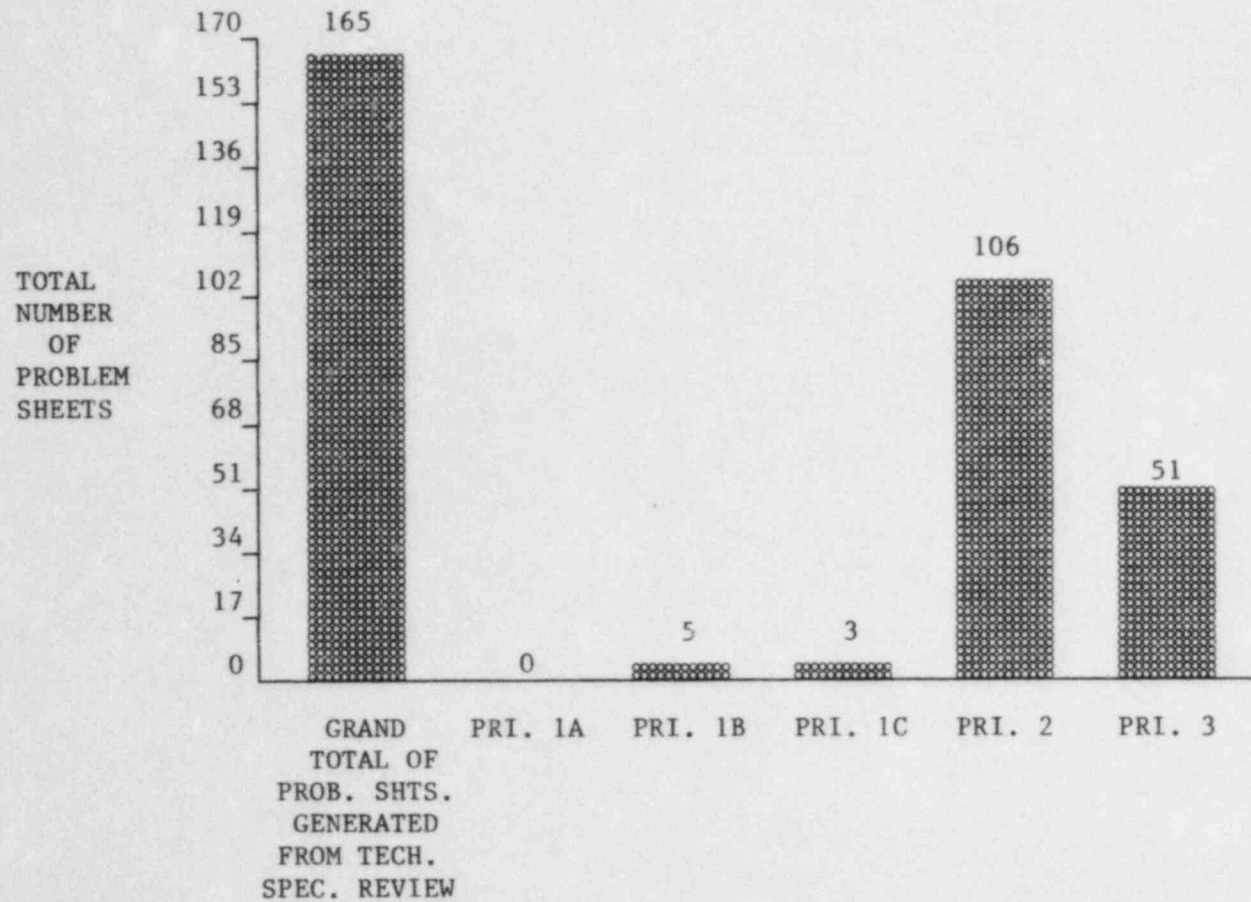


FIGURE 3

GRAND TOTAL OF PRIORITY ONE PROBLEM SHEETS
GENERATED TO DATE

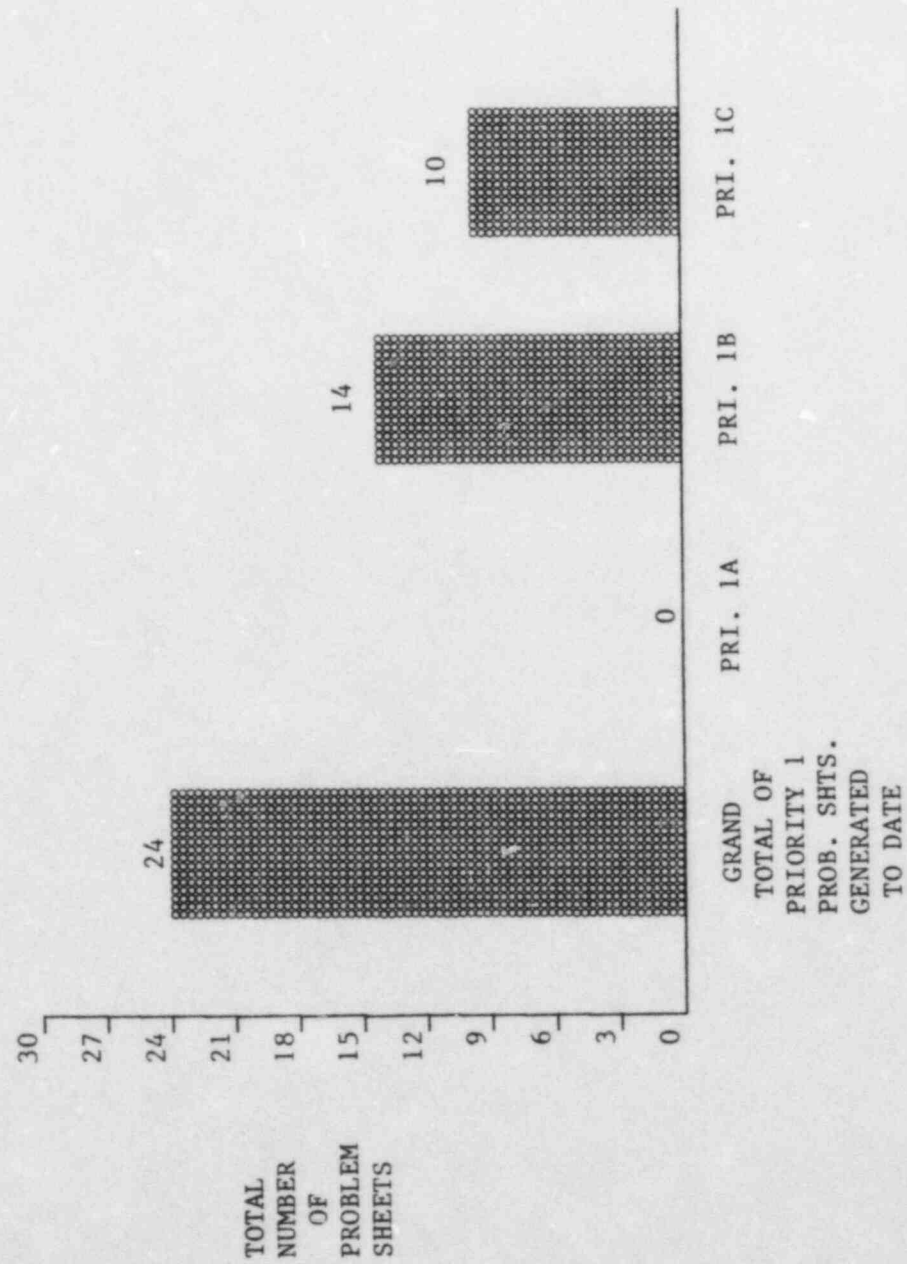


FIGURE 4

BREAKDOWN OF PRIORITY ONE PROBLEM SHEETS
FROM TECH SPEC REVIEW EFFORT

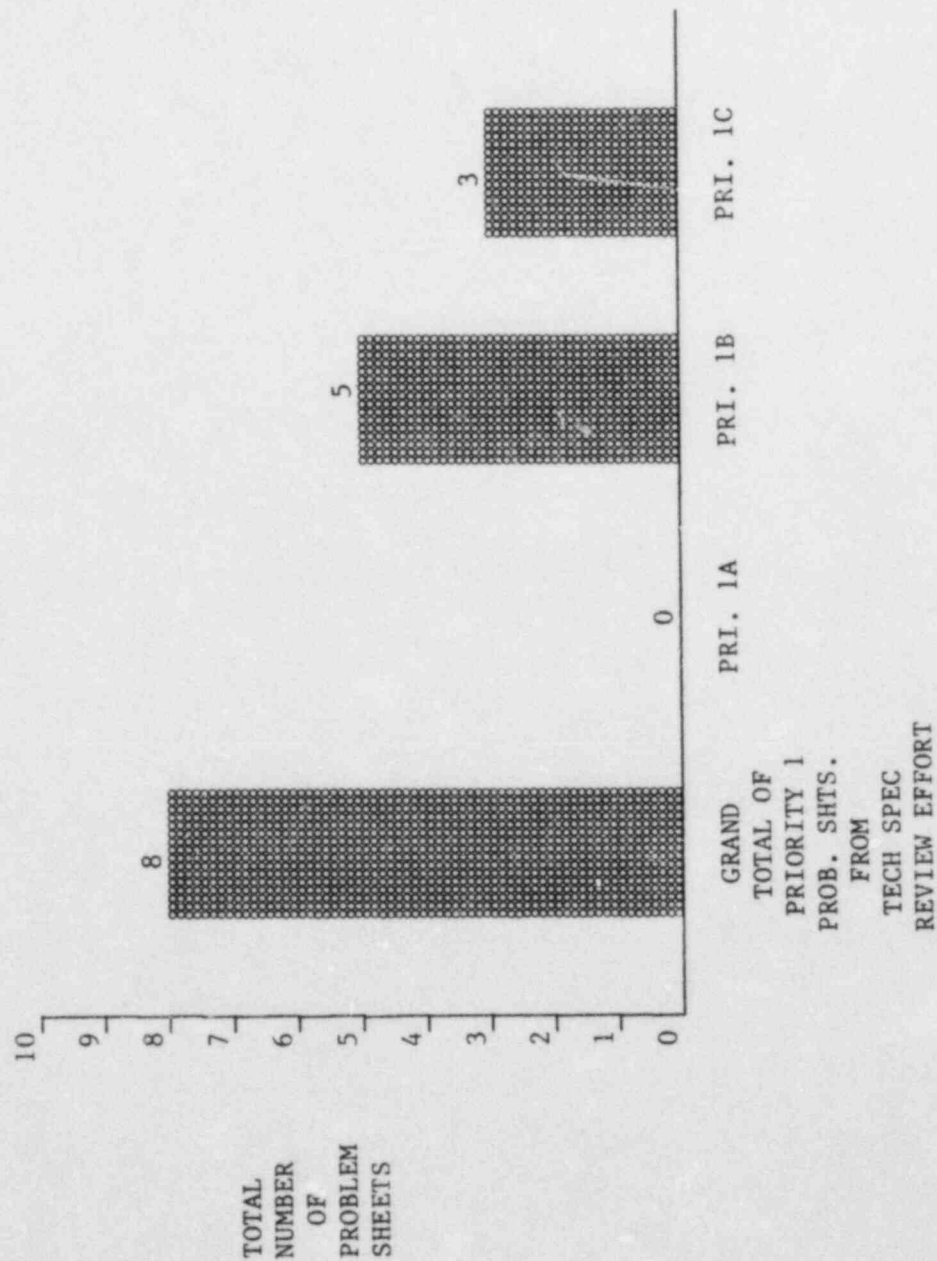


FIGURE 5

GRAND TOTAL OF PRIORITY TWO PROBLEM SHEETS
GENERATED TO DATE

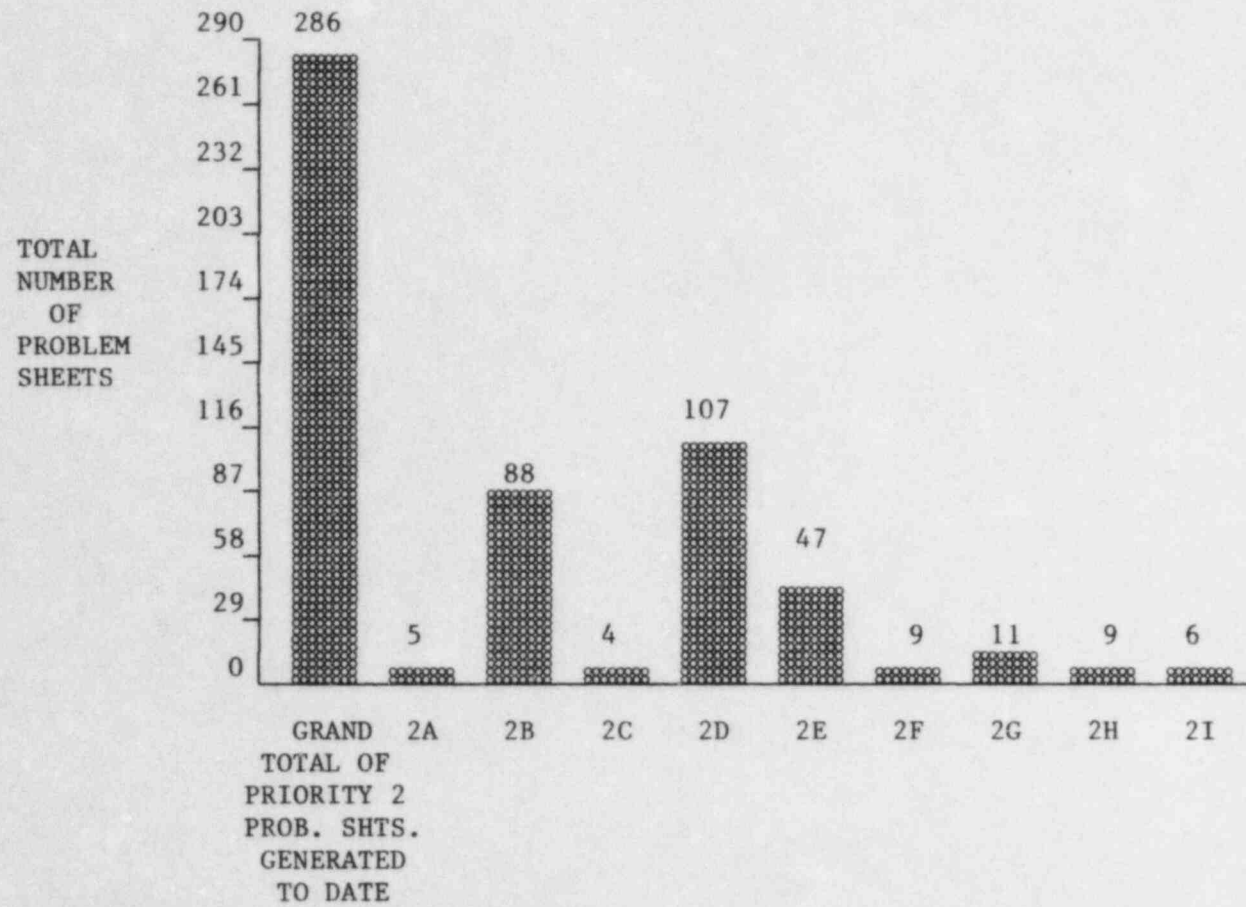


FIGURE 6

BREAKDOWN OF PRIORITY TWO PROBLEM SHEETS
FROM TECH SPEC REVIEW EFFORT

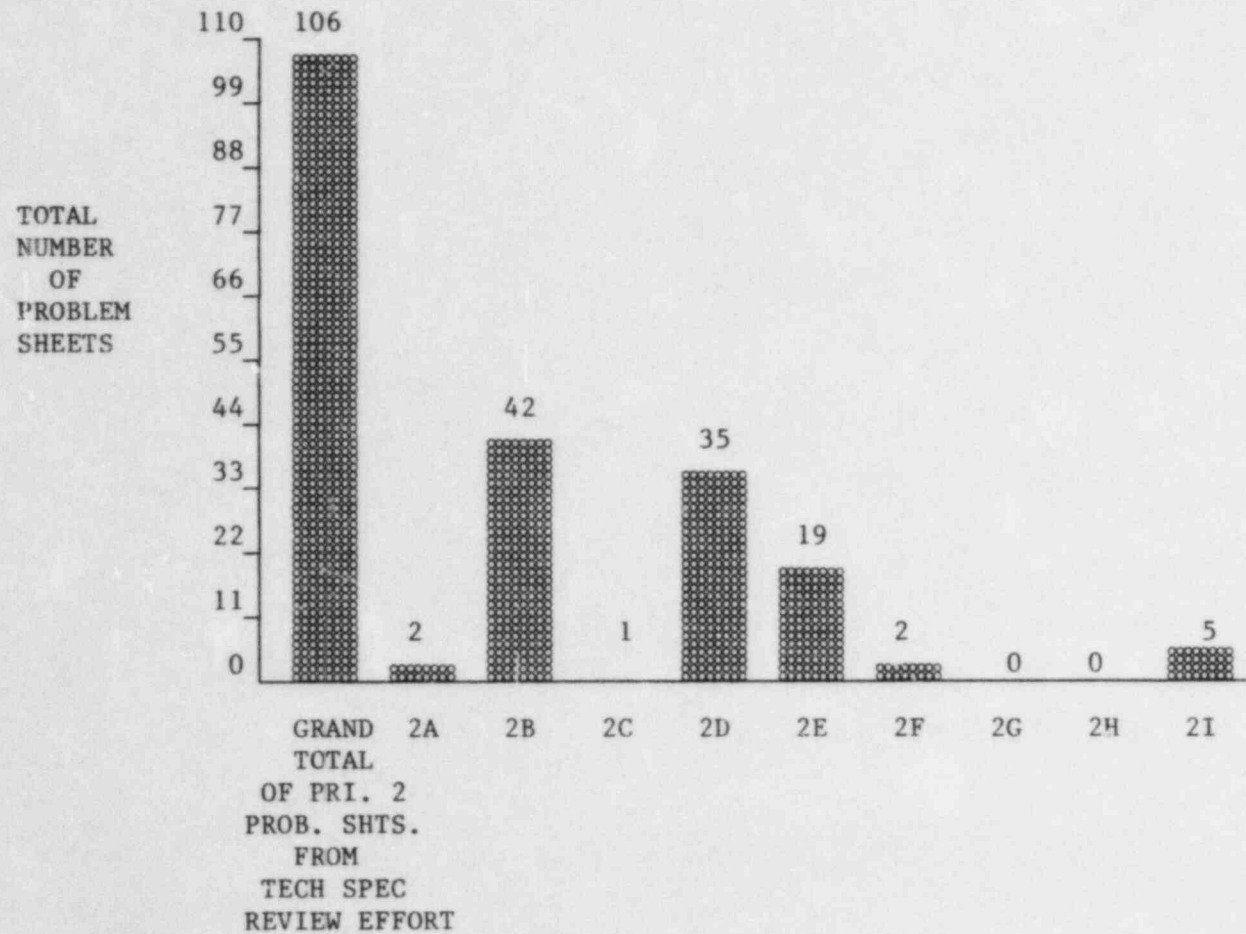


FIGURE 7

GRAND TOTAL OF PRIORITY THREE PROBLEM SHEETS
GENERATED TO DATE

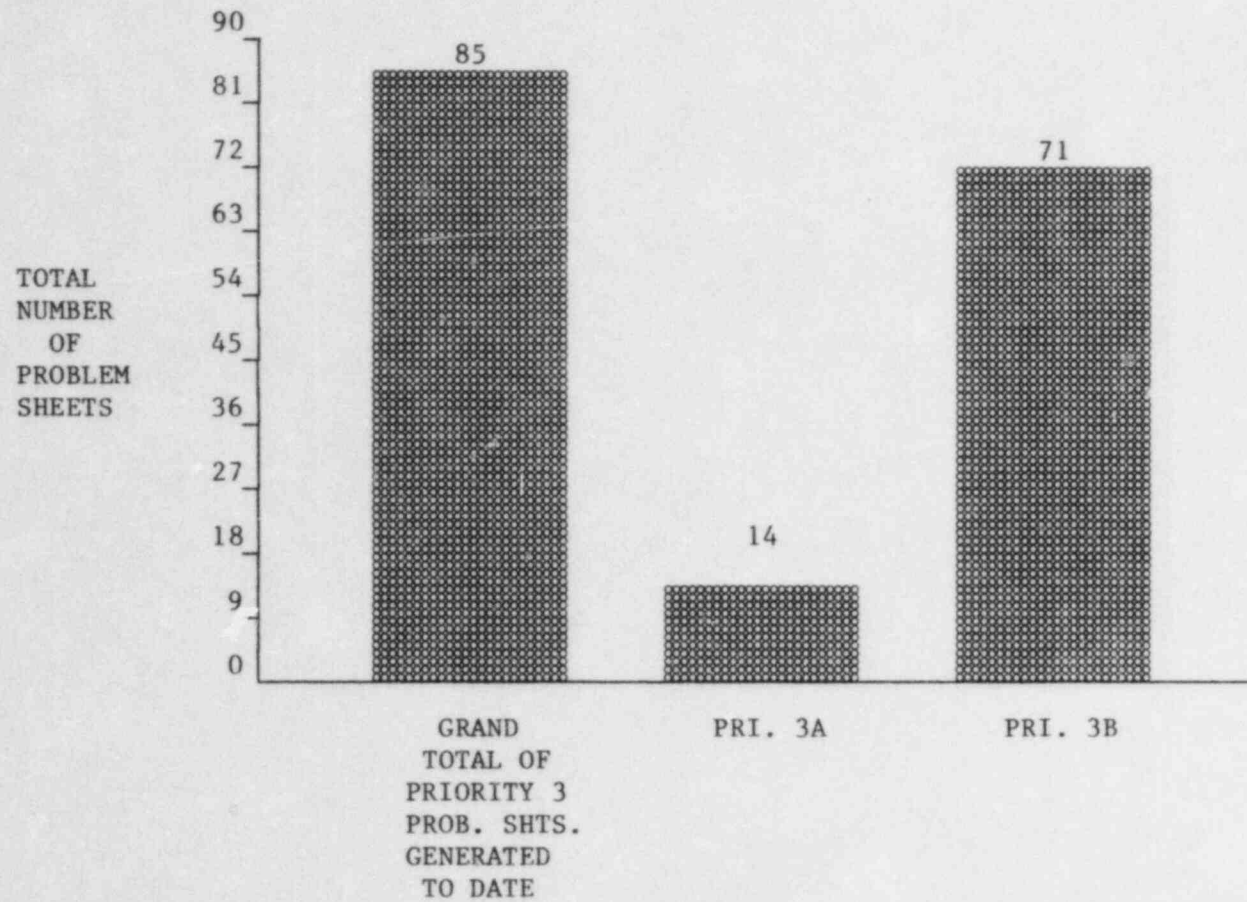


FIGURE 8

BREAKDOWN OF PRIORITY THREE PROBLEM SHEETS
FROM TECH SPEC REVIEW EFFORT

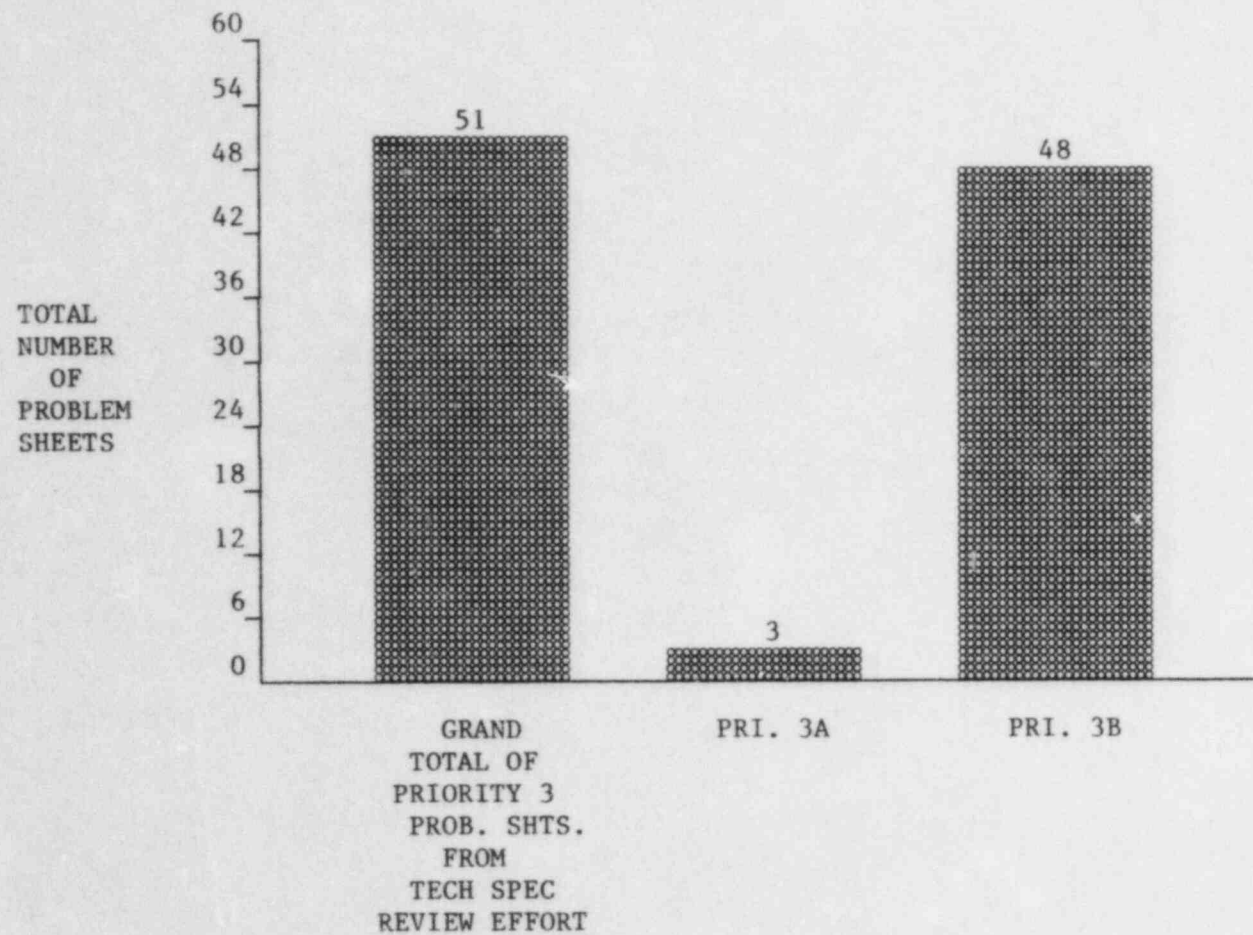


FIGURE 9

GRAND TOTAL OF INCONSISTENCY
DISTRIBUTION

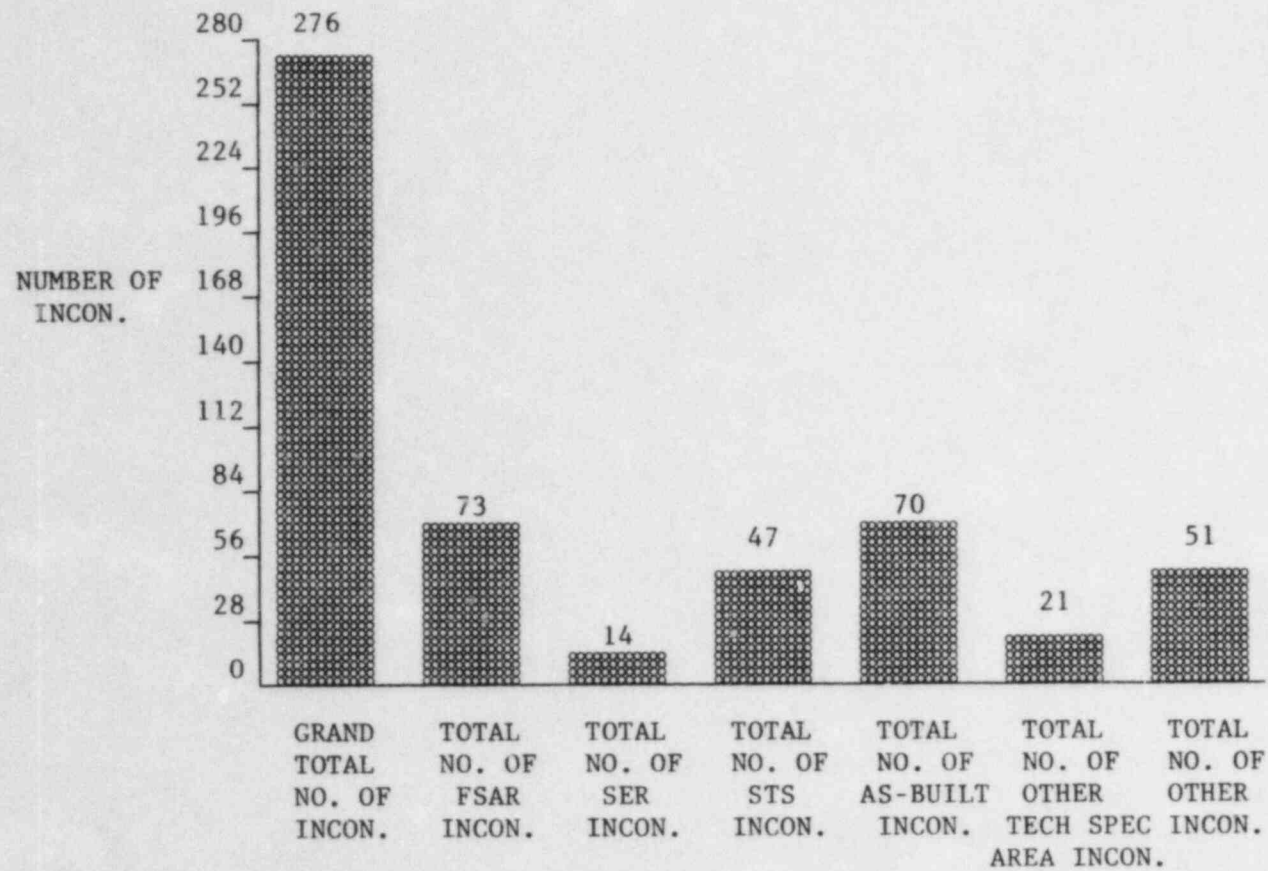


FIGURE 10

INCONSISTENCY DISTRIBUTION
TECH SPEC SECTION 2.0

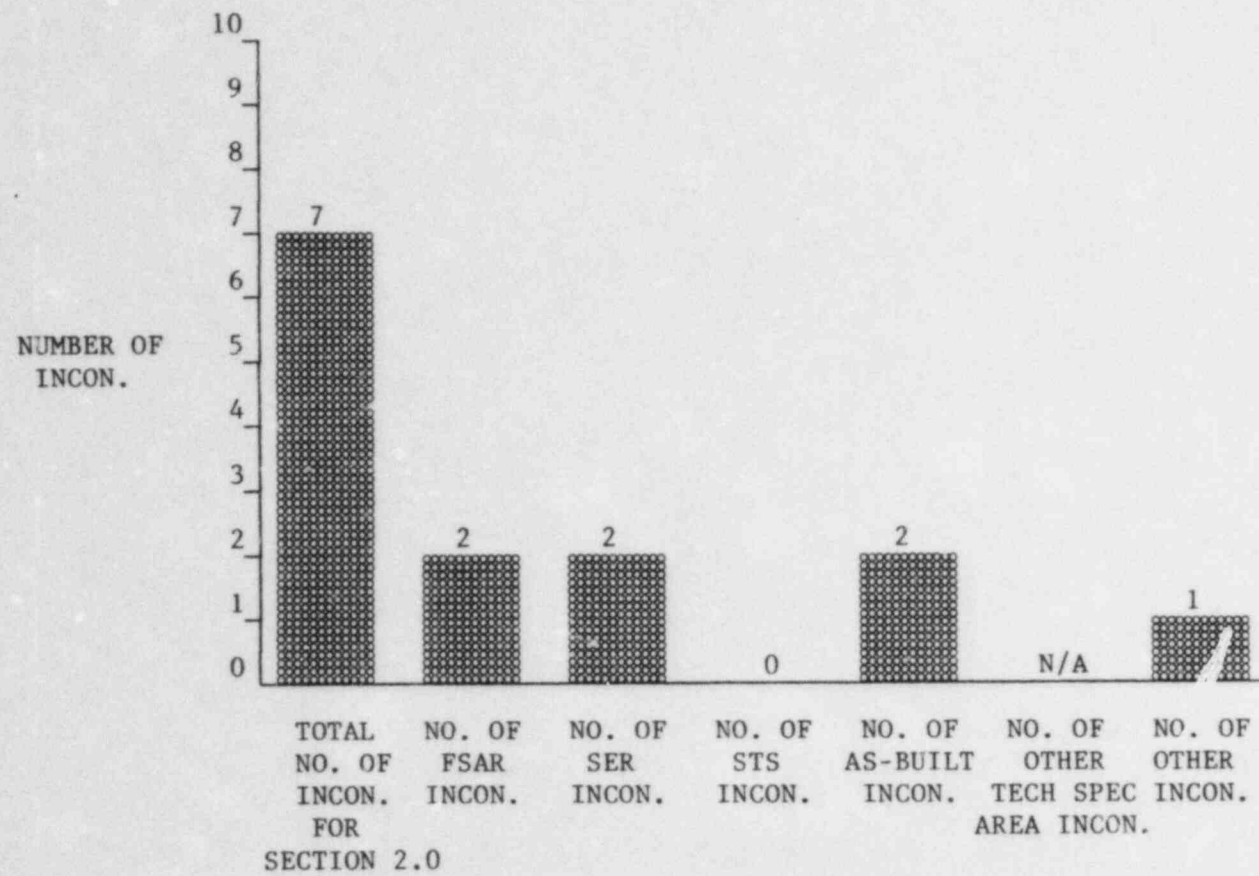


FIGURE 11

INCONSISTENCY DISTRIBUTION
TECH SPEC SECTION 3/4

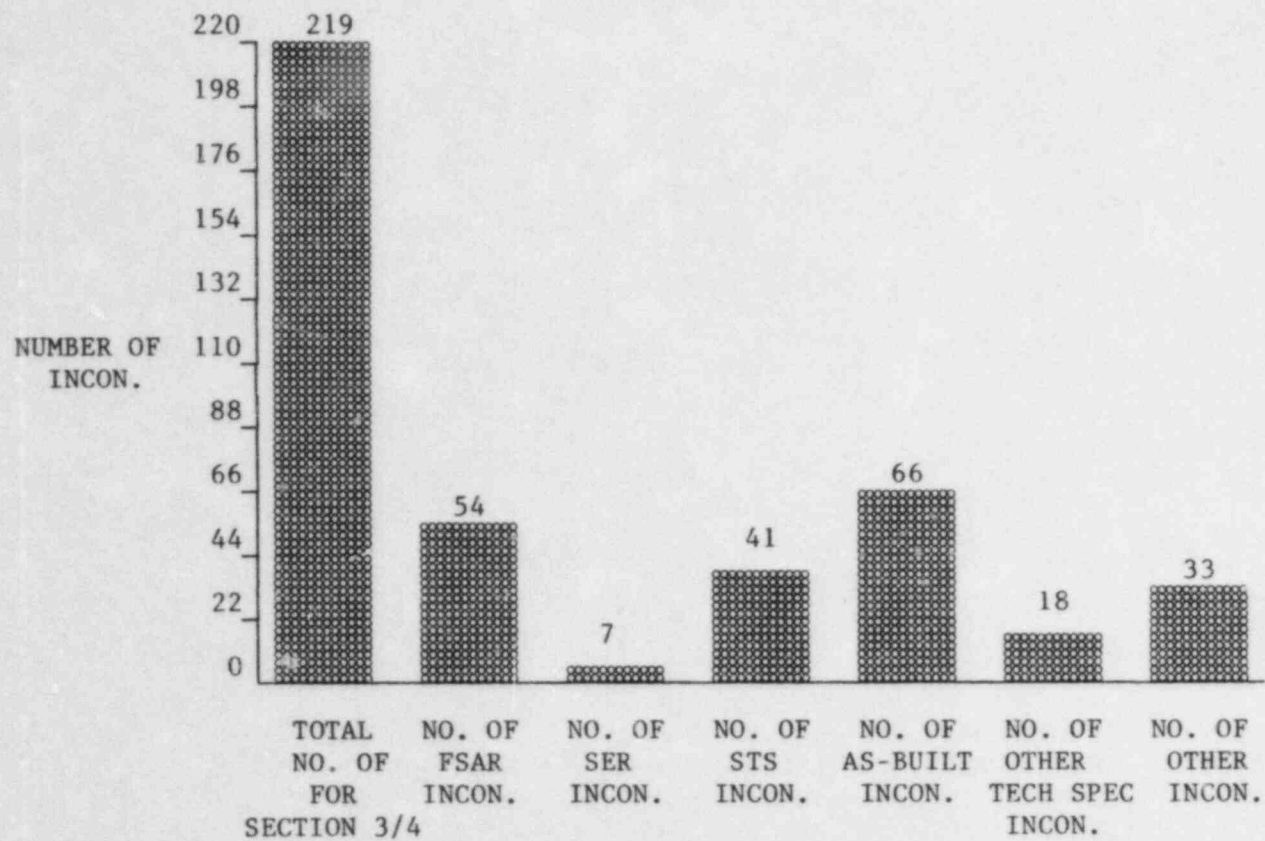


FIGURE 12

INCONSISTENCY DISTRIBUTION
TECH SPEC SECTION 5.0

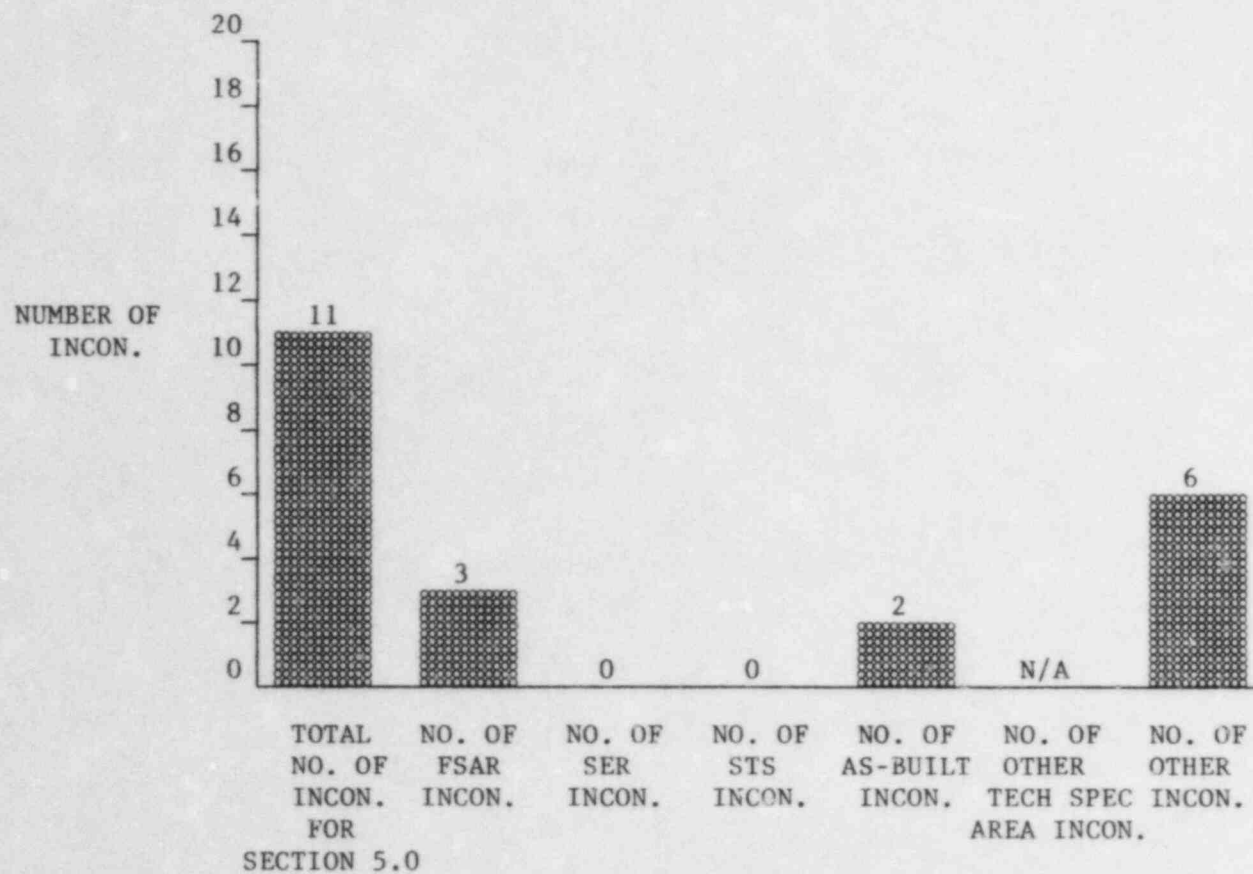
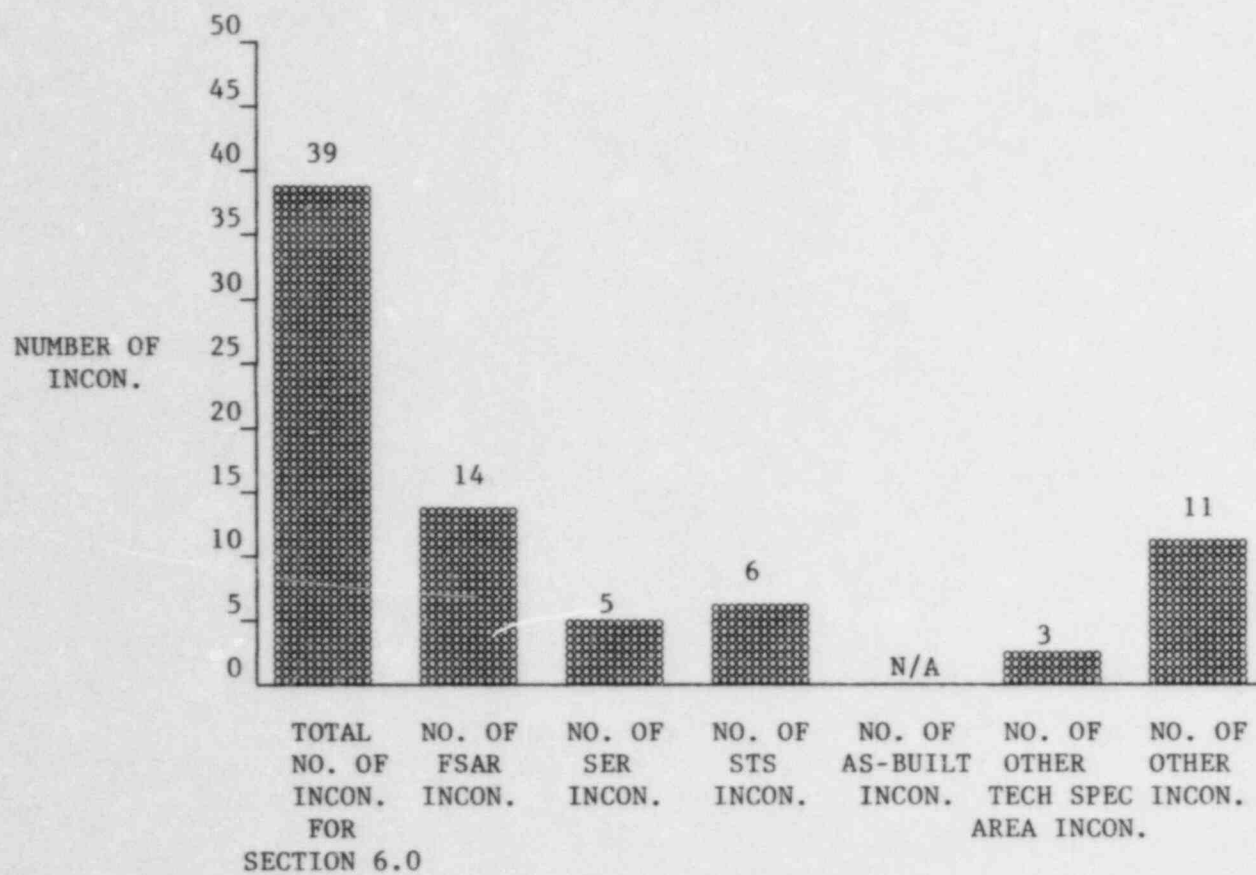


FIGURE 13

INCONSISTENCY DISTRIBUTION
TECH SPEC SECTION 6.0



ATTACHMENTS A, B, C

ATTACHMENT A

TECH SPEC PROBLEM SHEET (TSPS) PRIORITY DEFINITIONS

Priority 1

Problems Needing Resolution - Short Term

- A. Safety Significant Item which would require plant shutdown, prohibit plant startup, or require other plant actions to reestablish safe operating conditions.
- B. Existing Tech Spec is non-conservative with respect to FSAR or supporting documents (e.g. approved design specs, SER, etc.). MP&L requires NRC concurrence and/or resolution prior to next criticality.
- C. Existing Tech Spec is non-conservative with respect to FSAR or supporting documents (e.g. approved design specs, SER, etc.). MP&L requires NRC concurrence and/or resolution prior to exceeding 5% Thermal Power.

ATTACHMENT B

TECH SPEC PROBLEM SHEET (TSPS) PRIORITY DEFINITIONS (CONT'D)

Priority 2

Problems/Enhancements Needing Resolution - Mid to Long Term

- A. Existing condition could result in unnecessary challenges to safety systems or plant transients or is required to enhance plant safety.
- B. Errors or confusing items in Technical Specifications which will not result in non-conservative operation with a reasonable dependence on administrative controls/plant knowledge/operational practices; Licensing commitments which require a Tech Spec change; items determined by MP&L to be important.
- C. Could restrict power level, unnecessarily require controlled plant shutdown, unnecessarily restrict mode changes (e.g. 3.0.4 exemptions justified), or restrict refueling operations.
- D. Typographical Errors and Enhancements/Concerns which do not fall into a higher priority
- E. Problems with, or enhancements to Tech Spec sections other than 3/4 (e.g. Administrative Controls, Bases, etc.)
- F. Over-conservative Tech Specs for which changes are cost-justified
- G. Pending Design Changes (Enhancements) which require Tech Spec changes
- H. Pending design/analysis (e.g. Maximum Extended Operating Domain, Exxon Fuel, Single Recirc Loop Operation, etc.)
- I. Others

ATTACHMENT C

TECH SPEC PROBLEM SHEET (TSPS) PRIORITY DEFINITIONS (CONT'D)

Priority 3

Tech Spec change not justified but documented response is required

- A. Engineering/Operational justification exists for not changing the Tech Spec. Does not involve deviation from STS.
- B. Other items for which the Tech Specs do not require change. May require changes to other documents (e.g. FSAR)

ATTACHMENT D

ATTACHMENT D
PRIORITY 1B TSPS

Page 1 of 4

<u>TSPS</u>	<u>AFFECTED TECH. SPEC.</u>	<u>PROBLEM SUMMARY & SIGNIFICANCE</u>	<u>ACTION TAKEN</u>
001	3/4.5.1	GG Technical Specification required at least 7 operable ADS valves; GG Technical Specification Bases said ADS controls only 7 ADS valves - really 8. FSAR takes credit for 8 ADS valves allowing 1 ADS valve out-of-service 14 days. Analysis done to revise GG Technical Specification consistent with FSAR. Safety significant since Technical Specification as written would allow operation in an unanalyzed condition.	PCOL-84/02 Submitted
005	3/4.3.2	GG Technical Specification did not include MOC for RWCU isolation on SLC initiations. GG Technical Specification revised to include RWCU isolation on SLC initiation. Safety significant since absence of MOC would allow operation with RWCU isolation feature inoperable.	PCOL-84/02 Submitted
015	2.2.1 3/4.3.2	Drywell pressure trip units/transmitters are absolute pressure instruments but read-out in psig. Barometric pressure variations if not properly considered could affect instruments. Drywell pressure setpoints lowered 0.5 psig to accommodate barometric pressure variation. Safety significant since under abnormal or worse case conditions instruments could be non-conservative.	PCOL-84/06 Submitted
016	3/4.3.2	GG Technical Specification had 9.0/9.2 as containment pressure setpoint/allowable values. Values were analytic values. GE revised values to 8.25/8.85. Safety significance same as 015.	PCOL-84/05 Submitted

ATTACHMENT D (Continued)
PRIORITY 1B TSPS

Page 2 of 4

<u>TSPS</u>	<u>AFFECTED TECH. SPEC.</u>	<u>PROBLEM SUMMARY & SIGNIFICANCE</u>	<u>ACTION TAKEN</u>
033	3/4.3.2	Containment timer setpoint/allowable values were changed to accomodate drift. GGNS in past had increased Surveillance frequency to ensure conservative operation. Safety significance same as 015.	PCOL-84/05 Submitted
054	3/4.3.8	GG Technical Specification Table 3.3.8-1 required 1 MOC for containment spray; 2 MOC required based on trip functions review. Safety significant since present MOC reduces redundancy below level appropriate for single failure design.	PCOL-84/03 Submitted
076	3/4.3.3	GG Technical Specification Table 3.3.3-3 gives LPCI/LPCS pump response times as 45 seconds; FSAR Tables 6.3-1, 6.3-2 give correct response times of 40 seconds. Safety significant since present GG Technical Specification values could allow operation outside bounds of accident analysis.	PCOL-83/20 Submitted
078	3/4.3.5	GG Technical Specification shows MOC for RCIC level 2 trip as 2; should be 4. GG Technical Specification Action Statement refers to 2 trip systems; should be 1. Safety significant since RCIC initiation could be defeated if GG Technical Specification were misinterpreted.	PCOL-83/23 Submitted
103	3/4.3.2	MSIV drain logic not included in consideration of MOC's in GG Technical Specification Tables. Safety significant since, in worst case, six channels could be inoperable without requiring entry to Action Statement.	PCOL-84/05 Submitted

ATTACHMENT D (Continued)

PRIORITY 1B TSPS

Page 3 of 4

<u>TSPS</u>	<u>AFFECTED TECH. SPEC.</u>	<u>PROBLEM SUMMARY & SIGNIFICANCE</u>	<u>ACTION TAKEN</u>
292	3/4.6.1.3	GG Technical Specification gave air flask pressure as greater than or equal to 60 psig. Air flask pressure should be greater than or equal to 30 psig above seal pressure based on 1 psig/day allowable leakage. Safety significant since this change is needed to ensure adequate seal pressure for 30 days without makeup air supply.	PCOL-84/06 Submitted
293	3/4.6.2.3	GG Technical Specification gave air flask pressure as greater than or equal to 60 psig. Air flask pressure should be greater than or equal to 30 psig above seal pressure based on 1 psig/day allowable leakage. Safety significant since this change is needed to ensure adequate seal pressure for 30 days without makeup air supply.	PCOL-84/06 Submitted
306	3/4.6.4	Table 3.6.4.1 did not list all Drywell valves; G33-F001, F004, F250, F251 have analytic closing times and GG Technical Specification did not correctly reflect those times. Safety significant if RWCU closing times are not within analytical limits. This may result in a release following an RWCU pipe break in excess of previously analyzed releases.	PCOL-84/07A Submitted
308	3/4.3.2	Table 3.3.2-2 has area room temperature and delta-T setpoints which differ from calculated setpoint values. Safety significant since present setpoints may be too high to cause timely system isolation.	PCOL-84/07A Submitted

ATTACHMENT D (Continued)
PRIORITY 1B TSPS

Page 4 of 4

<u>TSPS</u>	<u>AFFECTED TECH. SPEC.</u>	<u>PROBLEM SUMMARY & SIGNIFICANCE</u>	<u>ACTION TAKEN</u>
344	3/4.5.1	Total developed head (TDH) values specified for ECCS pumps might not ensure GE design injection requirements were met. Flow vs. TDH might not ensure ISI requirements are met. Not safety significant though TDH presently specified may make operability determination questionable.	PCOL-84/07B Submitted

ATTACHMENT D (Continued)
PRIORITY 1C TSPS

Page 1 of 3

<u>TSPS</u>	<u>AFFECTED TECH. SPEC.</u>	<u>PROBLEM SUMMARY & SIGNIFICANCE</u>	<u>ACTION TAKEN</u>
021	3/4.7.4	New RCIC snubber added <u>per</u> DCP-82/0542. Not safety significant since snubbers can be added to Surveillance schedule and administratively controlled.	PCOL-84/03 Submitted
034	N/A	Report on Technical Specification terminology addressing ICSB concerns. (Classified 1C for tracking purposes.) Safety significance - not applicable.	AECM-84/0093 to be Submitted
037	3/4.3.2	GG Technical Specification 4.3.1.1-1, 4.3.3.1-1 require monthly calibration of Rosemont trip units; GG Technical Specification 4.3.2 does not. GG Technical Specification 4.3.2 requires 18 month calibration of Riley temperature switches; vendor recommends 12 month calibration. Not safety significant - Rosemont units are calibrated monthly; drift data on Riley units indicates 12 month calibrations adequate.	PCOL-83/20 Submitted
038	3/4.3.7.1	GG Technical Specification sets carbon bed vault radiation monitor calibration frequency at 18 months; vendor recommends 12 months. Other rad monitors similarly affected. Not safety significant since monitors are currently calibrated annually.	PCOL-84/03 Submitted
139	3/4.7.4	Revise GG Technical Specification Table 3.7.4-2 to: add missing snubbers; delete voided, superceded, incorrect snubbers; correct typos; add non-Q snubbers included in stress analysis of Q-piping. Not safety significant since snubbers can be added to surveillance schedule and administratively controlled.	PCOL-83/21 Submitted

ATTACHMENT D (Continued)
PRIORITY IC TSPS

Page 2 of 3

<u>TSPS</u>	<u>AFFECTED TECH. SPEC.</u>	<u>PROBLEM SUMMARY & SIGNIFICANCE</u>	<u>ACTION TAKEN</u>
198	3/4.3.7.1	GG Technical Specification Table 3.3.7.1-1, Items 6, 7, 8, 9 have same initiation logic but different MOC. Safety significant since 2 channels/trip system may be required to meet single failure criteria.	PCOL-84/03 Submitted
213	3/4.3.3	GG Technical Specification Table 3.3.3-1 gives ADS MOC as 1/valve; should be 2/system. Safety significant since GG Technical Specification is not testing proper function.	PCOL-84/03 Submitted
262	3/4.3.7.12	GG Technical Specification 3.3.7.5 (accident monitoring instrumentation) calls for SBGT effluent monitoring in operational conditions 1, 2; GG Technical Specification 3.3.7.12 should include SBGT effluent monitoring instrumentation and require operability whenever SBGT operates. Not safety significant; however, SBGT release point should be monitored during all SBGT operations.	PCOL-84/05 Submitted
285	3/4.3.7.8	GG Technical Specification Bases require conformance to Regulatory Guide 1.95, Revision 1, 1977, which requires 6 month calibration frequency on chlorine detectors. Vendor requires 12 month calibration; GG Technical Specification requires 18 month calibration. Not safety significant since calibration of detectors can be administratively required more frequently.	PCOL-84/04 Submitted

ATTACHMENT D (Continued)
PRIORITY 1C TSPS

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<u>TSPS</u>	<u>AFFECTED TECH. SPEC.</u>	<u>PROBLEM SUMMARY & SIGNIFICANCE</u>	<u>ACTION TAKEN</u>
329	3/4.3.7.5	GG Technical Specification requires post-accident radiation monitors operable in operating conditions 1 and 2. Standard Technical Specifications requires conditions 1, 2, 3. FSAR 15 implies operability in conditions besides 1 and 2. Safety significant since rad monitors may not be operable in all modes for which they are required.	PCOL-84/07A Submitted

ATTACHMENT E

ATTACHMENT E
FOOTNOTES - FOR DELETED MATRIX ITEMS

Page 1 of 17

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
300	210	2G	None.	Delete. Not an inconsistency - this remark is in reference to a future modification to add additional scram discharge volume float switches.
301	124	2C	None.	Delete. This is not an inconsistency but MP&L's desire to increase the allowed time for performing shutdown margin demonstration. The GGNS Tech Spec is not inconsistent with the STS. The GGNS Tech Specs are more conservative.
302	N/A	N/A	None.	Delete. This adds the word "withdrawn" to GGNS Tech Spec. STS already has. Provides a greater degree of flexibility.
303	N/A	N/A	None.	Delete. STS states "3.0.4 Not Applicable;" GGNS Tech Spec does not. GGNS Tech Spec is more conservative than STS.
304	N/A	N/A	None.	Delete. This is an inconsistency with STS but should remain in the GGNS Tech Spec. GGNS Tech Spec has a provision for 4.0.4 exemption after maintenance on CRDs. If provisions for "3.0.4 Not applicable" are added to GGNS Tech Spec as in STS, then this note can be deleted.
305	108	2C	None.	Delete. GE is recommending that some of the action statements should actually be written into the LCO vs. the action statement. The plant can operate under this Tech Spec. This does not render the GGNS Tech Spec inconsistent with plant design, it only provides better operating margin.
306	154	2D	None.	Delete. TSPS #154 is in error - Tech Spec is OK as written.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
307	N/A	N/A	None.	Delete. STS has provision for "3.0.4 Not Applicable." Need to add to GGNS Tech Spec when possible. GGNS Tech Spec is now more conservative.
308	N/A	N/A	None.	Delete. Action is consistent with STS but does not adequately verify scram header pressure. It does demonstrate CRD pump operating but not at 1750 psig. There are other sufficient methods available to measure header pressure, if desired.
309	214	3B	None.	Delete. Design was not intended for this type surveillance requirement. GE recommends deleting this surveillance. GGNS Tech Spec and STS requires checking the check valves between the HCU and CRD pump. This does not correspond to GE requirements. GGNS Tech Specs are overly conservative.
310	N/A	N/A	None.	Deleted. STS has provisions for "3.0.4 Not Applicable." Need to add to GGNS Tech Specs when possible. GGNS Tech Spec is more conservative.
311	155	2D	None.	Delete. GGNS design has "an alternate rod position indicator." GGNS has 2 channels of RPI.
312	N/A	N/A	None.	Delete. STS has provisions for "3.0.4 Not Applicable." Need to add to STS when possible. GGNS Tech Spec is more conservative.
313	N/A	N/A	None.	Delete. STS now provides for rearming of CRD for testing. Need to add to GGNS Tech Specs when possible. GGNS Tech Spec is more conservative.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
314	051	2D	None.	Delete. This is only a misspelled word "withdrawl" vs "withdrawal."
315	N/A	N/A	None.	Delete. This was identified by the GE FSAR/SER review and is totally inconsistent with the LSE review. LSE states 3/4.1.4.2 is adequate and meets design requirements.
316	156	2D	None.	Delete. GE would like to add storage tank outlet valve to action statement. However, GGNS Tech Spec is consistent with STS.
317	157	2D	None.	Delete. This is not an inconsistency. Illegible figures are not an inconsistency; however, they will be corrected.
318	N/A	N/A	None.	Delete. We do not see this as an inconsistency but only as a GE recommendation. MP&L's interpretation and understanding of the Tech Spec is that the pumps are run one at a time for testing of SLC.
319	N/A	N/A	None.	Agree. Total peaking factor is in STS but not GGNS Tech Spec.
320	049	2B	None.	Delete. STS allow 6 hours. GGNS Tech Spec says 2 hours, thus we are more conservative.
321	049	2B	None.	Delete. Provides more operational flexibility. STS allows 6 hours vs 2 hours as in GGNS Tech Spec. We are more conservative.
322	N/A	N/A	None.	Delete. The simulated thermal power time constant is given in Table 4.3.1.1-1, footnote (1).

ATTACHMENT E
FOOTNOTES - FOR DELETED MATRIX ITEMS

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
323	040	2F	None.	Delete. GGNS Tech Specs are much more conservative, thus are not inconsistent with requirements.
324	N/A	N/A	None.	Delete. Delete all response times from Table 3.3.2 except Mainsteam Line Isolation response time per FSAR. This does not appear from GE's interpretation to an inconsistency. The GGNS Tech Specs are more conservative.
325	204	2H	None.	Delete. The ** (indicating preliminary values to be verified during S/W testing) are missing.
326	206	2G	None.	Delete. This is not an inconsistency for the plant as-built. GE listed this against the LPCI/LPCS interlocks to be installed in first refuel outage.
327	N/A	N/A	None.	Delete. Only the min flow function is inconsistent with STS as the GGNS Tech Spec covers the power monitor portion under LSSS Tech Spec requirements. Change notes to say "GGNS Tech Spec and STS differ in that min flow trip functions for LPCI/LPCS have been included in STS."
328	074	2D	None.	Delete. No specific item is identified.
329	205	2H	None.	Delete. This is not an inconsistency until first refueling outage. The HPCS wide range level instrument nondensity compensation problem will be resolved prior to restart following the first refuel outage.
330	N/A	N/A	None.	Delete. ESF notation vs. ECCS is not an inconsistency especially in the ECCS Spec.

ATTACHMENT E
FOOTNOTES - FOR DELETED MATRIX ITEMS

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
331	047	2B	None.	Delete. This is not viewed as an inconsistency, but a word clarification within the same Tech Spec. The GGNS Tech Spec is consistent with all other references. Testing frequency EOC-RPT response time testing.
332				Number not used.
333	237	2D	None.	Delete. The APRM Rod Block of 4% vs. the 5% in Tech Spec is not an inconsistency. When Grand Gulf implements ATWS during the refueling outage, this Tech Spec will be changed.
334				Number not used.
335	029	3B	None.	Delete. This is not an inconsistency. Plant Staff has identified a better way to perform neutron monitoring functional test without having to rely on Position Statement 12. This is purely an implementation issue and has no bearing on the Tech Specs.
336	197	3A	None.	Delete. Refueling Rod Blocks not included in Rod Block Inst. Spec but are included in Refueling Spec. GGNS Tech Spec is consistent with STS.
337	118	2D	None.	Delete. This TSPS item will make the maintenance of the SRM drives possible in Operational Condition 5. (SRM detector not-full-in interlock rod block.)
338	048	2H	None.	Delete. The changes to the GGNS Tech Specs as a result of the MEOD analysis will be handled on a routine basis and is not an inconsistency.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
339	018	3B	None.	Delete. This item is not an inconsistent with any known document, and only needs clarification from the NRC.
340	237	2D	None.	Delete. This item refers to APRM Low Power Rod Block and is not an inconsistency with as-built condition.
341	123	2D	None.	Delete. MP&L would like to resolve the issue of the 100°F differential temperature for starting a recirc pump below 212°F but believes the Tech Specs as written are acceptable and that this is not an "inconsistency."
342				Number not used.
343	159	2D	None.	Delete. This is not an inconsistency. TSPS #159 was written for possible enhancement only.
344	221	2D	None.	Delete. This is not an inconsistency. It is written against TSPS #221 which proposes additional operational flexibility. The Tech Spec as written is more conservative than STS and exceeds the requirements of the STS.
345	N/A	N/A	None.	Delete. This is not an inconsistency. This item describes a plant modification (Low Pressure ECCS Injection Valve Rx Low Pressure Interlock) which will not be installed until first refueling outage. The Tech Spec is acceptable as written.
346	055	2D	None.	Delete. This is not an inconsistency. TSPS #55, which was written for enhancement purposes only, proposes deletion of the phrase "for up to 31 days."

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
347	160	2E	None.	Delete. This is not an inconsistency. It is written against TSPS #160 which suggests changes to the Bases to more clearly define the curves presented in Figure 3.4.6.1-1.
348	N/A	N/A	None.	Delete. This is not an inconsistency. Amendment 9 added operational enhancement to the existing wording in the STS surveillance requirement. The Tech Spec as written exceeds STS requirements. The FSAR will be revised through the normal procedures.
349	161	2E	None.	Delete. This is not an inconsistency. It was written against TSPS #161 which was discussed during the onsite GE-LSE review and determined to be adequate as written.
350	030	2D	None.	Delete. This is not an inconsistency. The HPCS line break detection surveillance as written exceeds the requirements of BWR/6-STs.
351	030	2D	None.	Delete. This is not an inconsistency. The item is written against the GE-FSAR/SER review item for Tech Spec 3/4.5.1 actions "f" and "g". This item is a proposal to change GGNS Tech Specs to be consistent with recent changes to the GE STS.
352				Number not used.
353	056	3B	None.	Delete. This is not an inconsistency. It is written against TSPS #56 which has been determined to be unjustified since Surveillance Requirements already exists for the CST automatic transfer.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
354	162	2D	None.	Delete. This is not an inconsistency. It is written against TSPS #162 which involves a clarification of an ACTION statement.
355	N/A	N/A	None.	Delete. This is not an inconsistency. Tech Spec as written contains surveillances that are no longer required in the GE STS.
356	163	2D	None.	Delete. This is not an inconsistency. It is written against TSPS #163 which involves a clarification of an ACTION statement.
357	N/A	N/A	None.	Delete. This is not an inconsistency. The Tech Spec as written is more conservative than the BWR/6-STs. GGNS Tech Spec contains additional Surveillance Requirements.
358	195	3A	None.	Delete. This is not an inconsistency. It is written against TSPS #195 which was written to cover the concern that the existing Surveillance Requirements may not be adequate. The onsite GE-LSE review determined that present Surveillance Requirements were adequate.
359	N/A	N/A	None.	Delete. Suppression pool temperature monitors are powered from RPS busses. Proposed change is to supply power from class 1E UPS. Future design consideration DCP process will implement any changes required if a DCP is implemented.
360	N/A	N/A	None.	Delete. Section 3.6.3.1 of the GGNS Tech Specs differs from the GE-STs in that the STS now has an additional action statement which places a time and power limit on how long the suppression pool temperature may remain above 95°F.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
361				Number not used.
362	N/A	N/A	None.	Delete. STS Surveillance requires SGTS filter train and dampers to operate for each automatic and manual actuation signal. GGNS Tech Spec requires operation for at least one of the actuation signals (approved by Amendment 9).
363	N/A	N/A	None.	Delete. STS Surveillance requires automatic valve isolation for each isolation signal. GGNS Tech Spec requires automatic valve isolation for at least one isolation signal (approved by Amendment 9).
364	006	2D	None.	Delete. This is not an inconsistency. Present snubber Tech Spec is more conservative than the recommended change and is completely adequate.
365	N/A	N/A	None.	Delete. This is an inconsistency with the STS. However, the GGNS design requires only one SRV Tail Pipe pressure switch position indicator per valve.
366				Number not used.
367	N/A	N/A	None.	Delete. GGNS Tech Spec does not require checking of diesel fire pump battery individual cell voltage or cell plate physical condition as required by STS. Batteries are automotive type and do not have provisions for these tests.
368	223	2B	None.	Delete. GGNS Tech Spec does not require periodic flush of system piping as required by STS. Flushing will be performed through periodic hose tests.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
369	N/A	N/A	None.	Delete. STS requires that when fire pumps are tested for operability that they be run on recirculation flow. GGNS Tech Specs do not state pump flow condition for testing. Tech Spec meets intent.
370				Number not used.
371	142 175	2F 3B	None.	Delete. Relaxation of diesel generator testing requirements. No changes recommended until a relaxation is made to Reg. Guide 1.93.
372	145	2F	None.	Delete. Delete Tech Spec 4.8.1.1.2.d.6 (Simulated loss of diesel generator with offsite power not available) Surveillance Requirement in accordance with NRC letter 83-30. This allows consistency between GDC 17, Reg. Guide 1.8, and Standard Review Plan. Present Tech Spec is consistent with all review documents and change is an enhancement.
373	N/A	N/A	None.	Delete. Loads sequenced on the diesel generator during ECCS actuation are referred to as "shutdown loads." They should be referred to as "emergency loads" to distinguish them from loads sequenced during a loss of offsite power. Unnecessary clarification.
374	141	2F	None.	Delete. Proposed change to define testing requirements for different types of diesels. Tech Spec does not define test frequency requirements for the two different type of diesel generators installed at GGNS. Future enhancement.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
375	174 175 026 145 134 007 043	2E 3B 2D 2F 2D 2F 2D	None.	<p>Delete. This is not an inconsistency. It was written against numerous TSPS addressed as follows:</p> <ul style="list-style-type: none"> (1) TSPS #43 - Was written for clarification enhancement only. GE onsite engineering review determined the item to be invalid. (2) TSPS #7 - Tech Spec as written is more conservative than the recommended change, so is not inconsistent. (3) TSPS #134 - Was written to correct a typographical error. (4) TSPS #145 - Tech Spec as written is more conservative than recommended change, so is not inconsistent. (5) TSPS #26 - Was written to correct a typographical error. (6) TSPS #175 - Tech Spec as written is more conservative than the recommended change, so is not inconsistent. (7) TSPS #174 - Was written for clarification enhancement only.
376				Number not used.
377	060	2B	None.	Delete. This is not an inconsistency. It was written against TSPS #60 which was written for clarification enhancement only.
378	135	N/A	None.	Delete. This is not an inconsistency. It is written against TSPS #135, which was corrected by Amendment 12 to the GGNS Tech Specs. Inconsistency no longer exists.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
379	177	2D	None.	Delete. This is not an inconsistency. It is written against TSPS #177 which involves differences in the wording of ACTION Statements 3.8.2.1(c) and 3.8.2.2(c).
380	N/A	N/A	None.	Delete. This is not an inconsistency. The item involves clarification of an ACTION statement to address additional inoperable equipment.
381	143	2G	None.	Delete. Add new load profile for battery to Tech Spec and FSAR. Increasing the valves for the DC load profile will allow addition of future loads without requiring Tech Spec change enhancements.
382	N/A	N/A	None.	Delete. 3/4.8.2.1 ACTION item a of GGNS Tech Spec is Jifferent from ACTION item a in STS (chargers not included in GGNS Tech Spec) and ACTION items c in GGNS Tech Spec is not addressed in STS ACTION items. Change is for clarification intent is met.
383	N/A	N/A	None.	Delete. FSAR revision to describe addition of UPS per DCP-82/5004. DCP covers FSAR change.
384	N/A	N/A	None.	Delete. Revise FSAR Q & R 040.5.c to agree with Tech Specs to properly describe the methods of periodic circuit breaker testing.
385	N/A	N/A	None.	Delete. GGNS Tech Spec and STS have different testing requirements for circuit breakers that protect circuits that penetrate the Containment. GGNS Tech Spec is plant specific.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
386				Number not used.
387	N/A	N/A	None.	Delete. Add surveillance requirement to perform channel calibration following maintenance of a motor starter. This is function of standard maintenance practices and does not belong in Tech Specs.
388	181	2F	None.	Delete. This is not an inconsistency. It is written against an existing TSPS #181 which was written for clarification only.
389				Number not used.
390	180	2A	None.	Delete. This is not an inconsistency. Change to support a future DCP to change RPS undervoltage trip to prevent spurious trips. The existing numbers in GGNS Tech Specs are more conservative than the recommended change, therefore, considered consistent. Enhancement only.
391	182	2D	None.	Delete. This is not an inconsistency. Change terminology "all rods in" vs. "one rod out". TSPS is for clarification only.
392	N/A	N/A	None.	Delete. Inconsistency with STS in that STS identifies two interlocks. However, the two interlocks listed in STS are not applicable to Grand Gulf. Inconsistent but acceptable.
393	N/A	N/A	None.	Delete. This is not an inconsistency. GE's request was for Bechtel to verify 1140 lb. value which was done.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
394	N/A	N/A	None.	Delete. This is not an inconsistency. Change LCO to prevent loading fuel in a cell with control rod withdrawn/removed. GE's position is that a Tech Spec change is required because two plants in 1982 did not follow the Tech Spec as written. This is an internal administrative problem at those two plants not a Tech Spec problem.
395	046	2F	None.	Delete. This is not an inconsistency. Plant availability enhancement concerning RHR mode during refueling asks for consideration for an operational enhancement only.
396	184	2D	None.	Delete. This is not an inconsistency. Change terminology "Rod-Out-Notch-Override" vs. "Continuous Withdrawal." "Rod-Out-Notch- Override" control refers to a description of the function, not the name of the push button that performs that function.
397	N/A	N/A	None.	Delete. Change Tech Spec 4.4.1.2 to allow test at equal flow vs. equal valve position. This was shown on wrong spec. This is an enhancement under consideration.
398	N/A	N/A	None.	Delete. FSAR and FER give dilution factors for radwaste discharges which do not reflect present plant practices and design. Tech Spec is not changed. DCP program will correct FSAR through normal updates.

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FOOTNOTES - FOR DELETED MATRIX ITEMS

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
399	N/A	N/A	None.	Delete. This is not an inconsistency. Eliminate reload fuel weight percent reference. The BWR/6-STs leaves this number blank and is a site specific number. The reload fuel presently onsite is consistent with the percentage reference in specification as written.
400	N/A	N/A	None.	Delete. The GE STS states that the Met. Tower location is on Figure 5.1.1-1. The Met. Tower location is shown on Figure 5.1.2-1 of the GGNS Tech Spec, however, GGNS Tech Spec Figure 5.1.1-1, Note 4 states that this is the case. This is not an inconsistency.
401	N/A	N/A	None.	Delete. The GGNS Tech Spec states a suppression pool depth of "Approx. 18-19 feet" while the GE STS states "Approx. 20 feet." This is GGNS specific.
402	N/A	N/A	None.	Delete. Currently no mechanism is in place to ensure vessel design parameters. Design, construction, and N-stamp was accomplished per Section III requirements using listed parameters. After code stamping, vessel parameters are maintained by Section XI ISI requirements based on the operational values related to the design parameters.
403	297	2B	None.	Delete. The nominal T ave of 533°F presented in Tech Spec does not appear to agree with temperatures shown in FSAR Figure 5.1-1. Problem is nomenclature clarification.
404	N/A	N/A	None.	Delete. The allowance for uncertainties in Keff equivalent given in the GE STS is not in the GGNS Tech Spec. This is optional in STS and not required.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
405	N/A	N/A	None.	Delete. The GGNS Tech Spec addresses only the center-to-center spacing in the spent fuel storage racks; the FSAR, SER, and "As-Built" also addresses the within-rack spacing. Values are comparable.
406	N/A	N/A	None.	Delete. Standard Technical Specification (GE-STC) require a directive issued by highest level of Corporate Management. GGNS Tech Specs requires a directive by the Senior Vice President. This is GGNS specific.
407	N/A	N/A	None.	Delete. GGNS Tech Spec does not reflect the organizational arrangement for performing and monitoring QA activities as required by GE-STC. Organization chart shows QA interfaces, which is sufficient.
408	N/A	N/A	None.	Delete. PSRC composition in the GGNS Tech Spec and the GE-STC are in conflict. Both the GGNS Tech Spec and the GE-STC are in conflict with actual composition. This is GGNS specific.
409	N/A	N/A	None.	Delete. There is a direct implication that alternates be organizationally tied to members of the PSRC. It is the intent that alternates be qualified in the same manner as members. This is administered by plant procedures.
410	N/A	N/A	None.	Delete. GE-STC states alternates to the PSRC are appointed by the PSRC Chairman. The GGNS Tech Specs requires appointment by the Plant Manager. This is GGNS specific.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
411	N/A	N/A	None.	Delete. STS states reports will be sent to the Director, Office of Resource Management. GGNS Tech Spec does not contain this requirement. GGNS Tech Spec meets intent.
412	N/A	N/A	None.	Delete. Revise Table 3.3.1-2 to add a footnote to describe initial starting point to be used for turbine stop valve closure response time testing. Tech Spec is adequate as written.
413	N/A	N/A	None.	Delete. End-of-cycle recirc pump trip: Time from start of TSV closure or TCV fast closure to complete suppression of the circuit breaker arc varies between the GE Specs and the GGNS Tech Specs. GE Spec changed for GGNS plant specific.
414	N/A	N/A	None.	Delete. GGNS Tech Spec requires individual responsible for reviews must meet or exceed section 4.4 of ANSI 18.1, 1976. This requirement would limit reviews to only a few plant personnel. GGNS Tech Spec should reference ANSI - 18.1, 1976 in its entirety. This is correct.

ATTACHMENT E

EXPANDED MATRIX CONSISTENT/INCONSISTENT - SECTION 1.0

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
1.1	C	C	C	N/A	C	N/A	
1.2	C	C	C	N/A	C	N/A	
1.3	C	C	C	N/A	C	N/A	
1.4	C	C	C	N/A	C	N/A	
1.5	C	C	C	N/A	C	N/A	
1.6	C	C	C	N/A	C	N/A	
1.7	C	C	C	N/A	C	N/A	
1.8	C	C	C	N/A	C	N/A	
1.9	C	C	C	N/A	C	N/A	
1.10	C	C	C	N/A	C	N/A	
1.11	C	C	C	N/A	C	N/A	
1.12	C	C	C	N/A	C	N/A	
1.13	C	C	C	N/A	C	N/A	
1.14	C	C	C	N/A	C	N/A	
1.15	C	C	C	N/A	C	N/A	
1.16	C	C	C	N/A	C	N/A	
1.17	C	C	C	N/A	C	N/A	
1.18	C	C	C	N/A	C	N/A	
1.19	C	C	C	N/A	C	N/A	
1.20	C	C	C	N/A	C	N/A	

ATTACHMENT E

EXPANDED MATRIX CONSISTENT/INCONSISTENT - SECTION 1.0

TECHNICAL SPECIFICATION	OTHER AREAS				OTHER	PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT		
1.21	C	C	C	N/A	C	N/A
1.22	C	C	C	N/A	C	N/A
1.23	C	C	C	N/A	C	N/A
1.24	C	C	C	N/A	C	N/A
1.25	C	C	N/A	N/A	C	N/A
1.26	C	C	C	N/A	C	N/A
1.27	C	C	C	N/A	C	N/A
1.28	C	C	C	N/A	C	N/A
1.29	C	C	C	N/A	C	N/A
1.30	C	C	C	N/A	C	N/A
1.31	C	C	N/A	N/A	C	N/A
1.32	C	C	N/A	N/A	C	N/A
1.33	C	C	C	N/A	C	N/A
1.34	C	C	C	N/A	C	N/A
1.35	C	C	C	N/A	C	N/A
1.36	C	C	C	N/A	C	N/A
1.37	C	C	C	N/A	C	N/A
1.38	C	C	C	N/A	C	N/A
1.39	C	C	N/A	N/A	C	N/A
1.40	C	C	N/A	N/A	C	N/A

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EXPANDED MATRIX CONSISTENT/INCONSISTENT - SECTION 1.0

TECHNICAL SPECIFICATION	OTHER AREAS				PROPOSED ACTION		
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS	OTHER	
1.41	C	C	C	N/A	C	N/A	
1.42	C	C	C	N/A	C	N/A	
1.43	C	C	C	N/A	C	N/A	
1.44	C	C	N/A	N/A	C	N/A	
1.45	C	C	N/A	N/A	C	N/A	
Table 1.1	C	C	C	N/A	C	N/A	
Table 1.2	C	C	C	N/A	C	N/A	

ATTACHMENT F

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EXPANDED MATRIX CONSISTENT/INCONSISTENT - SECTION 2.0

TECHNICAL SPECIFICATION	OTHER AREAS					OTHER	PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS		
2.1	I ¹	I ¹	C	I ¹	N/A	N/A	
2.2	I ²	I ²	C	I ⁴ (3,300)	N/A	I ³ (C)	4 - Submit PCOL

ATTACHMENT E
EXPANDED MATRIX CONSISTENT/INCONSISTENT - SECTION 3/4

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.1.1	I ¹	C	C	C	(301)	N/A	(1)
3/4.1.2	C	C	C	C	C	N/A	
3/4.1.3.1	C	C	C	C	(302) (2,3)	N/A	I ^{2,3}
3/4.1.3.2	C	C	C	C	(303, C ³⁰⁵ , C ³⁰⁴) (306)	N/A	N/A
3/4.1.3.3	I ⁶⁶	C	C	C	(307) (308)	N/A	(309)
3/4.1.3.4	C	C	C	C	(310) C	N/A	N/A
3/4.1.3.5	C	C	C	C	(312, C ³¹³) (311)	N/A	N/A
3/4.1.3.6	C	C	C	C	C	N/A	N/A
3/4.1.4.1	C	C	C	C	C	N/A	(314)
3/4.1.4.2	C	C	C	C	(315) C	N/A	I ¹⁴²
3/4.1.5	I ⁴	C	C	C	I ⁵	C	N/A (316,317,318)
3/4.2.1	I ⁶	C	C	C	C	N/A	N/A
3/4.2.2	I ⁷	C	C	C	C	N/A	N/A
3/4.2.3	I ⁸	I ⁸	C	C	C	N/A	N/A
3/4.2.4	C	C	C	C	C	N/A	N/A
3/4.3.1	I ¹⁷⁵	C	C	C	C	C	I ¹¹ (412)

ATTACHMENT E

EXPANDED MATRIX CONSISTENT/INCONSISTENT - SECTION 3/4

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.3.2	(323, 324) I ²³ 119 151, 170	I ²³	I ^{12,13}	(106,325) I ^{14,15} 16,23,177 24,106,162 134,18,22	I ¹⁷	(325) I ^{19,20} 21	15 - PCOL 84/06, 84/05 18 - PCOL 84/02 20 - PCOL 83/20 24 - PCOL 84/07A 106 - PCOL 84/05
3/4.3.3	(26) I ^{25,29}	I ²⁹	I ²⁹	(326, 327) I ^{15,26} 30,113 114,133 164	I ^{113,115}	(328, 329, 330) N/A	15 - PCOL 84/06, 84/05 25 - PCOL 83/20 114 - PCOL 84/03
3/4.3.4.1	C	C	C ⁽³¹⁾	I ³¹	N/A	N/A	
3/4.3.4.2	I ²⁸	C	C	I ¹⁶³⁽⁴¹³⁾	N/A	N/A ⁽³³¹⁾	
3/4.3.5	I ^{153,} 172	C	C	I ^{30,116}	C ⁽²²⁾	N/A	116 - PCOL 83/23
3/4.3.6	C	C	I ³²	I ³³⁽³³³⁾	N/A ^(335,336)	N/A ^(337, 338)	
3/4.3.7.1	I ^{34,39}	C	C	(53) 16,35 I ^{38,168}	I ³⁶⁽³⁷⁾	I ³⁷	35 - PCOL 84/03 37 - PCOL 84/03
3/4.3.7.2	I ¹⁵⁴	C	C	C	C	I ¹¹⁷	
3/4.3.7.3	C	C	C	C	N/A	N/A	
3/4.3.7.4	C	C	C	C	N/A	I ¹⁴⁷	
3/4.3.7.5	I ^{40,41} 43,44	C	I ^{40,42} 43	I ⁴⁰	N/A ⁽⁴⁴⁾	I ⁴⁶⁽⁴²⁾	43 - PCOL 84/07A
3/4.3.7.6	I ⁴⁷	C	C ⁽⁴⁷⁾	C ⁽⁴⁸⁾	I ⁴⁸	N/A	
3/4.3.7.7	I ⁴⁹	C	C	I ⁴⁹⁽⁵⁰⁾	N/A	I ⁵⁰	
3/4.3.7.8	C	C	C	C	N/A	I ⁵¹	51 - PCOL 84/04

ATTACHMENT E

EXPANDED MATRIX CONSISTENT/INCONSISTENT - SECTION 3/4

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.3.7.9	I ⁵²	C	C	I ⁵²	N/A	N/A	
3/4.3.7.10	C	C	C	C	C	N/A	
3/4.3.7.11	C	C	C	C	N/A	N/A	
3/4.3.7.12	C	C	(53) I ^{36,54}	I ⁵³	I ³⁶	I ¹¹⁸	53 - PCOL 84/05
3/4.3.8	C	C	C	(340) I ^{15,55} I ¹⁶⁰	N/A	N/A	15 - PCOL 84/06, 84/05 55 - PCOL 84/03
3/4.4.1.1	C	C	C	C	N/A	N/A	
3/4.4.1.2	C	C	C	C	I ¹²⁰	N/A	
3/4.4.1.3	C	C	C	C	N/A	N/A	
3/4.4.1.4	I ¹⁷⁴	C	C	C	N/A	N/A ⁽³⁴¹⁾	
3/4.4.2							
3/4.4.2.1	I ⁵⁶	C	C	I ¹⁴⁵	I ⁵⁶	N/A	
3/4.4.2.2	C	C	C	C	N/A	N/A	
3/4.4.3							
3/4.4.3.1	C	C	C ⁽³⁴⁴⁾	C	N/A	N/A ³⁴³	
3/4.4.3.2	C ⁽³⁴⁵⁾	C	C ⁽³⁴⁴⁾	(345) I ^{57,121}	N/A	I ¹⁴⁶	
3/4.4.4	I ¹⁷³	C	C	C	N/A	N/A ³⁴⁶	
GE	C	C	C	C	N/A	I ¹¹⁶	
3/4.4.5	C	C	C	C	N/A	N/A	
3/4.4.6.1	C	C	C	C	N/A ⁽³⁴⁷⁾	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.4.6.2	C	C	C	C	N/A ⁽³⁴⁷⁾	N/A	
3/4.4.7	C	C	C ⁽³⁴⁸⁾	C	I ⁵⁸	I ¹²²	
3/4.4.8	C	C	C	N/A	C	N/A	
3/4.4.9.1	C	C	C	C	C ⁽³⁴⁹⁾	N/A	
3/4.4.9.2	C	C	C	C	C ⁽³⁴⁹⁾	N/A	
3/4.5.1	(152) 59,107 I ¹⁵⁹	C	C ^(350, 351)	59,61 I ¹⁵⁹	C	(353, 354) I ^{60,152}	159 - PCOL 84/C7B 59 - PCOL 84/02
3/4.5.2	C	C	C ⁽³⁵⁵⁾	I ⁶²	C	N/A	
3/4.5.3	C	C	C ⁽³⁵⁷⁾	I ^{62,63}	C ⁽³⁵⁶⁾	I ¹¹²	
3/4.6.1.1	C	C	C ⁽⁶⁴⁾	N/A	N/A	I ⁶⁴	
3/4.6.1.2	C	C	C	N/A	C	I ^{123,124}	
3/4.6.1.3	C	C	I ⁶⁶	I ⁶⁶	C	I ⁶⁵	66 - PCOL 84/06
3/4.6.1.4	C	C	C	I ⁶⁷	N/A	N/A ^(67,358)	
3/4.6.1.5	C	C	I ⁶⁸	C	C	N/A	
3/4.6.1.6	C	C	C	C	C	N/A	
3/4.6.1.7	I ⁶⁹	C	C ⁽⁶⁹⁾	C	N/A ⁽⁶⁹⁾	N/A	
3/4.6.1.8	I ⁷⁰	N/A	C	C	I ⁷⁰	N/A ⁽⁷⁰⁾	
3/4.6.1.9	C	C	C	N/A	C	N/A	
3/4.6.2.1	C	C	C	N/A	I ⁷¹	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.6.2.2	I ⁷²	C	C	N/A	C	N/A	
3/4.6.2.3	C	C	I ⁶⁶	I ⁶⁶	C	N/A	66 - PCOL 84/06
3/4.6.2.4	C	C	C	N/A	C	N/A	
3/4.6.2.5	C	C	C	N/A	C	N/A	
3/4.6.2.6	C	C	C	C	C	N/A	
3/4.6.3.1	I ⁷⁴	C	I ¹⁰⁸	I ⁷⁴	N/A	I ⁷³	
3/4.6.3.2	C	C	I ⁷⁶	C	C	N/A	
3/4.6.3.3	I ¹⁰⁹	C	I ⁷⁷	C	N/A	N/A	
3/4.6.3.4	C	N/A	I ⁷⁸	I ¹⁴³	N/A	I ⁷⁹	
3/4.6.4	I ¹⁶⁹ I ⁽⁸⁰⁾	C	C	I ^{80,158}	C	N/A	158 - PCOL 84/07A
3/4.6.5	C	C	C	C	C	N/A	
3/4.6.6.1	I ¹⁵⁵ I ¹⁵⁶	C	C	N/A	C	N/A	
3/4.6.6.2	I ¹⁶⁸	C	C	C	C	N/A	
3/4.6.6.3	I ¹⁶⁷ , I ¹⁷⁶	C	(362) I ¹²⁶	I ¹²⁶	C	N/A	
3/4.6.7.1	C	C	C	C	C	N/A	
3/4.6.7.2	N/A	C	N/A	N/A	C	N/A	
3/4.6.7.3	I ¹²⁵	C	C	C	C	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.7.1.1	C	C	C	I ¹⁴⁹	C	N/A	
3/4.7.1.2	C	C	I ¹⁴⁸	N/A	C	N/A	
3/4.7.1.3	C	C	C	N/A	C	I ¹⁴⁴	
3/4.7.2	C	C	C ⁽³⁶³⁾	C	C	N/A	
3/4.7.3	C	C	C	C	C	N/A	
3/4.7.4	C	C	C	I ⁸¹	N/A	N/A ^(81, 364)	81 - 021, PCOL 84/03 139, PCOL 83/21
3/4.7.5	C	C	C ⁽³⁶⁵⁾	C	N/A	N/A	
3/4.7.6.1	I ¹⁵⁷	C	C ^(367, 368, 369)	C	N/A	N/A	
3/4.7.6.2	C	C	I ⁸²	I ^{84, 127}	C	N/A	
3/4.7.6.3	C ⁽¹³²⁾	C	C	I ¹³²	N/A	N/A ⁽¹³²⁾	
3/4.7.6.4	C	C	C	I ¹³⁵	C	N/A	
3/4.7.6.5	I ⁸⁵	C	C	I ^{85, 150}	C	N/A	
3/4.7.6.6	C	C	C	C	C	N/A	
3/4.7.7	C	C	I ⁸⁶	C	C	N/A	
3/4.7.8	C	C	I ⁸⁷	I ¹²⁸	I ⁷⁰⁽⁸⁷⁾	N/A	
3/4.7.9	C	I ¹⁷¹	N/A	N/A	C	N/A	
3/4.7.10	C	C	N/A	C	N/A	N/A	
3/4.7.X	N/A	I ¹¹¹	N/A	N/A	N/A	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
			(371, 372, 373, 374, 88, 375, 377)				
3/4.8.1.1	I ^{91,88}	I ⁸⁹	I ^{90,91}	C	C ⁽³⁷⁵⁾	N/A	
3/4.8.1.2	C ⁽⁸⁸⁾	C ⁽⁸⁸⁾	C	C ^(375, 377, 378)	I ^(375, 379)	N/A ⁽³⁷⁵⁾	
3/4.8.2.1	I ^{165 (381)}	C	C ⁽³⁸²⁾	C ⁽³⁸²⁾	C ⁽³⁸⁰⁾	N/A	
3/4.8.2.2	C ⁽³⁸¹⁾	C	C ⁽³⁸²⁾	C ⁽³⁸²⁾	C ⁽³³¹⁾	N/A	
3/4.8.3.1	C ⁽³⁸¹⁾	C	C	C ⁽³⁸³⁾	C	N/A ⁽³⁸¹⁾	
3/4.8.3.2	C	C	C	C	C	N/A ⁽³⁸⁰⁾	
3/4.8.4.1	I ^{(384) 93}	C	C ⁽³⁸⁵⁾	C	C	N/A	
3/4.8.4.2	I ⁹⁴	I ⁹⁴	C ⁽³⁸⁷⁾	I ^{129,130}	N/A	N/A	
3/4.8.4.3	C	C	C	C ^(388,390)	N/A	I ¹³⁷	
3/4.9.1	C ⁽³⁹¹⁾	C	C ⁽³⁹²⁾	C	C	N/A	
3/4.9.2	C	C	C	C ⁽⁹⁵⁾	I ⁹⁵	I ¹¹⁰	
3/4.9.3	C	C	C	C	N/A	N/A	
3/4.9.4	C	C	C	C	N/A	N/A	
3/4.9.5	C	C	C	C	N/A	N/A	

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TECHNICAL SPECIFICATION	OTHER AREAS				OTHER				PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS	OTHER	OTHER	OTHER	
3/4.9.6	C	C	C	I ¹³⁸	N/A			N/A	
3/4.9.7	C ⁽³⁹³⁾	C	C	C	N/A			N/A	
3/4.9.8	C	C	C	I ⁹⁶	N/A			N/A	
3/4.9.9	C	C	C	C	C			N/A	
3/4.9.10	C	C	C	C	C			N/A ⁽³⁹⁴⁾	
3/4.9.11.1	C	C	C	C	C			N/A ⁽³⁹⁵⁾	
3/4.9.11.2	C	C	C	C	C			N/A	
3/4.9.12	C	C	C	C	C			N/A	
3/4.10.1	C	C	C	C	C			C	
3/4.10.2	C	C	C	C	C			N/A	
3/4.10.3	C	C	C ⁽¹¹⁰⁾	C	C			I ¹¹⁰⁽³⁹⁶⁾	
3/4.10.4	C	C	C ⁽³⁹⁷⁾	C	N/A			N/A	
3/4.10.5	C	C	C	C	C			N/A	
3/4.A.A	C	C	N/A	C	C			C	
3/4.11.1.1	C ⁽³⁹⁸⁾	C	I ⁹⁸	N/A	N/A			N/A ⁽³⁹⁸⁾	
3/4.11.1.2	C	C	I ⁹⁸ I ¹³⁹	N/A	C			N/A	
3/4.11.1.3	C	C	I ⁹⁸	N/A	N/A			N/A	
3/4.11.1.4	C	C	I ⁹⁸	N/A	I ⁹⁹			N/A	
3/4.11.2.1	C	C	I ⁹⁸	I ¹⁴⁰	C			I ¹³¹	
3/4.11.2.2	C	C	I ⁹⁸	N/A	N/A			N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.11.2.3	C	C	I ⁹⁸	N/A	N/A	N/A	
3/4.11.2.4	C	C	I ⁹⁸	N/A	C	N/A	
3/4.11.2.5	C	C	I ⁹⁸	N/A	I ⁹⁸	N/A	
3/4.11.2.6	C	C	I ⁹⁸	N/A	I ¹⁰⁰⁽⁹⁸⁾	N/A	
3/4.11.2.7	C	C	I ⁹⁸	N/A	I ¹⁰¹	I ¹⁴¹	
3/4.11.3	C ⁽¹⁰²⁾	C	I ⁹⁸	N/A	N/A	N/A	
3/4.11.4	C	C	I ⁹⁸	N/A	C	C	
3/4.12.1	C	C	I ⁹⁸	N/A	C	C	
Tables							
3/4.12.1-1, -2	C	C	I ⁹⁸	N/A	C	I ¹⁰⁴	
3/4.12.2	C	C	I ⁹⁸	N/A	C	C	
3/4.12.3	C	C	I ⁹⁸	N/A	C	C	
Process Control Program (PCP)	I ¹⁰²	C	N/A	N/A	N/A	C	
Offsite Dose Calculation Manual (ODCM)	C	C	C	N/A	C	C	

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TECHNICAL SPECIFICATION	OTHER AREAS				OTHER	PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT OF TECH SPECS		
5.1.1	C	C	C ⁽⁴⁰⁰⁾	C	N/A ⁽¹⁾	I ^{1,2}
5.1.2	C	C	C	N/A	N/A	I ^{1,2}
5.1.3	C	C	N/A	C	N/A	I ^{1,2}
5.2.1	I ³	C	C ⁽⁴⁰¹⁾	N/A ⁽³⁾	N/A	N/A
5.2.2	C	C	C	C	N/A	N/A
5.2.3	I ³	C	C	N/A ⁽³⁾	N/A	N/A
5.3.1	C	C	C	I ⁴	N/A	N/A ⁽⁴⁾
5.3.2	C	C	C	C	N/A	N/A ⁽³⁹⁹⁾
5.4.1	C	C	C	C ⁽⁴⁰²⁾	N/A	N/A
5.4.2	C ⁽⁴⁰³⁾	C	C ⁽⁴⁰³⁾	C ⁽⁴⁰³⁾	N/A	N/A
5.5						
5.5.1	C	C	C ⁽⁴⁰⁰⁾	C	N/A	N/A
5.6.1	C ⁽⁴⁰⁵⁾	C ⁽⁴⁰⁵⁾	C ⁽⁴⁰⁴⁾	C ⁽⁴⁰⁵⁾	N/A	N/A
5.6.1.b						
5.6.1.2						
5.6.2	C	C	C	I ⁶	N/A	N/A
5.6.3	C	C	C	C	N/A	N/A
5.7.1	I ⁷	C	C ⁽⁷⁾	C ⁽⁷⁾	N/A	N/A

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TECHNICAL SPECIFICATION	EXPANDED MATRIX				OTHER AREAS		PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS	OTHER	
6.1.1	C	C	C	N/A	N/A	N/A	
6.1.2	C	C	C ⁽⁴⁰⁶⁾	N/A	N/A	I ¹	
6.2.1 and Figure 6.2.1-1	I ²	I ²	C ⁽⁴⁰⁷⁾	N/A	N/A	N/A	
6.2.2	I ^{3,1} I ^{6,2}	I ^{3,2}	C ^{14,1}	N/A	I ⁴	N/A	
6.2.3.1	C	C	C	N/A	N/A	N/A	
6.2.3.2	C	C	C	N/A	N/A	I ⁵	
6.2.3.3	C	C	C	N/A	N/A	N/A	
6.2.3.4	C	C	C	N/A	N/A	N/A	
6.2.4.1	C	C	C	N/A	N/A	N/A	
6.3.1	C	C	I ⁵	N/A	N/A	N/A	
6.4.1	C	C	C	N/A	N/A	N/A	
6.5.1.1	I ⁷	C	C	N/A	N/A	N/A ⁽⁷⁾	
6.5.1.2	I ⁷⁽⁸⁾	C	C ^(408, 409)	N/A	N/A	I ⁸	
6.5.1.3	I ⁷	C	C ⁽⁴¹⁰⁾	N/A	N/A	I ⁹⁽⁷⁾	
6.5.1.4	I ⁷	C	C	N/A	N/A	N/A ⁽⁷⁾	
6.5.1.5	I ⁷	C	C	N/A	N/A	N/A ⁽⁷⁾	
6.5.1.6	C	C	I ¹⁰	N/A	N/A	I ¹¹	
6.5.1.7	C	C	C	N/A	N/A	N/A	
6.5.1.8	I ⁷	C	C	N/A	N/A	N/A ⁽⁷⁾	
6.5.2.1	C	C	C	N/A	N/A	N/A	

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TECHNICAL SPECIFICATION	OTHER AREAS				OTHER		PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS		
6.5.2.2.2	I ¹³	I ¹²	C	N/A	N/A	N/A ⁽¹³⁾	
6.5.2.2.3	C	C	C	N/A	N/A	I ¹⁴	
6.5.2.2.4	C	C	C	N/A	I ¹⁵	N/A	
6.5.2.2.5	C	C	C	N/A	N/A	N/A	
6.5.2.2.6	C	C	C	N/A	N/A	N/A	
6.5.2.2.7	I ¹⁶	C	C	N/A	N/A	N/A	
6.5.2.2.8	C	C	I ¹⁷	N/A	N/A	N/A	
6.5.2.2.9	C	C	C	N/A	N/A	N/A	
6.5.2.2.10	C	C	C	N/A	N/A	N/A	
6.5.3.1	C	C	C	N/A	N/A	N/A ⁽⁴¹⁴⁾	
6.6.1	C	C	C	N/A	N/A	N/A	
6.7.1	C	C	C	N/A	N/A	N/A	
6.8.1	I ¹⁹	I ²⁰	I ¹⁹	N/A	N/A	N/A	
6.8.2	C	C	I ²¹	N/A	N/A	N/A	
6.8.3	C	C	C	N/A	N/A	I ¹⁹	
6.9.1	C	C	C	N/A	C	I ¹¹	
6.9.1.1	N/A	N/A	C	N/A	N/A	N/A	
6.9.1.2	C	N/A	C	N/A	N/A	N/A	
6.9.1.3	N/A	N/A	C	N/A	N/A	N/A	
6.9.1.4	C	C	C	N/A	N/A	N/A	

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TECHNICAL SPECIFICATION	OTHER AREAS				OTHER	PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS	
6.9.1.5	C	C	C	N/A	N/A	N/A
6.9.1.6	N/A	N/A	C	N/A	C	N/A
6.9.1.7	N/A	N/A	C	N/A	C	N/A
6.9.1.8	N/A	N/A	C	N/A	C	N/A
6.9.1.9	N/A	N/A	C	N/A	C	N/A
6.9.1.10	N/A	N/A	C ⁽⁴¹¹⁾	N/A	N/A	N/A
6.9.1.11	C	C	C	N/A	C	N/A
6.9.1.12	C	C	C	N/A	C	I ¹¹
6.9.1.13	N/A	N/A	C ⁽¹¹⁾	N/A	C	I ¹¹
6.9.2	N/A	N/A	C	N/A	N/A	N/A
6.10	C	C	C	N/A	N/A	N/A
6.10.1	N/A	N/A	C	N/A	N/A	N/A
6.10.2	N/A	N/A	C	N/A	I ²²	N/A
6.11.1	C	C	N/A	N/A	N/A	N/A
6.12.1	C	C	C	N/A	N/A	N/A
6.12.2	C	C	C	N/A	N/A	N/A
6.13.1	N/A	N/A	C	N/A	N/A	N/A
6.13.2	N/A	N/A	C	N/A	N/A	N/A
6.14	C	C	I ²⁴	N/A	N/A	N/A
6.15.1	N/A	N/A	C	N/A	N/A	I ²³

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TECHNICAL SPECIFICATION	OTHER AREAS				PROPOSED ACTION			
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS	OTHER		
1.1	C	C	C	N/A	C	N/A		
1.2	C	C	C	N/A	C	N/A		
1.3	C	C	C	N/A	C	N/A		
1.4	C	C	C	N/A	C	N/A		
1.5	C	C	C	N/A	C	N/A		
1.6	C	C	C	N/A	C	N/A		
1.7	C	C	C	N/A	C	N/A		
1.8	C	C	C	N/A	C	N/A		
1.9	C	C	C	N/A	C	N/A		
1.10	C	C	C	N/A	C	N/A		
1.11	C	C	C	N/A	C	N/A		
1.12	C	C	C	N/A	C	N/A		
1.13	C	C	C	N/A	C	N/A		
1.14	C	C	C	N/A	C	N/A		
1.15	C	C	C	N/A	C	N/A		
1.16	C	C	C	N/A	C	N/A		
1.17	C	C	C	N/A	C	N/A		
1.18	C	C	C	N/A	C	N/A		
1.19	C	C	C	N/A	C	N/A		
1.20	C	C	C	N/A	C	N/A		
1.21	C	C	C	N/A	C	N/A		

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	FSAR	SER	STS	AS-BUILT	OTHER	
1.22	C	C	C	N/A	C	N/A
1.23	C	C	C	N/A	C	N/A
1.24	C	C	C	N/A	C	N/A
1.25	C	C	N/A	N/A	C	N/A
1.26	C	C	C	N/A	C	N/A
1.27	C	C	C	N/A	C	N/A
1.28	C	C	C	N/A	C	N/A
1.29	C	C	C	N/A	C	N/A
1.30	C	C	C	N/A	C	N/A
1.31	C	C	N/A	N/A	C	N/A
1.32	C	C	N/A	N/A	C	N/A
1.33	C	C	C	N/A	C	N/A
1.34	C	C	C	N/A	C	N/A
1.35	C	C	C	N/A	C	N/A
1.36	C	C	C	N/A	C	N/A
1.37	C	C	C	N/A	C	N/A
1.38	C	C	C	N/A	C	N/A
1.39	C	C	N/A	N/A	C	N/A
1.40	C	C	N/A	N/A	C	N/A
1.41	C	C	C	N/A	C	N/A

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CONSISTENT/INCONSISTENT - SECTION 1.0

TECHNICAL SPECIFICATION	OTHER AREAS OF TECH SPECS				PROPOSED ACTION		
	FSAR	SER	STS	AS-BUILT	OTHER		
1.42	C	C	C	N/A	C	N/A	
1.43	C	C	C	N/A	C	N/A	
1.44	C	C	N/A	N/A	C	N/A	
1.45	C	C	N/A	N/A	C	N/A	
Table 1.1	C	C	C	N/A	C	N/A	
Table 1.2	C	C	C	N/A	C	N/A	

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CONSISTENT/INCONSISTENT - SECTION 2

TECHNICAL SPECIFICATION	OTHER AREAS OF TECH SPECS				OTHER	PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT		
2.1	I ¹	I ¹	C	I ¹	N/A	
2.2	I ²	I ²	C	I ⁴	I ³	4 - Submit PCOL

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CONSISTENT/INCONSISTENT - SECTION 3/4

TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.1.1	I ¹	C	C	C	N/A	N/A	
3/4.1.2	C	C	C	C	C	N/A	
3/4.1.3.1	C	C	C	C	N/A	I ^{2,3}	
3/4.1.3.2	C	C	C	C	N/A	N/A	
3/4.1.3.3	I ¹⁶⁶	C	C	C	N/A	N/A	
3/4.1.3.4	C	C	C	C	N/A	N/A	
3/4.1.3.5	C	C	C	C	N/A	N/A	
3/4.1.3.6	C	C	C	C	N/A	N/A	
3/4.1.4.1	C	C	C	C	N/A	N/A	
3/4.1.4.2	C	C	C	C	N/A	I ¹⁴²	
3/4.1.5	I ^{4,5}	C	C	I ⁵	C	N/A	
3/4.2.1	I ⁶	C	C	C	N/A	N/A	
3/4.2.2	I ⁷	C	I ¹⁰⁵	C	N/A	N/A	
3/4.2.3	I ⁸	I ⁸	C	C	N/A	N/A	
3/4.2.4	C	C	C	C	N/A	N/A	
3/4.3.1	I ¹⁷⁵	C	I ¹⁰	C	C	I ^{9,11}	15 - PCOL 84/06, 84/05 18 - PCOL 84/02 20 - PCOL 83/20 24 - PCOL 84/07A 106 - PCOL 84/05
3/4.3.2	I ^{23, 119, 151, 170}	I ²³	I ^{12,13}	I ^{134,162}	I ¹⁷	I ^{19, 20,21}	
3/4.3.3	I ^{25,29}	I ²⁹	I ²⁹	I ^{113,114, 133,164}	I ^{113,115}	N/A	15 - PCOL 84/06, 84/05 25 - PCOL 83/20 114 - PCOL 84/03

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.3.4.1	C	C	C	I ³¹	N/A	N/A	
3/4.3.4.2	I ²⁸	C	C	I ¹⁶³	N/A	N/A	
3/4.3.5	I ^{153, 172}	C	C	I ^{30, 116}	C	N/A	116 - PCOL 83/23
3/4.3.6	C	C	I ³²	I ³³	N/A	N/A	
3/4.3.7.1	I ^{34, 39}	C	C	I ^{16, 35, 38, 161}	I ³⁶	I ³⁷	35 - PCOL 84/03 37 - PCOL 84/03
3/4.3.7.2	I ¹⁵⁴	C	C	C	C	I ¹¹⁷	
3/4.3.7.3	C	C	C	C	N/A	N/A	
3/4.3.7.4	C	C	C	C	N/A	I ¹⁴⁷	
3/4.3.7.5	I ^{40, 41, 43, 44}	C	I ^{40, 42, 43}	I ⁴⁰	N/A	I ⁴⁶	43 - PCOL 84/07A
3/4.3.7.6	I ⁴⁷	C	C	C	I ⁴⁸	N/A	
3/4.3.7.7	I ⁴⁹	C	C	I ⁴⁹	N/A	I ⁵⁰	
3/4.3.7.8	C	C	C	C	N/A	I ⁵¹	51 - PCOL 84/04
3/4.3.7.9	I ⁵²	C	C	I ⁵²	N/A	N/A	
3/4.3.7.10	C	C	C	C	C	N/A	
3/4.3.7.11	C	C	C	C	N/A	N/A	
3/4.3.7.12	C	C	I ^{36, 54}	I ⁵³	I ³⁶	I ¹¹⁸	53 - PCOL 84/05
3/4.3.8	C	C	C	I ^{15, 55, 160}	N/A	C	15 - PCOL 84/06, 84/05 55 - PCOL 84/03
3/4.4.1.1	C	C	C	C	N/A	N/A	
3/4.4.1.2	C	C	C	C	I ¹²⁰	N/A	

CONSISTENT/INCONSISTENT - SECTION 3/4

TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.4.1.3	C	C	C	C	N/I	N/A	
3/4.4.1.4	I ¹⁷⁴	C	C	C	N/A	N/A	
3/4.4.2.1	I ⁵⁶	C	C	I ¹⁴⁵	I ⁵⁶	N/A	
3/4.4.2.2	C	C	C	C	N/A	N/A	
3/4.4.3.1	C	C	C	C	N/A	N/A	
3/4.4.3.2	C	C	C	I ^{57,121}	N/A	I ¹⁴⁶	
3/4.4.4	I ¹⁷³	C	C	C	N/A	N/A	
3/4.4.5	C	C	C	C	N/A	N/A	
3/4.4.6.1	C	C	C	C	N/A	N/A	
3/4.4.6.2	C	C	C	C	N/A	N/A	
3/4.4.7	C	C	C	C	I ⁵⁸	I ¹²²	
3/4.4.8	C	C	C	N/A	C	N/A	
3/4.4.9.1	C	C	C	C	C	N/A	
3/4.4.9.2	C	C	C	C	C	N/A	
3/4.5.1	I ^{59,107} I ¹⁵⁹	C	C	I ^{61,59} I ¹⁵⁹	C	I ^{60,152}	59 - PCOL 84/02 159 - PCOL 84/07B
3/4.5.2	C	C	C	I ⁶²	C	N/A	
3/4.5.3	C	C	C	I ^{62,63}	C	I ¹¹²	
3/4.6.1.1	C	C	C	N/A	N/A	I ⁶⁴	
3/4.6.1.2	C	C	C	N/A	C	I ^{123,124}	
3/4.6.1.3	C	C	C	I ⁶⁶	C	I ⁶⁵	66 - PCOL 84/06

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.6.1.4	I ⁶⁷	C	C	I ⁶⁷	N/A	N/A	
3/4.6.1.5	C	C	I ⁶⁸	C	C	N/A	
3/4.6.1.6	C	C	C	C	C	N/A	
3/4.6.1.7	I ⁶⁹	C	C	C	N/A	N/A	
3/4.6.1.8	I ⁷⁰	N/A	C	C	I ⁷⁰	N/A	
3/4.6.1.9	C	C	C	N/A	C	N/A	
3/4.6.2.1	C	C	C	N/A	I ⁷¹	N/A	
3/4.6.2.2	I ⁷²	C	C	N/A	C	N/A	
3/4.6.2.3	C	C	C	I ⁶⁶	C	N/A	66 - PCOL 84/06
3/4.6.2.4	C	C	C	N/A	C	N/A	
3/4.6.2.5	C	C	C	N/A	C	N/A	
3/4.6.2.6	C	C	C	C	C	N/A	
3/4.6.3.1	I ⁷⁴	C	I ¹⁰⁸	I ⁷⁴	N/A	I ⁷³	
3/4.6.3.2	C	C	I ⁷⁶	C	C	N/A	
3/4.6.3.3	I ¹⁰⁹	C	I ⁷⁷	C	N/A	N/A	
3/4.6.3.4	C	N/A	I ⁷⁸	I ¹⁴³	N/A	I ⁷⁹	
3/4.6.4	I ¹⁶⁹	C	C	I ^{80,158}	C	N/A	158 - PCOL 84/07A
3/4.6.5	C	C	C	C	C	N/A	
3/4.6.6.1	I ¹⁵⁵ I ¹⁵⁶	C	C	N/A	C	N/A	
3/4.6.6.2	I ¹⁶⁸	C	C	C	C	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.6.6.3	I ¹⁶⁷ , I ¹⁷⁶	C	I ¹²⁶	I ¹²⁶	C	N/A	
3/4.6.7.1	C	C	C	C	C	N/A	
3/4.6.7.2	N/A	C	N/A	N/A	C	N/A	
3/4.6.7.3	I ¹²⁵	C	C	C	C	N/A	
3/4.7.1.1	C	C	C	I ¹⁴⁹	C	N/A	
3/4.7.1.2	C	C	I ¹⁴⁸	N/A	C	N/A	
3/4.7.1.3	C	C	C	N/A	C	I ¹⁴⁴	
3/4.7.2	C	C	C	C	C	N/A	
3/4.7.3	C	C	C	C	C	N/A	
3/4.7.4	C	C	C	I ⁸¹	N/A	N/A	81 - 021, PCOL 84/03 139, PCOL 83/21
3/4.7.5	C	C	C	C	N/A	N/A	
3/4.7.6.1	I ¹⁵⁷	C	C	C	N/A	N/A	
3/4.7.6.2	C	C	I ⁸²	I ^{127,84}	C	N/A	
3/4.7.6.3	C	C	C	I ¹³²	N/A	N/A	
3/4.7.6.4	C	C	C	I ¹³⁵	C	N/A	
3/4.7.6.5	I ⁸⁵	C	C	I ^{85,150}	C	N/A	
3/4.7.6.6	C	C	C	C	C	N/A	
3/4.7.7	C	C	I ⁸⁶	C	C	N/A	
3/4.7.8	C	C	I ⁸⁷	I ¹²⁸	I ⁷⁰	N/A	
3/4.7.9	C	I ¹⁷¹	N/A	N/A	C	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.7.10	C	C	N/A	C	N/A	N/A	
3/4.7.X	N/A	I ¹¹¹	N/A	N/A	N/A	N/A	
3/4.8.1.1	I ^{91,88}	I ⁸⁹	I ^{90,91}	C	C	N/A	
3/4.8.1.2	C	C	C	C	I ¹³⁶	N/A	
3/4.8.2.1	I ¹⁶⁵	C	C	C	C	N/A	
3/4.8.2.2	C	C	C	C	C	N/A	
3/4.8.3.1	C	C	C	C	C	N/A	
3/4.8.3.2	C	C	C	C	C	N/A	
3/4.8.4.1	I ⁹³	C	C	C	C	N/A	
3/4.8.4.2	I ⁹⁴	I ⁹⁴	C	I ^{129,130}	N/A	N/A	
3/4.8.4.3	C	C	C	C	N/A	I ¹³⁷	
3/4.9.1	C	C	C	C	C	N/A	
3/4.9.2	C	C	C	C	I ⁹⁵	I ¹¹⁰	
3/4.9.3	C	C	C	C	N/A	N/A	
3/4.9.4	C	C	C	C	N/A	N/A	
3/4.9.5	C	C	C	C	N/A	N/A	
3/4.9.6	C	C	C	I ¹³⁸	N/A	N/A	
3/4.9.7	C	C	C	C	N/A	N/A	
3/4.9.8	C	C	C	I ⁹⁶	N/A	N/A	
3/4.9.9	C	C	C	C	C	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.9.10	C	C	C	C	C	N/A	
3/4.9.11.1	C	C	C	C	C	N/A	
3/4.9.11.2	C	C	C	C	C	N/A	
3/4.9.12	C	C	C	C	C	N/A	
3/4.10.1	C	C	C	C	C	C	
3/4.10.2	C	C	C	C	C	N/A	
3/4.10.3	C	C	C	C	C	I ¹¹⁰	
3/4.10.4	C	C	C	C	N/A	N/A	
3/4.10.5	C	C	C	C	C	N/A	
3/4.A.A	C	C	N/A	C	C	N/A	
3/4.11.1.1	C	C	I ⁹⁸	N/A	N/A	N/A	
3/4.11.1.2	C	C	I ^{98,139}	N/A	C	N/A	
3/4.11.1.3	C	C	I ⁹⁸	N/A	N/A	N/A	
3/4.11.1.4	C	C	I ⁹⁸	N/A	I ⁹⁹	N/A	
3/4.11.2.1	C	C	I ⁹⁸	I ¹⁴⁰	C	I ¹³¹	
3/4.11.2.2	C	C	I ⁹⁸	N/A	N/A	N/A	
3/4.11.2.3	C	C	I ⁹⁸	N/A	N/A	N/A	
3/4.11.2.4	C	C	I ⁹⁸	N/A	C	N/A	
3/4.11.2.5	C	C	I ⁹⁸	N/A	I ⁹⁸	N/A	
3/4.11.2.6	C	C	I ⁹⁸	N/A	I ¹⁰⁰	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
3/4.11.2.7	C	C	I ⁹⁸	N/A	I ¹⁰¹	I ¹⁴¹	
3/4.11.3	C	C	I ⁹⁸	N/A	N/A	N/A	
3/4.11.4	C	C	I ⁹⁸	N/A	C	C	
3/4.12.1	C	C	I ⁹⁸	N/A	C	C	
Tables							
3/4.12.1-1,2	C	C	I ⁹⁸	N/A	C	I ¹⁰⁴	
3/4.12.2	C	C	I ⁹⁸	N/A	C	C	
3/4.12.3	C	C	I ⁹⁸	N/A	C	C	
Process Control							
Program (PCP)	I ¹⁰²	C	N/A	N/A	N/A	C	
Offsite Dose							
Calculation							
Manual (ODCM)	C	C	C	N/A	C	C	

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CONSISTENT/INCONSISTENT - SECTION 5.0

TECHNICAL SPECIFICATION	OTHER AREAS				OTHER		PROPOSED ACTION
	FSAR	SER	STS	AS-BUILT	OF TECH SPECS		
5.1.1	C	C	C	C	N/A	I ^{1,2}	
5.1.2	C	C	C	N/A	N/A	I ^{1,2}	
5.1.3	C	C	N/A	C	N/A	I ^{1,2}	
5.2.1	I ³	C	C	N/A	N/A	N/A	
5.2.2	C	C	C	C	N/A	N/A	
5.2.3	I ³	C	C	N/A	N/A	N/A	
5.3.1	C	C	C	I ⁴	N/A	N/A	
5.3.2	C	C	C	C	N/A	N/A	
5.4.1	C	C	C	C	N/A	N/A	
5.4.2	C	C	C	C	N/A	N/A	
5.5.1	C	C	C	C	N/A	N/A	
5.6.1	C	C	C	C	N/A	N/A	
5.6.2	C	C	C	I ⁶	N/A	N/A	
5.6.3	C	C	C	C	N/A	N/A	
5.7.1	I ⁷	C	C	C	N/A	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
6.1.1	C	C	C	N/A	N/A	N/A	
6.1.2	C	C	C	N/A	N/A	I ¹	
6.2.1	I ²	I ²	C	N/A	N/A	N/A	
6.2.2	I ^{3,1} I ^{6,2}	I ^{3,2}	C	N/A	I ⁴	N/A	
6.2.3.1	C	C	C	N/A	N/A	N/A	
6.2.3.2	C	C	C	N/A	N/A	I ⁵	
6.2.3.3	C	C	C	N/A	N/A	N/A	
6.2.3.4	C	C	C	N/A	N/A	N/A	
6.2.4.1	C	C	C	N/A	N/A	N/A	
6.3.1	C	C	I ⁵	N/A	N/A	N/A	
6.4.1	C	C	C	N/A	N/A	N/A	
6.5.1.1	I ⁷	C	C	N/A	N/A	N/A	
6.5.1.2	I ⁷	C	C	N/A	N/A	I ⁸	
6.5.1.3	I ⁷	C	C	N/A	N/A	I ⁹	
6.5.1.4	I ⁷	C	C	N/A	N/A	N/A	
6.5.1.5	I ⁷	C	C	N/A	N/A	N/A	
6.5.1.6	C	C	I ¹⁰	N/A	N/A	I ¹¹	
6.5.1.7	C	C	C	N/A	N/A	N/A	
6.5.1.8	I ⁷	C	C	N/A	N/A	N/A	
6.5.2.1	C	C	C	N/A	N/A	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	PROPOSED ACTION
6.5.2.2	I ¹³	I ¹²	C	N/A	N/A	N/A	
6.5.2.3	C	C	C	N/A	N/A	I ¹⁴	
6.5.2.4	C	C	C	N/A	I ¹⁵	N/A	
6.5.2.5	C	C	C	N/A	N/A	N/A	
6.5.2.6	C	C	C	N/A	N/A	N/A	
6.5.2.7	I ¹⁶	C	C	N/A	N/A	N/A	
6.5.2.8	C	C	I ¹⁷	N/A	N/A	N/A	
6.5.2.9	C	C	C	N/A	N/A	N/A	
6.5.2.10	C	C	C	N/A	N/A	N/A	
6.5.3.1	C	C	C	N/A	N/A	N/A	
6.6.1	C	C	C	N/A	N/A	N/A	
6.7.1	C	C	C	N/A	N/A	N/A	
6.8.1	I ¹⁹	I ²⁰	I ¹⁹	N/A	N/A	N/A	
6.8.2	C	C	I ²¹	N/A	N/A	N/A	
6.8.3	C	C	C	N/A	N/A	I ¹⁹	
6.9.1	C	C	C	N/A	C	I ¹¹	
6.9.1.1	N/A	N/A	C	N/A	N/A	N/A	
6.9.1.2	C	N/A	C	N/A	N/A	N/A	
6.9.1.3	N/A	N/A	C	N/A	N/A	N/A	
6.9.1.4	C	C	C	N/A	N/A	N/A	

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TECHNICAL SPECIFICATION	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS		PROPOSED ACTION
						OTHER	
6.9.1.5	C	C	C	N/A	N/A	N/A	
6.9.1.6	N/A	N/A	C	N/A	C	N/A	
6.9.1.7	N/A	N/A	C	N/A	C	N/A	
6.9.1.8	N/A	N/A	C	N/A	C	N/A	
6.9.1.9	N/A	N/A	C	N/A	C	N/A	
6.9.1.10	N/A	N/A	C	N/A	N/A	N/A	
6.9.1.11	C	C	C	N/A	C	N/A	
6.9.1.12	C	C	C	N/A	C	I ¹¹	
6.9.1.13	N/A	N/A	C	N/A	C	I ¹¹	
6.9.2	N/A	N/A	C	N/A	N/A	N/A	
6.10	C	C	C	N/A	N/A	N/A	
6.10.1	N/A	N/A	C	N/A	N/A	N/A	
6.10.2	N/A	N/A	C	N/A	I ²²	N/A	
6.11.1	C	C	N/A	N/A	N/A	N/A	
6.12.1	C	C	C	N/A	N/A	N/A	
6.12.2	C	C	C	N/A	N/A	N/A	
6.13.1	N/A	N/A	C	N/A	N/A	N/A	
6.13.2	N/A	N/A	C	N/A	N/A	N/A	
6.14	C	C	I ²⁴	N/A	N/A	N/A	
6.15.1	N/A	N/A	C	N/A	N/A	I ²³	

X1sd3

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ATTACHMENT F

FOOTNOTES - SECTION 2

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	319	2E	No. The reactor vessel was manufactured using the proper code as identified in the FSAR.	Tech Spec Bases references wrong code date for Rx vessel. Change 1974 code to 1971 Edition thru winter 1972 Addendum.
2	151	3B	No. The high flux trip setpoint of 112.5% in FSAR Table 7.2-1 and as reflected in the SER was based on preliminary values. The Tech. Spec value of 118% is correct and has been verified by GGNS plant specific calculations. The 118% setpoint still provides adequate margin for the GGNS safety limits and yet allow sufficient operating margin. Even though the SER requires revision, the staff safety evaluation and conclusions, should not be altered since the new values represent no real reduction in plant safety.	SER 7.2.2 (and FSAR) states that the APRM high flux trip will be set at no more than 112.5% power. The Tech Spec Table 2.2.1-1 indicate the correct value of 118%.
3	189	2H	No. The requirements exist in the particular Tech Spec. Revising the Bases will be informational only.	Tech Spec Bases need to be revised to include this trip, with final setpoint to be determined by Startup Test Program. (Final setpoint for turbine first stage scram bypass.)
4	015	1B	Yes. A potential exists for being nonconservative when ambient pressure drops below 14.7 psig.	Drywell pressure trip units/transmitters read out in psig units whereas the transmitters are actually absolute pressure transmitters. Variations in barometric pressure need to be considered in setpoints.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	152	2E	No. The Tech Spec is more conservative; this increases the delta k/k required by the FSAR.	FSAR to be revised to .28% delta k/k shutdown margin. Tech Spec is more conservative. FSAR now states .25% delta k/k shutdown margin.
2	241	2D	No. Referencing the Action Statement in the action requirement would be an enhancement to make the use of the Tech Spec easier. The GGNS requirement on inop. rod separation is more conservative than STS. The use of 3.0.3 for SDV inoperability is overly conservative.	<p>(1) Action Statement for immovable control rod should be referenced in action section of Tech Spec rather than just in the surveillance section.</p> <p>(2) Also 3.1.3.b.1.a requires inoperable withdrawn rods be separated from other inop. rods by two cells. It is only necessary to separate them from other inop. <u>withdrawn</u> rods per STS.</p> <p>(3) No specific action statements addressing SDV inoperability requires the use of 3.0.3 which is overly restrictive. Specific action statements should be developed.</p>
3	014	2B	No. Tech Spec as written requires sensor check and functional test.	The Surveillance in Tech Specs is being performed as stated, however, both the Tech Spec & STS indicate the desire for a sensor check via a functional test which does not include the sensor.
4	805	3B	No. The Tech Spec is more conservative than the FSAR requirement.	FSAR needs to be corrected for sodium pentaborate required volume. Tech Spec shows 4,587 gallons; FSAR shows 4,170 gallons. Correct FSAR 9.3.5.3 surveillance test requirements with a loop inop. to match Tech Specs.
5	313	2B	No. This is only a clarification and indicates that there is only one heater per plant design.	Tech Spec 4.1.5.d.4 changes "Heaters" to "normal heater". SLC tank has only one heater for maintaining temperature.
6	300	3A	No. The present MAPLHGR is correct. The FSAR is different due to the method of calculation.	Change FSAR MAPLHGR Limit at 20,000 MWD/T to read 12.6 kw/ft (Table 6.3-6).

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
7	800	3B	No. The Tech Spec scram setpoint is more conservative than that shown in the FSAR.	Change FSAR APRM scrampoint. Tech Spec 3.2.2 vs FSAR Table 7.6-6.
8	806	3B	No. A more realistic analysis for this event is being used on all subsequent BWR-6 analyses which results in a change in CPR of 0.10 (instead of 0.13), thus, providing a MCPR of 1.08 given the operating limit of 1.18. This more realistic analysis is fully applicable to GGNS and is being revised in the FSAR. Even though the SER requires revision, no change to the safety evaluation is necessary, since the revised analysis is acceptable to the NRC on other BWR-6 analyses and it is within the required safety margin of 1.06.	SER 15.4.3 states that the most limiting operating MCPR is 1.21 based on the misloaded fuel bundle accident. The GGNS Tech Specs state the operating MCPR to be 1.18. GGNS FSAR 15.4.7 reflects a similar nonconservative MCPR operating limit.
9	253	2C	No. In Modes 3 and 4, SRM's provide the neutron monitoring function. Although IRM's fulfill a safety function in these modes for SDM checks, the GGNS SDM checks will not be performed until the first refueling outage.	IRM MOC should be 3 instead of 2 in Modes 3 & 4 when shutdown margin has not been established. Grand Gulf has an established shutdown margin.
10	318	3B	No. The intent of the STS is met by GGNS Tech Spec as written. Apparent inconsistency is due to differences in definitions of channels and trip systems.	STS requires 2 channels operable for mode switch, Tech Spec has 1. Depends on MP&L definition of trip system/function.
11	314	2B	No. IRM's provide adequate protection in Mode 4.	Adds Mode 4 to APRM setdown scram requirements. GE considers this to be a non-safety issue.
12	112	2A	No. GGNS Tech Spec as it exists now is more conservative than STS which is the basis for the proposed change.	Adds clarification. Deletes first part of * note, does not change the meaning of the notes. Deletes first part of "with a design providing only one channel per trip system". This will allow GG better operating margin, i.e., will not necessarily have to place a trip system in trip as Tech Spec now requires.
13	212	2D	No. GGNS Tech Spec is more conservative than STS which is the basis for the proposed changes.	STS allows for placing channel in trip vs. entire trip system. Tech Spec is now more restrictive.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
14	315	2B	No. It has not been ascertained that the new values are pertinent to GGNS design.	These setpoint discrepancies need to be resolved for RCIC/RHR steam flow isolation, MSIV low VAC isolation. RCIC/RHR is max allowed value. Setpoints are presently being reviewed by GE and Bechtel.
15	015 016 033	1B 1B 1B	Yes. Under abnormal or worst case conditions a potential exists for being nonconservative.	"Drywell setpoint barometric pressure change issue." Includes TSPS 15, 16, 33. See note 4 section 2.
16	211	2B	No. This is for clarification only and does not effect the acutal system operation.	"Downscale" signal(s) should be "Inop" signal(s).
17	238	2D	No. The intent of the footnote is clear and administrative controls can be effected to eliminate confusion.	Correct typo from 3.6.5.2-1 to 3.6.6.2-1.
18	005	1B	Yes. The absence of MOC would allow operation with the isolation feature inoperable.	Revise Tech Specs to include MOC for RWCU isolation for SLC initiation.
19	013	3A	No. The missing signal is associated with a trip function which is not necessary to initiate actions to mitigate the consequences of an accident.	The MSL high rad inoperable missing from the table.
20	037	1C	No. Rosemont trip units are being calibrated monthly. Calibration information (drift) on the Riley temp. Switches do not indicate need for more frequent calibrations.	Change Riley temp switch cal freq. & Rosemont trip unit cal freq. per vendor recommendations.
21	110	2B	No. Change will be for clarification only. No logic or instrumentation changes will be required.	Adds a clarification footnote to state that the 3-7 sec time delay is already included in the 13-second response time for RCIC isolation logic on Table 3.3.2-2.
22	111	2D	No. The current Tech Spec setpoints result in an isolation at a more conservative value than necessary.	Radiation isolation trip setpoint changes. Reference AECM-83/0565 (PCOL-83/20)

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
23	201	2B	No. The SER is not in error. Note (f) on the secondary containment-manual initiation is being deleted to correct the Tech Specs.	Tech Spec Table 3.3.2-1 presently indicates that mechanical vacuum pumps isolate on manual initiation of the secondary containment isolation valve groups. SER 10.4.2 indicates the mechanical pumps are stopped if effluent releases are detected.
24	308	1B	Yes. The time required to detect a 25 gpm steamleak would be extended.	Table 3.3.2-2. Changes to valve isolation actuation instrumentation setpoints and allowable values for temperatures. Present values do not agree with design calculations.
25	076	1B	Yes. Using the present values in the Tech Spec could allow operation outside the bounds of the accident analysis.	This is inconsistency in ECCS response times between FSAR & Tech Spec. LPCS/LPCI to be 40 sec.
26	316	2B	No. It has not been ascertained that the new numbers are supported by accurate calculations and analysis, and therefore are warranted.	GE wants to change the hi drywell ECCS initiation setpoint & allowable value to 1.73 psig and 1.93 psig respectively.
27				Deleted.
28	802	3B	No. Accident analysis assumes that the EOC-RPT feature is inoperative at power levels below 40%. The reference to 30% power in FSAR 7.6.1.8.1 is incorrect.	Change FSAR to state 40% of rated thermal power for RPT-EOC function; now states 30% power.
29	147	3B	No. The FSAR (Q&R 40.7) and SER 8.4.4 commitment is accurately reflected by Tech Spec Table 3.3.3-2. The allowable values provided in Tech Spec Table 3.3.3-2 represent the allowable maximum and minimum voltage setpoints. The trip setpoint is established as a single value. The minimum and maximum allowable values provide the bounds for safety consideration and a band of minimum and maximum trip setpoints is not necessary. The SER and FSAR are consistent.	SER 8.4.4 (and FSAR) for undervoltage protection require both maximum and minimum values of voltage setpoints and time delays. Tech Spec Table 3.3.3-2 appears to be inconsistent since only single trip setpoint values are provided and maximum and minimum allowable values are given.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
30	114	2B	No. The maximum level is based on pool swell considerations. The increase will provide consistency with design.	Table 3.3.3-2. Setpoint change to suppression pool level-high HPCS and RCIC isolation due to instrument reference elevation revision.
31	022	2A	No. However, the current design would trip a recirc pump by following the present action statements.	ATWS recirc pump trip. Tech Spec has wrong option from STS.
32	199	3B	No. SDV bypass switch rod blocks do not provide a safety function for control rod block instrumentation.	Revise Rod Blocks to be consistent with STS for Scram Discharge Volume bypass switch & mode switch if necessary.
33	011	2B	No. The GGNS design does not include an auto bypass of the detector not-full-in interlock in Range 1.	This change deletes note that says IRM detector full in interlock is bypassed on Range 1. Grand Gulf does not bypass until run mode.
34	803	3B	No. This will allow the FSAR to more clearly reflect the Tech Specs.	Tech Spec Table 3.3.7.1-1 and FSAR Table 11.5-1 do not match. (Rad Mont. Inst). Consider explanatory note as addition to FSAR.
35	198	1C	Yes. In order to ensure operability, 2 channels/trip systems may be required to meet single failure criteria.	Correct Min operable channels for Rad Monitoring.
36	120	2B	No. 2 channels are required operable in Modes 1 and 2 in 3.3.7.1. The only time that 3.3.7.12 offgas system in operation would be required would be after sufficient power history to provide enough decay heat to maintain air ejector operations.	Some minor inconsistencies exist between Tech Spec 3.3.7.1 & 3.3.7.12 but are purely administrative in nature. Reference Problem Sheet 185 and Note 101 for establishing consistency for mode applicability.
37	038	1C	No. Currently the monitors are calibrated annually. Change will ensure they continue to be calibrated annually.	Revise Tech Spec per vendor recommendations. Cal freq of carbon bed vault monitors 18 to 12 months.
38	119	2B	No. Since the dryer storage area ARM is required to be operable in 3.3.7.1-1, then at least one is assumed to be required.	Add to min operable channels "1" to make the Tech Spec complete. There is only one channel.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
39	807	3B	No. The FSAR changes are to effect consistency between the various FSAR sections. A proposed change to Tech Spec 4.3.7.1-1 was requested in AECM-84/0216.	FSAR Change to show proper Surveillance intervals (Sections 11.5.2.3.1; 11.5.2.3.2; 12.3.4.2.7).
40	202	3B	No. Tech Spec is more conservative than required by plant design.	Table 3.3.7.5-1. Proposed change increases the number of required channels of suppression pool temperature monitoring from 6 (1/sector) to 12 (2/sector).
41	327	3B	No. Calibration requirements of Tech Spec are sufficient.	Change FSAR requirements for CTMT/DRWL area rad monitor inst to be sent to vendor for calibration each refueling outage.
42	328	3B	No. The requirement is to have 2 monitors in the containment. In a Mark III, one monitor in the drywell and one in the primary containment (outside drywell) meets the requirement.	Revise Tech Spec to require two each CTMT/DRWL area rad monitors operable, to agree with STS.
43	329	1C	Yes. Rod monitors may not be operable in a mode in which they are potentially needed.	Revise Tech Spec to require post accident rad monitors to be operable in conditions 1, 2, and 3 to agree with STS.
44	330	2B	No. Daily channel checks can be implemented and controlled administratively.	Table 4.3.7.5-1. Proposed change adds daily checks to accident monitoring instrumentation. Reference: FSAR 11.5.2.3.1.
45				Deleted.
46	216	3B	No. Need for Tech Spec changes has not been identified. Item is for tracking performance of additional review.	Resolve operability of post accident monitoring instrumentation per NUREG-0737.
47	251	2F	No. The .7 cps has been previously approved by Amendment 12. Tech Spec 4.9.2.c needs to be changed to provide consistency.	The .7 cps was approved by Amendment 12 and issued by NRC is now inconsistent with the FSAR.

NOTE	TSPTS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
48	009	2B	No. Tech Spec 3.3.7.6 requires operability of SRM's for monitoring purposes only. Tech Spec 3.3.6 which address the trip functions of the SRM's requires 4 operable SRM's in Modes 2 and 5. Whether 3 or 4 SRMs are available for monitoring in Modes 3 and 4 is of no safety concern.	Should be 4 SRMs operable vs 3 for modes 2*, 3, and 4.
49	010	2B	No. Operability of all 5 TIPS can be maintained administratively.	Plant has 5 TIPS vs. 3 as stated in Tech Spec. Change Tech Spec to say 5.
50	050	2B	No. Change needed for clarification only.	The deletion of the requirement to normalize TIPS prior to using for monitoring should be a clarifying issue.
51	285	1C	No. Calibration of detectors more frequently than required by Tech Specs can be controlled administratively.	Change chlorine detector calibration frequency.
52	073 102 304	2B 2B 2D	No. The insuracne requirements are more restrictive than the Tech Spec and are controlled administratively.	Table 3.3.7.9-1. Update Table of fire detection instrumentation and zones in both Tech Spec and FSAR.
53	262	1C	No. However, the SBGT exhaust (release point) should be monitored any time the SBGT system has the capability to release to the environment.	Add SGTS exhaust radiation monitor to Table 3.3.7.12-1.
54	284	2B	No. Existing Tech Spec requirement is consistent with NUREG-0473, Revision 3, Draft 7.	Revise Tech Spec frequency for channel check and channel functional test.
55	054	1B	Yes. With the present MOC, the redundancy of CTMT spray is below a level appropriate for single failure design.	MOC for containment spray.
56	257	2B	No. The inconsistency is conservative.	The Action Statement b of Tech Spec 3/4.4.2 is inconsistent with 3.6.3.1 Action Statement b but is more conservative in that it requires mode switch to shutdown immediately at a pool temp of 105°F with a stuck open valve where the FSAR and Tech Spec 3.6.3.1 allow the temp to go to 110°F.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
57	331	2B	No. This setpoint change is on an interlock that would be used in the steam condensing mode of RHR operation. This is presently not allowed at GGNS.	Table 3.4.3.2-2. Setpoint change for valve interface leakage. E12-F052 to E51-F064. NOTE: This alarm does not provide interface leakage indication.
58	264	2B	No. Inconsistencies of this type are operational considerations rather than safety concerns.	Tech Spec 3.4.7 allows 8 hours to take ACTION and Tech Spec 3.6.4 allows 4 hours under the same conditions.
59	001	1B	Yes. Tech Spec as written would allow operation with an operable equipment configuration which was not considered in accident analysis.	ADS 7 vs 8 valves.
60	317	2E	No. Since the Tech Spec is correct, any error in the Bases has no effect on safety.	Change Bases for HPCS discharge pressure and flow. B3/4 5-1. Tech Spec is correct as written.
61	309 310	2A 2A	No. System relief would provide protection.	LPCS and LPCI high pressure alarm setpoint revisions. Present setpoints too close to system relief valve settings.
62	332	3B	No. The minimum drawdown level is greater than 170,000 gallons required.	Condensate storage tank minimum level change. Stated volume is correct.
63	126	2D	No. This change is administrative in nature, the LCO is still 12'8".	Editorial change to minimum suppression pool level 12'5" vs required 12'8".
64	144	2B	No. Change would be for clarification only. Testing the proper penetration after it has been broken can be controlled administratively.	Clarification to type B testing requirements after a penetration has been broken.
65	235	2B	No. Requirement can be controlled administratively.	Clarification corrects Tech Specs to agree with Appendix J requirements.
66	292 293	1B 1B	Yes. Based on current leak testing acceptance criteria, this change is needed to ensure adequate seal pressure for 30 days with no makeup air supply.	Air lock minimum pressure change from greater than or equal to 60 psig to greater than or equal to 90 psig. Revise Tech Spec.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
67	229	2B	No. Strictly clarification, only the inboard system has heaters.	4.6.1.4.a.2 and c.1 revise for clarification. MSIV LCS heater only on inboard system, not on outboard as implied by STS.
68	166	3B	No. The existing design of the feedwater system has been determined not to be credible drywell bypass leakage path.	Add requirement to functionally test FW leakage control system.
69	801	3B	No. Tech Spec values are correct for accident analysis.	Evaluate equipment qualification program to confirm CTMT to Auxiliary Building Diff. Press. Range. Revise FSAR and NUREG-0588 response.
70	260	3B	No. Previous Mark III analysis determined that CTMT average air temperature can be 95°F without compromising the analyzed accident CTMT pressure and temperature limits.	CTMT avg. air temp. 80°F vs 90°F. Correct FSAR.
71	167	2B	No. Drywell integrity will be maintained if one drywell airlock door is operable. Change would be for clarification.	Resolve differences between LCO 3.6.2.1 and 3.6.2.3.b for drywell integrity. Clarification.
72	172	2B	No. Change would be for clarification only. Drywell bypass leakage requirements would not change.	A/ k is not leakage. Clarification.
73	168	2B	No. Required actions are clear as Tech Spec is presently written.	Specification 3.6.3.1 is unclear with respect to what actions are required in Mode 3.
74	234	3A	No. Tech Spec and plant design are consistent and correct.	FSAR revisions to agree with Tech Spec. Tables for Sup. Pool Volume and instrumentation. Editorial for clarification of suppression pool level instrumentation.
75				Deleted.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
76	169	2D	No. Containment spray sparger was successfully tested during preoperational test.	Add containment spray sparger to Surveillance Requirements.
77	12	2D	No. The need for the more conservative STS requirement has not been confirmed and thus far is not supported.	Action times vary and STS requires 8-hour restoration for 1 loop inop of suppression pool cooling Tech Spec has 7 days.
78	312	2B	No. This is controlled administratively.	STS Surveillance Requirement to verify refueling gates in stored position is not in Tech Specs. Verification if covered by Admin. Proc.
79	83	2B	No. Administrative controls and application of the definition of operability verify that required associated instrumentation is operable to declare suppression pool makeup operable.	Suppression pool makeup instrumentation.
80	20	2B	No. There is significant margin between the primary containment measured leakage rate and the allowable leakage rate as specified in Appendix J to 10 CFR 50.	Change leak test requirements from hydro to air.
81	021 139	1C 1C	No. Snubbers can be added to the surveillance schedule and controlled administratively.	Add one RCIC snubber and non-Q snubbers to snubber table.
82	72	2D	No. This can be controlled administratively.	Add surveillance requirement to verify fire system spray nozzle pattern is unobstructed.
83				Deleted.
84	203	2D	No. Change is editorial only and would not change the location, function or maintenance of the system.	NIP64D140 should be NSP64D140.
85	131	2G	No. Surveillance of all hose stations can be controlled administratively.	Table 3.7.6.5-1 requires update for hose stations for completeness.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
86	277	2B	No. The requirement is implicit and is currently being met administratively.	Requirement to sample fire rated assemblies such that each is inspected once per 15 years is not in the Tech Spec. Covered by GGNS Surveillance Procedures.
87	132	2B	No. Would be an administrative change. The intent of the Tech Spec will not be altered with or without the change.	Delete Equip. not operating column for clarification.
88	804	3B	No. The FSAR sections referenced on the problem sheet are not inconsistent but rather address different capacities. An FSAR change is not required.	This is an inconsistency with the FSAR only, not the SER. Later evaluation determined Tech Spec and as-built to be correct and revision of FSAR is needed. Diesel day tank volume needs to be corrected.
89	808	3B	No. The SER should be updated to reflect the GGNS design for Division 1 & 2 as has been reflected in the FSAR. ICSB-17 (and R.G. 1.9, Rev. 2) only allow engine overspeed and generator differential for trips unless multiple trip signals and coincident logic is used. The low lube oil has coincident logic (2 out of 3), however, the generator ground current has only a single trip signal and therefore, is not in full compliance with the ICSB-17 or R.G. 1.9, Rev. 2. This may affect the NRC evaluation and should be further considered by MP&L for addressing compliance.	SER 8.3.1 does not discriminate between the Division 1 & 2 and 3 D/Gs and allowable D/G trips for emergency operation. Tech Spec 4.8.1.1.2.d.8.b is in accordance with SER for Division 3 (engine overspeed and gen diff. current trips), however, Tech Spec 4.8.1.1.2.d.3.b and FSAR 8.3.1.1.4.1.f.2 allow two additional bypasses to be in place (low lube oil, gen. ground current) during accidents for Divisions 1 & 2. R.G. 1.9 however, only allows the primary bypasses of engine overspeed and gen diff. current.
90	333	2B	No. The sequencing of post-LOCA loads is verified by Tech Spec 4.8.1.1.2.d.7.a)2) albeit with a concurrent LOP signal. However to require verification of sequencing under 4.8.1.1.2.d.12 would be checking the same logic and hardware tested under 4.8.1.1.2.d.7.a)2). This would be redundant and not add to safety.	Proposed change is to add a surveillance requirement to verify load sequencing of offsite power per STS.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
91	335	2B	No. The additional requirements are currently being performed under administrative controls, although there is no requirement to do so in Tech Spec.	Clarification of which revision of Regulatory Guide 1.137 applies. Proposed change to include diesel fuel oil testing requirements. Check for water.
92				Deleted.
93	810	3B	No. This is a software change only to update the FSAR to the Tech Specs and trip setpoints as modified by DCP-82/3173.	FSAR revision required to describe as-built trip setpoints per DCP 82/3173. FSAR Q&R 040.5.c needs to agree with Tech Spec 4.8.4.1.
94	809	3B	No. The MP&L as-built design has three methods to provide overload bypass for MOVs. Each of these methods are in compliance with R.G. 1.106. Even though the SER (and FSAR) discussed only one method of complying to the requirements of R.G. 1.106, the level of plant safety and regulatory compliance is not changed and the conclusions of NRC staff and SER should not be impacted. The FSAR is being modified accordingly.	SER 8.4.3 describes only one method of MOV overload protection bypass to comply with R.G. 1.106. The Tech Specs and as-built allow continuous, accident and manual bypass.
95	251	2F	No. The .7 csp has been previously approved by Amendment 12. Tech Spec 4.9.2.c needs to be changed to provide consistency.	Table 3.3.6-2 Item 3.d and Tech Spec Surveillance 4.3.7.6.c and Tech Spec Surv. 4.9.2.0 are inconsistent.
96	275	2B	No. Water level of 22' 6 3/4" is adequate to satisfy the design basis and would have no significant effect on plant safety.	Tech Spec to be revised to comply with as-built water level of 22' 6-3/4 vs. 23'.
97				Deleted.
98	249	2D	No. Changes are enhancements.	Certain wording enhancements should be implemented upon issuance of NUREG-0473, Draft 7, Revision 3, STS (RETS).
99	249	2D	No. The most conservative reporting requirement can be met until consistency is affected.	Reporting requirement is inconsistent with Technical Specification 6.9.1.12.k.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
100	193	2D	No. The inconsistency requires H ₂ monitoring to be operable at all times which is overly conservative.	Applicability for 3/4.11.2.6 is inconsistent with Technical Specification Table 3.3.7.12-1(2).
101	185	2B	No. Applying operability requirements of the various specifications affecting offgas pretreatment monitor assures the monitor is operable whenever the air ejectors would be in service. The inconsistency causes the Tech Specs to be overly conservative.	Applicability for 3/4.11.2.7 is inconsistent with Technical Specification Table 3.3.7.12-1(6a).
102	249	2D	No. The use of a vendor, with proper administrative controls, is not significant to safety.	FSAR does not address GGNS use of a vendor to perform solidification/dewatering of radwaste.
103				Deleted.
104	249	2D	No. Any additional sample points to meet Reg. Guide 4.8 requirements can be controlled administratively.	Present requirement for air samples locations in X/Q locations is inconsistent with Reg Guide 4.8 which requires air samples to be located in areas with the highest X/Q.
105	158	2D	No. The intent of the GGNS Tech Spec is the same as that of the STS.	GGNS Tech Spec states that "T is always less than 1". STS states "T is applied only when T is less than 1". The T is used in the APRM flow biased scram formula.
106	103	1B	Yes. Present requirement could allow, in the worst case, six channels to be inoperable and not require entry into Action Statement.	MOC for MSIVs on hi flow is acceptable as written, MOC for drain valves from the mainsteam lines MOC needs to be revised.
107	322	2E	No. Inaccuracies in the bases do not alter the accuracy of the LCO or the ability to the subject equipment to perform in accordance with accident analysis.	Change to ADS Bases page 3/4 5-2. Change the Bases with respect to LPCS/LPCI injection pressure into the vessel. Change to state that the reactor pressure is reduced by ADS substantially below the pressure at which LPCI/LPCS inject into the vessel

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
108	321	2B	No. Tech Spec is more conservative than STS by omission of this allowance.	Section 3.6.3.1 of GGNS Tech Spec differs from STS in that STS now has 1 additional action statement with respect to 95°F which places a limit on time and power above 95°F.
109	320	2E	No. The plant design and LCO requirements are based on Bechtel drywell and containment analysis which cites 1060 psig reactor pressure.	Page 3/4 6-4 of the Bases has an incorrect number of 1089 for blow down pressure. Should be 1060 psig which reflects 105% heat balance.
110	323	2B	No. Revoval of shorting links can be controlled administratively from SDM demonstrations.	Tech Specs 3.9.2 and 3.10.3. The RPCS is not an alternate to the shorting links being removed when performing shutdown margin demonstrations in Mode 5. The shorting links were removed for the first shutdown margin demonstration.
111	148	3A	No. The weekly testing in accordance with SRP 10.2 (SER 10.2) is being performed by STI 04-1-03-N32-2. No change to SER 10.2 is required. SER Chapter 16 notes that this should be in Tech Specs. However, SER 10.2 does not indicate the inclusion but should be included in GGNS procedures.	SER 10.2 and 16.0 requires the turbine stop/control valves to be tested every two weeks. The Tech Specs require no turbine stop/control valve testing.
112	234	3A	No. Tech Spec and plant design are consistent and correct.	Suppression Pool Level instrumentation does not clearly reflect FSAR. Need clarification of which instrument channels meet each Tech Spec.
113	075	2B	No. Current setpoint is overly restrictive in that the setpoint is only allowed to vary in one direction from its nominal value.	LPCI B & C Pump discharge pressure High Allowable Value. Allowable value changed for item A.2.f but not for item B.2.e. Change needed for B.2.e.
114	213	1C	Yes. The Tech Spec indicates testing of the wrong function.	Minimum operable channels for manual actuation of each ADS trip system in Tech Spec Table 3.3.3-1 now reads 1/valve - should be 2/system.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
115	116	2B	No. Plant procedures incorporate monthly calibration.	LPCS Pump Discharge Pressure High; trip unit calibration frequency changed to monthly.
116	078	1B	Yes. The RCIC initiation could be defeated if the Tech Spec were misinterpreted.	RCIC minimum operable channels - RCIC Level 2 Trip changed from 2 to 4 minimum operable channels.
117	039	2G	No. These instruments are used "after the fact" to determine the amount of pipe movement after seismic events. They have no active role in initiating protective actions or mitigating accident conditions.	Seismic Monitoring - some monitors could experience larger transients from plant operation than from seismic events.
118	045	2B	No. Approved techniques are being used to determine the setpoints. This item does not affect safe plant operation.	ODCM Setpoints - some setpoints in Table 3.3.7.12-1 not calculated in accordance with ODCM.
119	291	3B	No. Per GE analysis, Tech Spec is adequate. The apparent inconsistency is due to insufficient detail in the FSAR to relate the instrument response times to the analysis.	Maximum MSIV Isolation Times - Allowable times differ in FSAR and Tech Spec.
120	024	2B	No. The current requirement could be misinterpreted to preclude entry into Operational Conditions 1 or 2. This is an operational concern.	Jet Pump Operability - Surveillance requires J.P. proven operable prior to exceeding 25% power. Add 4.0.4 exemption.
121	028	2B	No. Although the table does not specifically address each valve, the surveillance procedures do.	RCS Interface Table 3.4.3.2-1 does not address each specific valve.
122	243	3B	No. A change to the ISI pump and valve program will be made to reflect the proper testing methodology.	MSIV stroke time definition: Tech Spec (ASME Code), GE Design Spec. & FSAR are consistent. Method of testing under section XI is inconsistent with the definition.
123	057	2B	No. Testing frequency will be performed in accordance with Appendix J.	4.0.2 exemption in Tech Spec is inconsistent with Appendix J.

ATTACHMENT F
FOOTNOTES - SECTION 3/4

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
124	294	2B	No. Testing frequency will be performed in accordance with Appendix J. The procedures require summing the leakage.	Containment Leakage Rates - inconsistent with Appendix J requirement for LLRT; does not require all penetration leakage to be summed.
125	019	2B	No. Ensuring the more conservative method is used (SCFM or CFM) is controlled administratively.	Drywell Purge Flowrate Definition - Tech Spec definition is in CFM, should be SCFM (i.e. temperature dependent).
126	062	2E	No. Unless further evaluation indicates that the humidistatically controlled heaters running for 10 cumulative hours will not maintain an acceptable moisture level, no change is needed.	Moisture Control in Charcoal Bed Heaters - 10 hour "cumulative" operation is not sufficient to control moisture; Bases incorrect.
127	245 246	2B 2B	No. This is only editorial in nature and provides clarification.	Spec requires test of dry pipe headers.
128	100	2B	No. This change would increase the qualified life of certain equipment to 40 years.	ESF Electrical Room Maximum Temperature - Bechtel generated 0588 FSAR change from 104°F to 90°F. Other temperatures within Table 3.7.8-1 may not reflect NUREG-0588 assumptions.
129	136	2D	No. Change is to correct typographical errors only, and is purely administrative.	Valve # Typos on Table 3.8.4.2-1.
130	137	2B	No. Change is a clarification of intent only.	Channel Functional Test of MOV Thermal Overload. Change Tech Spec to allow test of bypass circuitry once/92 days; Test of entire channel once/18 months. Presently requires LOCA initiation once/92 days.
131	191	2D	No. NUREG-0473, Rev. 3, Draft 7, specifies only I-131 and I-133 and agrees with the ODCM.	Dose Rate in ODCM - Tech Spec requires calculation using all radioiodines, ODCM only requires 2.
132	299	2B	No. The level can be administratively controlled to have enough CO ₂ to provide 2 discharge and purging of the main generator.	CO ₂ storage tank level - 50% level specified in Tech Spec is not sufficient for "double shot" coverage of the largest room.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
133	303	2B	No. Change is for clarification and can be controlled administratively.	HPCS action statement 33.b indicates 2 trip systems; only 1 trip system of 4 cannels should be indicated.
134	308	1B	Yes. Present sepoins may be too high to affect system isolation soon enough.	Temperature setpoints for Room Hi-Temp and Delta Temp - Bechtel calculations and Tech Spec setpoints are in disagreement.
135	271	2B	No. The weight of the Halon bottles can be increased administratively to provide the required 5% concentration.	Halon Storage Requirements - 95% weight of present Halon bottles may not provide a 5% concentration 10 minutes after discharge and other design features. GGNS Tech Spec requires tests which are not possible for PGCC Halon.
	244	2B		
	247	2B		
136	176	2B	No. The intent of the current Action Statement is to preclude a load drop onto spent fuel. This can be controlled adminstratively.	Crane operation above containment pool-action statement should include suspension of crane operation as is done for the spent fuel pool.
137	226	3A	No. The EPA's are not part of the plant transient response equipment and, therefore, have no effect on the safety analyses.	RPS Electric Power Monitoring Spec: Should the Tech Spec include time delays?
138	035	2C	No. No fuel handling activities are anticipated in the near future and thus it is not of immediate concern. Proposed changes can be controlled administratively.	Refueling platform specs rewritten to be in accordance with GGNS design.
139	190	2D	No. GGNS Tech Spec uses most conservative limit.	Drinking Water - Tech Spec requires analysis if drinking water is taken from Mississippi River within 3 miles from plant discharge. Can reduce allowed limit if greater than 3 miles.
140	138	2D	No. Change is for clarification only. Requirements can be effected administratively.	Radioactive Gaseous Waste Sampling - Two additional sampling points proposed: Radwaste Bldg. vent exhaust and fuel handling area vent exhaust.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
141	185	2B	No. "Hot Standby" is not a defined condition in BWR's. Actions concerning "Hot Standby" can be controlled administratively.	Tech Spec directs operation to go to "Hot Standby" - should be "hot shutdown and then to cold shutdown." Add 4.0.4 exception to 4.11.2.7.2 such that sampling is not required until main condenser air ejector is in service.
142	334	2D	No. This provides clarification to make the wordage consistent with the specific GGNS design.	Revise Tech Spec 3.1.4.2 (Rod Pattern Control System) so that it is more compatible with system design and provides better implementation of RPCS.
143	004	2E	No. The SMPU mode switch is required to be "off" during refueling. In addition, other actions that would deviate from admin controls would also have to occur to open the valves.	There is no mode switch interlock which prevents opening the make-up dump valves as Bases implies.
144	017	2D	No. If the fan is running it is already performing its required safety function.	Need to clarify requirement to start the SSW cooling tower fan from control room when fan is already running.
145	023	2B	No. Administrative controls can be effected to clarify and control equipment requirements.	SRV/LO-LO set Tech Spec does not recognize two trip systems of instrumentation.
146	032	2B	No. Appropriate controls can provide assurance that the intent of the specification is fulfilled even though the specification is confusing.	Generic problems with RCS leakage Tech Spec: inconsistencies and errors.
147	077	2B	No. All equipment controlled from the RSP was tested during the pre-op phase. Specific testing will be performed during the power ascension program that will demonstrate RSP operability.	NRC recommends additional Surveillance Requirements on the remote shutdown panel. FSAR commits to periodic testing.
148	094	2D	No. The present pump ISI surveillance requirements ensure pump operability. The system automatic valves are checked operable during the monthly diesel test.	Add Surveillance Requirement to HPCS Service Water Tech Spec per STS.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
149	173	2D	No. Change would be for clarification only. Equipment required for operability can be controlled administratively.	LCO misleading in references to equipment such as ECCS pump room seal coolers.
150	338	2B	No. Surveillance of all hose stations can be controlled administratively.	Add Hose Stations 53C and 54A.
151	812 816	3B 3B	No. The timer is in the plant and Tech Spec. Its exclusion from the FSAR has no impact. FSAR setpoints being incorrect do not affect the accuracy and consistency between the plant design and Tech Spec.	INEL item 3B. MSL Tunnel Temp Timer is not in FSAR. FSAR values for MSL Flow-High setpoint and range are wrong.
152	233	2E	No. Total developed head presently specified by the Tech Spec may make OPERABILITY determination questionable.	HPCS, LPCS, LPCI pressure/flow values are different in Tech Spec, FSAR, AND SER (I&E Inspection Item). All values are correct, however, the Tech Spec values do not bound pump performance to ensure design requirements. (Portions of this item are being tracked under Note 159, Problem Sheet 344.)
153	820	3B	No. Incorrect FSAR numbers do not affect the accuracy and consistency between plant design and Tech Spec.	RCIC Instrument settings in FSAR Table 7.4-1 differ from Tech Spec setpoints.
154	819	3B	No. This involves correcting a nomenclature problem only.	FSAR 3.7-17 reference to triaxial response spectrum recorders is incorrect. Should be spectrum analyzer.
155	818	3B	No. Administrative controls have been affected to ensure blind flanges and rupture discs are included as part of secondary containment isolation.	Revise FSAR 6.2.3.2 to indicate that blind flanges and rupture discs are also used to isolate secondary containment.
156	817	3B	No. Change to FSAR would be an editorial addition which would have no effect on the system capability.	Revise FSAR 6.2.3.2 to indicate that SGTS has capability to overcome the additional inleakage from a single 4 inch penetration or failure of all non-Q lines 2 inch and under.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
157	827	3B	No. The as-built level setpoint provides the required water volume in the storage tanks.	Revise FSAR 9.5.1.2.1 to correct the fire water storage tank low level makeup water supply setpoint.
158	306	1B	Yes. If the specified closing times for the RWCU valves are not within analytical limits, this may result in a release following an RWCU pipe break in excess of previously analyzed releases.	Add several drywell valves to Tech Spec Table. Investigate analytical stroke time discrepancies.
159	344	1B	No. Total developed head presently specified by Tech Spec may make OPERABILITY determination questionable.	The present specified TDH may not ensure GE design injection requirements.
160	345	2B	No. The high reactor water level turbine trip is an equipment protection function and not does not affect the safety analysis.	Incorrect Allowable Valve for reactor vessel water level turbine trip.
161	349	2D	No. Tech Spec may not be adequate to ensure isolation of the fuel handling area ventilation systems.	The scope of the action statement should be increased to require secondary containment when the fuel handling area radiation monitor is inoperable.
162	350	2B	No. The present ACTION Statement could require unnecessary plant shutdown.	The present ACTION statement would require plant shutdown if inaccessible isolation valves in the drywell were INOPERABLE.
163	357	2B	No. Failure of the by-pass circuitry could defeat the EOC-RPT logic.	There is presently no requirement to calibrate/functionally test the EOC-RPT bypass instrumentation.
164	364	2B	No. The Tech Spec ACTION statement is inconsistent with the system design. There is, however, no safety consideration.	The present ACTION statement implies that there are two trip systems for the HPCS initiation. The GGNS design has only one trip system.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
165	365	2D	No. The performance test performed in lieu of the service test is adequate to demonstrate the OPERABILITY of the batteries.	FSAR commits to R.G. 1.32, Rev. 2. This Reg. Guide, however, requires a service test of the ESF batteries in addition to the performance test. This requirement is not in the GGNS Tech Spec.
166	821	3B	No. The surveillance as performed is in compliance with the BWR-6 design.	FSAR implies that CRD accumulator level is checked weekly. GGNS Tech Specs require pressure verification only.
167	822	3B	No. The GGNS procedures adequately cover the intent of Reg. Guide 1.52, Rev. 2.	Tech Specs do not include all testing required by Reg. Guide 1.52, Rev. 2.
168	823	3B	No. The subject valves are included in Tech Spec Table 3.6.6.2-1.	FSAR Table 7.6-12 does not list all secondary containment isolation valves.
169	824	3B	No. The subject valves are included in Tech Spec Table 3.6.4-1.	FSAR Table 6.2-44 does not list drywell isolation valves.
170	825	3B	No. Tech Spec Table 3.3.2-1 correctly indicates that concurrent signals are required for valve group 9.	FSAR section 5.4.6 does not currently reflect that valve group 9 requires concurrent drywell high pressure and RCIC steam supply pressure - low signal to isolate.
171	826	3B	No. There is no safety impact that results from this discrepancy. Plant procedures currently require surveillance on both pumps. Tech Spec 3.7.9 requires the temperature of the spent fuel pool be maintained below 125°F.	SER Section 9.1.3 states that the spare fuel pool cooling pump will be tested periodically according to the Tech Specs. The GGNS Tech Specs contain no such provisions.
172	828	3B	No. There is no plant safety impact as a result of this discrepancy. Tech Spec 3.3.5 correctly lists the RCIC initiation setpoints.	FSAR Section 7.4.1.1.3.2 indicates that the RCIC system is actuated on a reactor low-water level. The GGNS Tech Spec indicates initiation on Low-Low, Level 2.
173	829	3B	No. The GGNS Tech Specs are consistent with current requirements and commitments.	The GGNS Tech Spec differs from the FSAR regarding reactor water chemistry action statements and surveillances.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
174	830	3B	No. There is no plant safety impact as a result of this discrepancy. Tech Spec 3.4.1.4 accurately lists the 100°F differential limit.	FSAR Section 5.3.3.6.b indicates the coolant temperature difference between dome and bottom head drain is no greater than 145°F. Tech Spec 3.4.1.4 indicates 100°F.
175	831	3B	No. Incorrect FSAR numbers do not affect the accuracy and consistency between plant design and Tech Spec.	RPS response times differ from those in FSAR Table 7.2-5.
176	832	3B	No. The design and the Tech Spec is consistent with divisional separation.	FSAR Section 7.3.1.1.8.2 is incorrect in stating that any manual or auto initiation will start both SGTS trains.
177	372	2B	No. Manual Initiation function is not taken credit for in the Accident Analysis.	Eight Group 6A valves do not isolate from Manual Initiation due to as-built design.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	225	2D	No. The same information that is on the illegible figures can be obtained from other administratively controlled sources.	Illegible figures.
2	105	2E	No. Unrestricted area boundary is not appropriate for gaseous and liquid effluents. This is only a difference in terminology.	Correction of terminology for effluent release boundary vs. unrestricted area boundary.
3	252	3B	No. A special evaluation has shown that the Tech Spec values are consistent with plant design.	The figures for containment and drywell net free air volume in the FSAR are not the same as those in the Tech Spec. Within the FSAR the numbers are not consistent among Tables 1.3-4, 6.2-1, 6.5-6.
4	281	2E	No. The value listed in Tech Specs is a nominal value.	Best available information shows average fuel enrichment (of initial core loading) to be 1.71933% U-235; 1.70% is the maximum value allowed in GGNS Tech Spec. 1.70% is design nominal value; allowable tolerance is $\pm 1.5\%$ of nominal.
5				Deleted.
6	258	3B	No. The spent fuel pool is restricted from normal use for spent fuel until SSW pump capacity is increased.	The spent fuel pool can be partially drained if the valves (G41-F032, F033) are opened while the spent fuel pool gate is removed. The valves are neither locked nor do they have electrical interlocks to prevent inadvertent operation.
7	259	2B	No. Tech Spec is correct. An FSAR change is required. What appeared to be inconsistencies was due to use of different terminology in the different documents.	GGNS Tech Spec Table 5.7.1-1, Vendor Documents, and FSAR Table 3.9-1 do not correlate. The transients/cycles are defined differently in the documents.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	104	2E	No. The title correction does not change the responsibility or authority of any of the plant personnel as described in the FSAR.	Correct title Shift Superintendent to Shift Supervisor.
2	635 101	2E 2E	No. The GGNS organization chart may be modified periodically to reflect the current MP&L/GGNS organization. Even though the SER should be updated; the staff conclusions should not be impacted, the correct organization has been provided to the NRC in AECM-83/0210 (10/26/83) for the FSAR and in AECM-84/0009 (1/18/84) for the Tech Spec.	The organization chart presently contained in SER 13.1.2 is not in accordance with the Tech Spec and is not current.
3	340	2I	No. AECM-82/132 (4/7/72) provided the correct GGNS position i.a.w. the Fed. Register for having at least 8 hours between shifts. Even though the SER and FSAR should be revised accordingly. The NRC is aware of the 8 hour time and this meets the NRC requirement for shift break and should not effect the staff conclusions.	SSER-2 13.1.2 presently states that 02-S-01-4 was revised to reflect a 12 hour break to meet NUREG-0737 I.A.1.3 requirements. The Tech Spec only require a minimum of 8 hours.
4	052	2E	No. The title of the individual holding the position of senior onsite management representative is not safety significant.	Correct Plant Superintendent to Plant Manager.
5	063	2E	No. This is an administrative problem that does not effect plant safety.	Clarify ISEG qualification requirements.
6	339	2I	No. The term "Non-Licensed Operator" is consistent with the title "Auxiliary Operator" with respect to shift crew composition.	FSAR Chap. 18 identifies "Non-Licensed Operators" the GGNS-TS identifies "Auxiliary Operators". The qualifications for these titles are quite different.
7	811	3B	No. The OQAM can be controlled administratively.	OQAM Rev. 3 Section 1.3.10 does not add all PSRC requirements as imposed by the GGNS Tech Spec.
8	106	2E	No. The addition of members to the PSRC is not safety significant.	Adds two additional members to PSRC.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
9	064	2E	No. The qualifications and the length of time an alternate serves can be controlled administratively.	Time frame that an alternate can be used and the qualification of alternates are not addressed.
10	296	2E	No. Any changes would be to clarify the responsibilities of the PSRC. The intended functions of the Tech Specs are being conducted by the PSRC.	PSRC responsibilities in the GGNS Tech Spec disagree with GE-STs requirements.
11	093	2E	No. This ensures reporting requirements are fulfilled and does not affect safety.	Incorporate 10CFR50.72 and 10CFR50.73 reporting requirements into GGNS Tech Spec.
12	814	3B	No. The positions provided by the Tech Specs are virtually identical to the SER, however, the primary discrepancy involves title changes of GGNS/MP&L personnel. This represents the intent of the NRC and a revision to the SER should not require a safety evaluation or a change in staff conclusions.	The SSER-2 13.4 list of SRC members does not fully agree with that provided by the Tech Specs. TSPS 101 and 106 also address inconsistencies to the SER and are similar to above.
13	813	3B	No. The requirements for the Manager of Quality Assurance position have no impact on the safety of operation of the plant.	Requirement for MQA are less restrictive in the OQAM than in the GGNS Tech Spec. MQA is required by GGNS Tech Spec to be a member of the SRC.
14	065	2E	No. The qualifications and the length of time an alternate serves can be controlled administratively.	Time frame that an alternate can be used and the qualification of alternates are not addressed.
15	290	2E	No. This is a typographical error only and does not effect plant safety.	Paragraph 6.5.2.4 of GGNS Tech Spec incorrectly references paragraph 6.5.2.3. The correct reference should be paragraph 6.5.2.2.
16	096	2E	No. Requirement for SRC review of reports of audits of the ALARA Program can be controlled administratively.	FSAR requires semi-annual review of ALARA appraisals by SRC.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
17	295	2E	No. The proposed change in composition of the SRC would ensure that the appropriate people are available to conduct the audit. Any changes made would be for clarification.	Revise GGNS Tech Spec paragraph 6.5.2.8.h to include qualified licensee QA personnel as being responsible for 24 month audit of Fire Protection.
18				Deleted.
19	270	2E	No. The program described in 6.8.3 meets the intent of NUREG-0737. Specific details within the program can be controlled administratively.	Verify GGNS Tech Spec, include NUREG-0737 requirement.
20	146	2E	No. The requirement can be controlled administratively.	SER requires Tech Spec to control work in the control room ceiling in other than cold shutdown.
21	341	3B	No. The current Tech Specs requirement ensure an adequate procedure review.	GGNS Tech Specs do not require each procedure be reviewed by the Plant Manager and PSRC.
22	027	2E	No. This is a typographical error and has no safety significance. The correct reference is easily found.	Correct the reference to the snubber Tech Spec section.
23	088	2D	No. This does not effect plant safety, only reporting requirements.	Clarification needed to determine "Major Changes". Add footnote to provide alternative means for reporting changes in liquid, gaseous, and solid waste treatment systems.
24	249	2D	No. Any changes would be enhancement items and do not effect safety.	Certain enhancements should be implemented upon issuance of NUREG 0473 Draft 7, Revision 3 STS (RETS).

ATTACHMENT F

FOOTNOTES - SECTION 2 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	319	2E	No. The reactor vessel was manufactured using the proper code as identified in the FSAR.	Tech Spec Bases references wrong code date for Rx vessel. Change 1974 code to 1971 Edition thru winter 1972 Addendum.
2	151	3B	No. Tech Spec is correct per GE Spec data sheet 22A3739AE Rev. 4, Sheet 11.	Change FSAR and SER from 112.5% to 118% for APRM trip. Tech Spec is correct.

ATTACHMENT F
FOOTNOTES - SECTION 3/4 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	152	2E	No. The Tech Spec is more conservative; this increases the delta k/k required by the FSAR.	FSAR to be revised to .28% delta k/k shutdown margin. Tech Spec is more conservative. FSAR now states .25% delta k/k shutdown margin.
4	805	3B	No. The Tech Spec is more conservative than the FSAR requirement.	FSAR needs to be corrected for sodium pentaborate required volume. Tech Spec shows 4,587 gallons; FSAR shows 4,170 gallons. Correct FSAR 9.3.5.3 surveillance test requirements with a loop inop to match Tech Spec.
5	313	2B	No. This is only a clarification and indicates that there is only one heater per plant design.	Tech Spec 4.1.5.d.4 changes "Heaters" to "normal heater". SLC tank has only one heater for maintaining temperature.
6	300	3A	No. The present MAPLHGR is correct. The FSAR is different due to the method of calculation.	Change FSAR MAPLHGR Limit at 20,000 MWD/T to read 12.6 kw/ft (Table 6.3-6).
7	800	3B	No. The Tech Spec scram setpoint is more conservative than that shown in the FSAR.	Change FSAR APRM scrampoint. Tech Spec 3.2.2 vs FSAR Table 7.6-6.
8	806	3B	No. The specific Grand Gulf analysis for the fuel load error yields delta MCPR of 0.1; adding a MCPR safety limit of 1.06 would give an operating MCPR limit of 1.16. The Tech Spec value of 1.18 is more conservative.	MCPR limit of 1.18 in Tech Spec is correct. Change SER Section 15.4.3. Fuel load error analysis is not limiting.
23	201	2B	No. The present design is correct, the removal of the note is an editorial modification.	Table 3.3.2-1 change is to delete note (f) for secondary containment manual isolation valve groups. Mechanical vacuum pumps do not trip on manual isolation initiation.
25	076	1B	Yes. Using the present values in the Tech Spec could allow operation outside the bounds of the accident analysis.	This inconsistency is in ECCS response times between FSAR & Tech Spec. LPCS/LPCI to be 40 sec.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
28	802	3B	No. Accident analysis assumes that the EOC-RPT feature is inoperative at power levels below 40%. The reference to 30% power in FSAR 7.6.1.8.1 is incorrect.	Change FSAR to state 40% of rated thermal power for RPT-EOC function; now states 30% power.
29	147	3B	No. The FSAR (Q&R 40.7) and SER 8.4.4 commitment is accurately reflected by Tech Spec Table 3.3.3-2. The allowable values provided in Tech Spec Table 3.3.3-2 represent the allowable maximum and minimum voltage setpoints. The trip setpoint is established as a single value. The minimum and maximum allowable values provided the bounds for safety consideration and a band of minimum and maximum trip setpoints is not necessary. The SER and FSAR are consistent.	SER 8.4.4 (and FSAR) for undervoltage protection require both maximum and minimum values of voltage setpoints and time delays. Tech Spec Table 3.3.3-2 appears to be inconsistent since only single trip setpoint values are provided and maximum and minimum allowable values are given.
34	803	3B	No. This will allow the FSAR to more clearly reflect the Tech Specs.	Tech Spec Table 3.3.7.1-1 and FSAR Table 11.5-1 do not match. (Rad Mont. Inst). Consider explanatory note as addition to FSAR.
39	807	3B	No. The FSAR changes are to effect consistency between the various FSAR sections. A proposed change to Tech Spec 4.3.7.1-1 was requested in AECM-84/0216.	FSAR Change to show proper Surveillance intervals (Sections 11.5.2.3.1; 11.5.2.3.2; 12.3.4.2.7).
40	202	3B	No. Tech Spec is more conservative than required by plant design.	Table 3.3.7.5-1. Proposed change increases the number of required channels of suppression pool temperature monitoring from 6 (1/sector) to 12 (2/sector).
41	327	3B	No. Calibration requirements of Tech Spec are sufficient.	Change FSAR requirements for CTMT/DRWL area rad monitor inst to be sent to vendor for calibration each refueling outage.
43	329	1C	Yes. Rod monitors may not be operable in a mode in which they are potentially needed.	Revise Tech Spec to require post accident rad monitors to be operable in Conditions 1, 2, and 3 to agree with STS.

ATTACHMENT F
FOOTNOTES - SECTION 3/4 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
44	330	2B	No. Daily channel checks can be implemented and controlled administratively.	Table 4.3.7.5-1. Proposed change adds daily checks to accident monitoring instrumentation. Reference: FSAR 11.5.2.3.1.
47	251	2F	No. The .7 cps has been previously approved by Amendment 12. Tech Spec 4.9.2.c needs to be changed to provide consistency.	The .7 cps was approved by Amendment 12 and issued by NRC is now inconsistent with the FSAR.
49	010	2B	No. Operability of all 5 TIPS can be maintained administratively.	Plant has 5 TIPS vs. 3 as stated in Tech Spec. Change Tech Spec to 5.
52	073	2B	No. The insurance requirements are more restrictive than the Tech Spec and are controlled administratively.	Table 3.3.7.9-1. Update Table of fire detection instrumentation and zones in both Tech Spec and FSAR.
	102	2B		
	304	2D		
56	257	2B	No. The inconsistency is conservative.	The Action Statement b of Tech Spec 3/4.4.2 is inconsistent with 3.6.3.1 Action Statement b but is more conservative in that it requires mode switches to shutdown immediately at a pool temp of 105°F with a stuck open valve where the FSAR and Tech Spec 3.6.3.1 allow the temp to go to 110°F.
59	001	1B	Yes. Tech Spec as written would allow operation with an operable equipment configuration which was not considered in accident analysis.	ADS 7 vs. 8 valves.
67	229	2B	No. Strictly clarification, only the inboard system has heaters.	4.6.1.4.a.2 and c.1 revise for clarification. MSIV LCS heater only on inboard system, not on outboard as implied by STS.
69	801	3B	No. Tech Spec values are correct for accident analysis.	Evaluate equipment qualification program to confirm CTMT to Auxiliary Building Diff. Press. Range. Revise FSAR and NUREG-0588 response.

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FOOTNOTES - SECTION 3/4 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
70	260	3B	No. Previous Mark III analysis determined that CTMT average air temperature can be 95°F without compromising the analyzed accident CTMT pressure and temperature limits.	CTMT avg. air temp. 80°F vs. 90°F. Correct FSAR.
72	172	2B	No. Change would be for clarification only. Drywell bypass leakage requirements would not change.	A/ k is not leakage. Clarification.
74	234	3A	No. Tech Spec and plant design are consistent and correct.	FSAR revisions to agree with Tech Spec. Tables for Sup. Pool Volume and instrumentation. Editorial for clarification of suppression pool level instrumentation.
85	131	2G	No. Surveillance of all hose stations can be controlled administratively.	Table 3.7.6.5-1 requires update for hose stations for completeness.
88	804	3B	No. The FSAR sections referenced on the problem sheet are not inconsistent but rather address different capacities. An FSAR change is not required.	This is an inconsistency with the FSAR only, not the SER. Later evaluation determined Tech Spec and as-built to be correct and revision of FSAR is needed. Diesel day tank volume needs to be corrected.
91	335	2B	No. The additional requirements are currently being performed under administrative controls, although there is no requirement to do so in Tech Spec.	Clarification of which revision of Regulatory Guide 1.137 applies. Proposed change to include diesel fuel oil testing requirements. Check for water.
93	810	3B	No. This is a software change only to update the FSAR to the Tech Specs and trip setpoints as modified by DCP 82/3173.	FSAR revision required to describe as-built trip setpoints per DCP 82/3173. FSAR Q&R 040.5.c needs to agree with Tech Spec 4.8.4.1.
94	809	3B	No. FSAR section 7.1.2.6.22 indicates that the Grand Gulf design complies with Regulatory Guide 1.106. This is correct.	FSAR and SER should be changed to properly describe MOV thermal overload bypass circuitry.

ATTACHMENT F
FOOTNOTES - SECTION 3/4 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
102	249	2D	No. The use of a vendor, with proper administrative controls, is not significant to safety.	FSAR does not address GGNS use of a vendor to perform solidification/dewatering of radwaste.
107	322	2E	No. Inaccuracies in the bases do not alter the accuracy of the LCO or the ability to the subject equipment to perform in accordance with accident analysis.	Change to ADS Bases page 3/4 5-2. Change the Bases with respect to LPCS/LPCI injection pressure into the vessel. Change to state that the reactor pressure is reduced by ADS substantially below the pressure at which LPCI/LPCS inject into the vessel.
109	320	2E	No. The plant design and LCO requirements are based on Bechtel drywell and containment analysis which cites 1060 psig reactor pressure.	Page 3/4 6-4 of the Bases has an incorrect number of 1089 for blow down pressure. Should be 1060 psig which reflects 105% heat balance.
119	291	3B	No. Per GE analysis, Tech Spec is adequate. The apparent inconsistency is due to insufficient detail in the FSAR to relate the instrument response times to the analysis.	Maximum MSIV Isolation Times - Allowable times differ in FSAR and Tech Spec.
125	019	2B	No. Ensuring the more conservative method is used (SCFM or CFM) is controlled administratively.	Drywell Purge Flowrate Definition - Tech Spec definition is in CFM, should be SCFM (i.e., temperature dependent).
151	812 816	3B 3B	No. The timer is in the plant and Tech Spec. Its exclusion from the FSAR has no impact. FSAR setpoints being incorrect do not affect the accuracy and consistency between the plant design and Tech Spec.	INEL item 3B. MSL Tunnel Temp Timer is not in FSAR. FSAR values for MSL Flow-High setpoint and range are wrong.
153	820	3B	No. Incorrect FSAR numbers do not affect the accuracy and consistency between plant design and Tech Spec.	RCIC Instrument settings in FSAR Table 7.4-1 differ from Tech Spec setpoints.
154	819	3B	No. This involves correcting a nomenclature problem only.	FSAR 3.7-17 reference to triaxial response spectrum recorders is incorrect. Should be spectrum analyzer.

ATTACHMENT F
FOOTNOTES - SECTION 3/4 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
155	818	3B	No. Administrative controls have been affected to ensure blind flanges and rupture discs are included as part of secondary containment isolation.	Revise FSAR 6.2.3.2 to indicate that blind flanges and rupture discs are also used to isolate secondary containment.
156	817	3B	No. Change to FSAR would be an editorial addition which would have no effect on the system capability.	Revise FSAR 6.2.3.2 to indicate that SGTS has capability to overcome the additional inleakage from a single 4 inch penetration or failure of all non-Q lines 2 inch and under.
157	827	3B	No. The as-built level setpoint provides the required water volume in the storage tanks.	Revise FSAR 9.5.1.2.1 to correct the fire water storage tank low level makeup water supply setpoint.
159	344	1B	No. Total developed head presently specified by Tech Spec may make OPERABILITY determination questionable.	The present specified TDH may not ensure GE design injection requirements.
165	365	2D	No. The performance test performed in lieu of the service test is adequate to demonstrate the OPERABILITY of the batteries.	FSAR commits to R.G. 1.32, Rev. 2. This Reg. Guide, however, requires a service test of the ESF batteries in addition to the performance test. This requirement is not in the GGNS Tech Spec.
166	821	3B	No. The surveillance as performed is in compliance with the BWR-6 design.	FSAR implies that CRD accumulator level is checked weekly. GGNS Tech Specs require pressure verification only.
167	822	3B	No. The GGNS procedures adequately cover the intent of Reg. Guide 1.52, Rev. 2.	Tech Specs do not include all testing required by Reg. Guide 1.52, Rev. 2.
168	823	3B	No. The subject valves are included in Tech Spec Table 3.6.6.2-1.	FSAR Table 7.6-12 does not list all secondary containment isolation valves.
169	824	3B	No. The subject valves are included in Tech Spec Table 3.6.4-1.	FSAR Table 7.2-44 does not list drywell isolation valves.

ATTACHMENT F
FOOTNOTES - SECTION 3/4 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
170	825	3B	No. Tech Spec Table 3.3.2-1 correctly indicates that concurrent signals are required for value group 9.	FSAR section 5.4.6 does not currently reflect that valve group 9 requires concurrent drywell high pressure and RCIC steam supply pressure - low signal to isolate.
172	828	3B	No. There is no plant safety impact as a result of this discrepancy. Tech Spec 3.3.5 correctly lists the RCIC initiation setpoints.	FSAR Section 7.4.1.1.3.2 indicates that the RCIC system is actuated on a reactor low-water level. The GGNS Tech Spec indicates initiation on Low-Low, Level 2.
173	829	3B	No. The GGNS Tech Specs are consistent with current requirements and commitments.	The GGNS Tech Spec differs from the FSAR regarding reactor water chemistry Action Statements and Surveillances.
174	830	3B	No. There is no plant safety impact as a result of this discrepancy. Tech Spec 3.4.1.4 accurately lists the 100°F differential limit.	FSAR Section 5.3.3.6.b indicates the coolant temperature difference between dome and bottom head drain is no greater than 145°F. Tech Spec 3.4.1 indicates 100°F.
175	831	3B	No. Incorrect FSAR numbers do not affect the accuracy and consistency between plant design and Tech Specs.	RPS response times differ from those in FSAR Table 7.2-5.
176	832	3B	No. The design and the Tech Spec is consistent with divisional separation.	FSAR Section 7.3.1.1.8.2 is incorrect in stating that any manual or auto initiation will start both the SGTS trains.

ATTACHMENT F
FOOTNOTES - SECTION 5.0 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
3	252	3B	No. A special evaluation has shown that the Tech Spec values are consistent with plant design.	The figures for containment and drywell net free air volume in the FSAR are not the same as those in the Tech Spec. Within the FSAR the numbers are not consistent among Tables 1.3-4, 6.2-1, 6.5-6.
7	259	2B	No. Tech Spec is correct. An FSAR change is required. What appeared to be inconsistencies was due to use of different terminology in the different documents.	GGNS Tech Spec Table 5.7.1-1, Vendor Documents, and FSAR Table 3.9-1 do not correlate. The transients/cycles are defined differently in the documents.

ATTACHMENT F
FOOTNOTES - SECTION 6.0 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	104	2E	No. The title correction does not change the responsibility or authority of any of the plant personnel as described in the FSAR.	Correct title Shift Superintendent to Shift Supervisor.
2	095 101	2E 2E	No. The GGNS organization chart may be modified periodically to reflect the current MP&L/GGNS organization. Even though the SER should be updated; the staff conclusions should not be impacted, the correct organization has been provided to the NRC in AECM-83/0210 (10/26/83) for the FSAR and in AECM-84/0009 (1/18/84) for the Tech Spec.	The organization chart presently contained in SER 13.1.2 is not in accordance with the Tech Spec and is not current.
3	340	2I	No. AECM-82/132 (4/7/72) provided the correct GGNS position i.a.w. the Fed. Register for having at least 8 hours between shifts. Even though the SER and FSAR should be revised accordingly. The NRC is aware of the 8 hour time and this meets the NRC requirement for shift break and should not effect the staff conclusions.	SSER-2 13.1.2 presently states that 02-S-01-4 was revised to reflect a 12 hour break to meet NUREG-0737 I.A.1.3 requirements. The Tech Spec only require a minimum of 8 hours.
6	339	2I	No. The term "Non-Licensed Operator" is consistent with the title "Auxiliary Operator" with respect to shift crew composition.	FSAR Chap. 18 identifies "Non-Licensed Operators" the GGNS-TS identifies "Auxiliary Operators". The qualifications for these titles are quite different.
7	811	3B	No. The OQAM can be controlled administratively.	OQAM Rev. 3 Section 1.3.10 does not add all PSRC requirements as imposed by the GGNS Tech Spec.
13	813	3B	No. The requirements for the Manager of Quality Assurance position have no impact on the safety of operation of the plant.	Requirement for MQA are less restrictive in the OQAM than in the GGNS Tech Spec. MQA is required by GGNS Tech Spec to be a member of the SRC.

ATTACHMENT F
FOOTNOTES - SECTION 6.0 FSAR INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
16	096	2E	No. Requirement for SRC review of reports of audits of the ALARA Program can be controlled administratively.	FSAR requires semi-annual review of ALARA appraisals by SRC.
19	270	2E	No. The program described in 6.8.3 meets the intent of NUREG-0737. Specific details within the program can be controlled administratively.	Verify GGNS Tech Spec, include NUREG-0737 requirement.

ATTACHMENT F
FOOTNOTES - SECTION 2 AS-BUILT INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	319	2E	No. The reactor vessel was manufactured using the proper code as identified in the FSAR.	Tech Spec Bases references wrong code date for Rx vessel. Change 1974 code to 1971 Edition thru winter 1982 Addendum.
4	015	1B	Yes. A potential exists for being nonconservative when ambient pressure drops below 14.7 psig.	Drywell pressure trip units/transmitters read out in psig units whereas the transmitters are actually absolute pressure transmitters. Variations in barometric pressure need to be considered in setpoints.

ATTACHMENT F
FOOTNOTES - SECTION 3/4 AS-BUILT INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
5	313	2B	No - This is only a clarification and indicates that there is only 1 heater per plant design.	Tech Spec 4.1.5.d.4 changes "Heaters" to "normal heater." SLC tank has only one heater for maintaining temperature.
14	315	2B	No. It has not been ascertained that the new values are pertinent to GGNS design.	These setpoint discrepancies need to be resolved for RCIC/RHR steam flow isolation, MSIV low VAC isolation. RCIC/RHR is max allowed value. Setpoints are presently being reviewed by GE and Bechtel.
15	015	1B	Yes. Under abnormal or worst case conditions a potential exists for being nonconservative.	"Drywell setpoint barometric pressure change issue." Includes TSPS 15, 16, and 33. See note 4 section 2.
	016	1B		
	033	1B		
16	211	2B	No. This is for clarification only and does not effect the actual system operation.	"Downscale" signal(s) should be "Inop" signal(s).
18	005	1B	Yes. The absence of MOC would allow operation with the isolation feature inoperable.	Revise Tech Specs to include MOC for RWCU isolation for SLC initiation.
22	111	2D	No. The current Tech Spec setpoints result in an isolation at a more conservative value than necessary.	Radiation isolation trip setpoint changes. Reference AECM-83/0565 (PCOL-83/20).
23	201	2B	No - The design is correct, the removal of the note is an editorial modification.	Table 3.3.2-1 change is to delete note (f) for secondary containment manual isolation valve groups. Mechanical vacuum pumps do not trip on manual isolation initiation.
24	308	1B	Yes - The time required to detect a 25 gpm steamleak would be extended.	Table 3.3.2-2. Changes to valve isolation actuation instrumentation setpoints and allowable values for temperatures. Present values do not agree with design calculations.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
26	316	2B	No. It has not been ascertained that the new numbers are supported by accurate calculations and analysis, and therefore are warranted.	GE wants to change the hi drywell ECCS initiation setpoint & allowable value to 1.73 psig and 1.93 psig respectively.
30	114	2B	No. The maximum level is based on pool swell considerations. The increase will provide consistency with design.	Table 3.3.3-2. Setpoint change to suppression pool level-high HPCS and RCIC isolation due to instrument reference elevation revisions.
31	022	2A	No. However, the current design would trip a recirc pump by following the present action statements.	ATWS recirc pump trip. Tech Spec has wrong option from STS.
33	011	2B	No. The GGNS design does not include an auto bypass of the detector not-full-in interlock in Range 1.	This change deletes note that says IRM detector full in interlock is bypassed on Range 1. Grand Gulf does not bypass until run mode.
35	198	1C	Yes. In order to ensure operability, 2 channels/ trip system may be required to meet single failure criteria.	Correct Min. operable channels for Rad. Monitoring.
38	119	2B	No. Since the dryer storage area ARM is required to be operable in 3.3.7.1-1, then at least one is assumed to be required.	Add to min operable channels "1" to make the Tech Spec complete. There is only one channel.
40	202	3B	No. The Tech Spec is more conservative than required by plant design.	Table 3.3.7.5-1. Proposed change increases the number of required channels of suppression pool temperature monitoring from 6 (1/sector) to 12 (2/sector).
49	010	2B	No. Operability of all 5 TIPs can be maintained administratively.	Plant has 5 TIPs vs. 3 as stated in Tech Spec. Change Tech Spec to say 5.
52	073	2B	No. The insurance protection requirements are more restrictive than Tech Spec and are controlled administratively.	Table 3.3.7.9-1. Update Table of fire detection instrumentation and zones in both Tech Spec and FSAR.
	102	2B		
	304	2D		

ATTACHMENT F
FOOTNOTES - SECTION 3/4 AS-BUILT INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
53	262	1C	No. However, the SGBT exhaust (release point) should be monitored any time the SGBT system has the capability to release to the environment.	Add SCTS exhaust radiation monitor to Table 3.3.7.12-1.
55	054	1B	Yes. With the present MOC, the redundancy of CTMT spray is below a level appropriate for single failure design.	MOC for containment spray.
57	331	2B	No. This setpoint change is on an interlock that would be used in the steam condensing mode of RHR operation. This is presently not allowed at GGNS.	Table 3.4.3.2-2. Setpoint change for valve interface leakage. E12-F052 to E51-F064. NOTE: This alarm does not provide interface leakage indication.
59	001	1B	Yes. Tech Spec as written would allow operation with an operable equipment configuration which was not considered in accident analysis.	ADS 7 vs 8 valves.
61	309 310	2A 2A	No. System relief would provide protection.	LPCS and LPCI high pressure alarm setpoint revisions. Present setpoints too close to system relief valve settings.
62	332	3B	No. The minimum drawdown level is greater than 170,000 gallons required.	Condensate storage tank minimum level change. Stated volume is correct.
63	126	2D	No. This change is administrative in nature, the LCO is still 12'8".	Editorial change to minimum suppression pool level 12'5" vs required 12'8".
66	292 293	1B 1B	Yes. Based on current leak testing acceptance criteria, this change is needed to ensure adequate seal pressure for 30 days with no makeup air supply.	Air lock minimum pressure change from greater than or equal to 60 psig to greater than or equal to 90 psig. Revise Tech Spec.
67	229	2B	No. Strictly clarification, only the inboard system has heaters.	4.6.1.4.a.2 and c.1 revise for clarification. MSIV LCS heater only on inboard system, not on outboard as implied by STS.

ATTACHMENT F
FOOTNOTES - SECTION 3/4 AS-BUILT INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
74	234	3A	No. Tech Spec and plant design are consistent and correct.	FSAR revisions to agree with Tech Spec. Tables for Sup. Pool Volume and instrumentation. Editorial for clarification of suppression pool level instrumentation.
80	20	2B	No. There is significant margin between the primary containment measured leakage rate and the allowable leakage rate as specified in Appendix J to 10 CFR 50.	Change leak test requirements from hydro to air.
81	021 139	1C 1C	No. Snubbers can be added to the surveillance schedule and controlled administratively.	Add one RCIC snubber and non-Q snubbers to snubber table.
84	203	2D	No. Change is editorial only and would not change the location, function or maintenance of the system.	N1P64D140 should be NSP64D140.
85	131	2G	No. Surveillance of all hose stations can be controlled administratively.	Table 3.7.6.5-1 requires update for hose stations for completeness.
96	275	2B	No. Water level of 22' 6 3/4" is adequate to satisfy the design basis and would have no significant effect on plant safety.	Tech Spec to be revised to comply with as-built water level of 22' 6-3/4 vs 23'.
106	103	1B	Yes. Present requirement could allow, in the worst case, six channels to be inoperable and not require entry into Action Statement.	MOC for MSIVs on hi flow is acceptable as written, MOC for drain valves from the mainsteam lines MOC needs to be revised.
113	075	2B	No. Current setpoint is overly restrictive in that the setpoint is only allowed to vary in one direction from its nominal value.	LPCI B & C Pump discharge pressure High Allowable Value. Allowable value changed for item A.2.f but not for item B.2.e. Change needed for B.2.e.
114	213	1C	Yes. The Tech Spec indicates testing of the wrong function.	Minimum operable channels for manual actuation of each ADS trip system in Tech Spec Table 3.3.3-1 now reads 1/valve - should be 2/system.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
116	078	1B	Yes. The RCIC initiation could be defeated if the Tech Spec were misinterpreted.	RCIC minimum operable channels - RCIC Level 2 Trip changed from 2 to 4 minimum operable channels.
121	028	2B	No. Although the table does not specifically address each valve, the surveillance procedures do.	RCS Interface Table 3.4.3.2-1 does not address each specific valve.
126	062	2E	No. Unless further evaluation indicates that the humidistatically controlled heaters running for 10 cumulative hours will not maintain an acceptable moisture level, no change is needed.	Moisture Control in Charcoal Bed Heaters - 10 hour "cumulative" operation is not sufficient to control moisture; Bases incorrect.
127	245 246	2B 2B	No. This is only editorial in nature and provides clarification.	Tech Spec requires test of dry pipe headers.
128	100	2B	No. This change would increase the qualified life of certain equipment to 40 years.	ESF Electrical Room Maximum Temperature - Bechtel generated 0588 FSAR change from 104°F to 90°F. Other temperatures within Table 3.7.8-1 may not reflect NUREG-0588 assumptions.
129	136	2D	No. Change is to correct typographical errors only and is purely administrative.	Valve # Typos on Table 3.8.4.2-1.
130	137	2B	No. Change is a clarification of intent only.	Channel Functional Test of MOV Thermal Overload. Change Tech Spec to allow test of bypass circuitry once/92 days; test of entire channel once/18 months. Presently requires LOCA initiation once/92 days.
132	299	2B	No. The level can be administratively controlled to have enough CO ₂ to provide 2 discharges and purging of the main generator.	CO ₂ storage tank level - 50% level specified in Tech Spec is not sufficient for "double shot" coverage of the largest room.
133	303	2B	No. Change is for clarification and can be controlled administratively.	HPCS Action Statement 33.b indicates 2 trip systems; only 1 trip system of 4 channels should be indicated.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
134	308	1B	Yes. Present setpoints may be too high to affect system isolation soon enough.	Temperature setpoints for Room Hi-Temp and Delta Temp - Bechtel calculations and Tech Spec setpoints are in disagreement.
135	271 244 247	2B 2B 2B	No. The weight of the Halon bottles can be increased administratively to provide the required 5% concentration.	Halon Storage Requirements - 95% weight of present Halon bottles may not provide a 5% concentration 10 minutes after discharge and other design features. GGNS Tech Spec requires tests which are not possible for PGCC Halon.
138	035	2C	No. No fuel handling activities are anticipated in the near future and thus it is not of immediate concern. Proposed changes can be controlled administratively.	Refueling platform specs rewritten to be in accordance with GGNS design.
140	138	2D	No. Change is for clarification only. Requirements can be effected administratively.	Radioactive Gaseous Waste Sampling - Two additional sampling points proposed; Radwaste Building vent exhaust and fuel handling area vent exhaust.
143	004	2E	No. The SMPU mode switch is required to be "off" during refueling. In addition, other actions that would deviate from admin controls would also have to occur to open the valves.	There is no mode switch interlock which prevents opening the make-up dump valves as Bases implies.
145	023	2B	No. Administrative controls can be effected to clarify and control equipment requirements.	SRV/LO-LO set Tech Spec does not recognize two trip systems of instrumentation.
149	173	2D	No. Change would be for clarification only. Equipment required for operability can be controlled administratively.	LCO misleading in references to equipment such as ECCS pump room seal coolers.
150	338	2B	No. Surveillance of all hose stations can be controlled administratively.	Add Hose Stations 53C and 54A.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENT
158	306	1B	Yes. If the specified closing times for the RWCU values are not within analytical limits, this may result in a release following an RWCU pipe break in excess of previously analyzed releases.	Add several drywell valves to Tech Spec Table. Investigate analytical stroke time discrepancies.
159	344	1B	No. Total developed head presently specified by Tech Spec may make OPERABILITY determination questionable.	The present specified TDH may not ensure GE design injection requirements.
160	345	2B	No. The high reactor water level turbine trip is an equipment protection function and not does not affect the safety analysis.	Incorrect Allowable Valve for reactor vessel water level turbine trip.
161	349	2D	No. Tech Spec may not be adequate to ensure isolation of the fuel handling area ventilation systems.	The scope of the action statement should be increased to require secondary containment when the fuel handling area radiation monitor is inoperable.
162	350	2B	No. The present ACTION Statement could require unnecessary plant shutdown.	The present ACTION statement would require plant shutdown if inaccessible isolation valves in the drywell were INOPERABLE.
163	357	2B	No. Failure of the by-pass circuitry could defeat the EOC-RPT logic.	There is presently no requirement to calibrate/functionally test the EOC-RPT bypass instrumentation.
164	364	2B	No. The Tech Spec ACTION statement is inconsistent with the system design. There is, however, no safety consideration.	The present ACTION statement implies that there are two trip systems for the HPCS initiation. The GGNS design has only one trip system.
177	372	2B	No. Manual Initiation function is not taken credit for in the Accident Analysis.	Eight Group 6A valves do not isolate from Manual Initiation due to as-built design.

ATTACHMENT F
FOOTNOTES - SECTION 5.0 AS-BUILT INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
4	281	2E	No. The value listed in Tech Specs is a nominal value.	Best available information shows average fuel enrichment (of initial core loading) to be 1.71933% U-235; 1.70% is the maximum value allowed in GGNS Tech Spec. 1.70% is design nominal value; allowable tolerance is $\pm 1.5\%$ of nominal.
6	258	3B	No. The spent fuel pool is restricted from normal use for spent fuel until SSW pump capacity is increased.	The spent fuel pool can be partially drained if the valves (G41-F032, F033) are opened while the spent fuel pool gate is removed. The valves are neither locked nor do they have electrical interlocks to prevent inadvertent operation.

ATTACHMENT F
FOOTNOTES - SECTION 2 SER INCONSISTENCIES

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NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
1	319	2E	No. The reactor vessel was manufactured using the proper code as identified in the FSAR.	Tech Spec Bases references wrong code date for Rx vessel. Change 1974 code to 1971 Edition thru winter 1972 Addendum.
2	151	3B	No. The high flux trip setpoint of 112.5% in FSAR Table 7.2-1 and as reflected in the SER was based on preliminary values. The Tech Spec value of 118% is correct and has been verified by GGNS plant specific calculations. The 118% setpoint still provides adequate margin for the GGNS safety limits and yet allow sufficient operating margin. Even though the SER requires revision, the staff safety evaluation and conclusions, should not be altered since the new values represent no real reduction in plant safety.	SER 7.2.2 (and FSAR) states that the APRM high flux trip will be set at no more than 112.5% power. The Tech Spec Table 2.2.1-1 indicate the correct value of 118%.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
8	806	3B	No. A more realistic analysis for this event is being used on all subsequent BWR-6 analyses which results in a change in CPR of 0.10 (instead of 0.13), thus, providing a MCPR of 1.08 given the operating limit of 1.18. This more realistic analysis is fully applicable to GGNS and is being revised in the FSAR. Even though the SER requires revision, no change to the safety evaluation is necessary, since the revised analysis is acceptable to the NRC on other BWR-6 analyses and it is within the required safety margin of 1.06.	SER 15.4.3 states that the most limiting operating MCPR is 1.21 based on the misloaded fuel bundle accident. The GGNS Tech Specs state the operating MCPR to be 1.18. GGNS FSAR 15.4.7 reflects a similar nonconservative MCPR operating limit.
23	201	2B	No. The SER is not in error. Note (f) on the secondary containment-manual initiation is being deleted to correct the Tech Specs.	Tech Spec Table 3.3.2-1 presently indicates that mechanical vacuum pumps isolate on manual initiation of the secondary containment isolation valve groups. SER 10.4.2 indicates the mechanical pumps are stopped if effluent releases are detected.
29	147	3B	No. The FSAR (Q&R 40.7) and SER 8.4.4 commitment is accurately reflected by Tech Spec Table 3.3.3-2. The allowable values provided in Tech Spec Table 3.3.3-2 represent the allowable maximum and minimum voltage setpoints. The trip setpoint is established as a single value. The minimum and maximum allowable values provide the bounds for safety consideration and a band of minimum and maximum trip setpoints is not necessary. The SER and FSAR are consistent.	SER 8.4.4 (and FSAR) for undervoltage protection require both maximum and minimum values of voltage setpoints and time delays. Tech Spec Table 3.3.3-2 appears to be inconsistent since only single trip setpoint values are provided and maximum and minimum allowable values are given.

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
89	808	3B	No. The SER should be updated to reflect the GGNS design for Division 1 and 2 as has been reflected in the FSAR. ICSB-17 (and R.G. 1.9, Rev. 2) only allow engine overspeed and generator differential for trips unless multiple trip signals and coincident logic is used. The low lube oil has coincident logic (2 out of 3), however, the generator ground current has only a single trip signal and therefore, is not in full compliance with ICSB-17 or R.G. 1.9, Rev. 2. This may affect the NRC evaluation and should be further considered by MP&L for addressing compliance.	SER 8.3.1 does not discriminate between the Division 1 and 2 and 3 D/Gs for allowable D/G trips for emergency operation. Tech Spec 4.8.1.1.2.d.8.b is in accordance with SER for Division 3 (engine overspeed and gen diff. current trips), however, Tech Spec 4.8.1.1.2.d.8.b and FSAR 8.3.1.1.4.1.f.2 allow two additional bypasses to be in place (low lube oil, gen. ground current) during accidents for Divisions 1 and 2. R.G. 1.9 however, only allows the primary bypasses of engine overspeed and gen diff. current.
94	809	3B	No. The MP&L as-built design has three methods to provide overload bypass for MOVs. Each of these methods are in compliance with R.G. 1.106. Even though the SER (and FSAR) discussed only one method of complying to the requirements of R.G. 1.106, the level of plant safety and regulatory compliance is not changed and the conclusions of NRC staff and SER should not be impacted. The FSAR is being modified accordingly.	SER 4.3 describes only one method of MOV overload protection bypass to comply with R.G. 1.106. The Tech Spec and as-built allow continuous, accident and manual bypass.
111	148	3A	No. The weekly testing in accordance with SRP 10.2 (SER 10.2) is being performed by STI 04-1-03-N32-2. No change to SER 10.2 is required. SER Chapter 16 notes that this should be in Tech Spec. However, SER 10.2 does not indicate the inclusion but should be included in GGNS procedures.	SER 10.2 and 16.0 requires the turbines stop/control valves to be tested every two weeks. The Tech Spec requires no turbine stop/control valve testing.
171	826	3B	No. There is no safety impact that results from this discrepancy. Plant procedures currently require surveillance on both pumps. Tech Spec 3.7.9 requires the temperature of the spent fuel pool be maintained below 125°F.	SER Section 9.1.3 states that the spare fuel pool cooling pump will be tested periodically accordingly to the Tech Specs. The GGNS Tech Spec contain no such provisions.

ATTACHMENT F
FOOTNOTES - SECTION 6.0 SER INCONSISTENCIES

Page 1 of 1

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
2	095 101	2E 2E	No. The GGNS organization chart may be modified periodically to reflect the current MP&L/GGNS organization. Even though the SER should be updated; the staff conclusions should not be impacted, the correct organization has been provided to the NRC in AECM-83/0210 (10/26/83) for the FSAR and in AECM-84/0009 (1/18/84) for the Tech Specs.	The organization chart presently contained in SER 13.1.2 is not in accordance with the Tech Spec and is not current.
3	340	2I	No. AECM-82/132 (4/7/82) provided the correct GGNS position in accordance with the Fed. Register for having at least 8 hours between shifts. Even though the SER and FSAR should be revised accordingly. The NRC is aware of the 8 hour time and this meets the NRC requirement for shift break and should not effect the staff conclusions.	SSER-2 13.1.2 presently states that 02-S-01-4 was revised to reflect a 12 hour break to meet NUREG-0737 I.A.1.3 requirements. The Tech Specs only require a minimum of 8 hours.
12	814	3B	No. The position provided by the Tech Specs are virtually identical to the SER, however, the primary discrepancy involves title changes of GGNS/MP&L personnel. This represents the intent of the NRC and a revision to the SER should not require a safety evaluation or a change in staff conclusions.	The SSER-2 13.4 list of SRC members does not fully agree with that provided by the Tech Spec. TSPS 101 and 106 also address inconsistencies to the SER and are similar to above.
20	146	2E	No. The requirement can be controlled administratively.	SER requires Tech Spec to control work in the control room ceiling in other than cold shutdown.

ATTACHMENT G

	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	TOTAL
<u>SECTION 1.0</u>							
Total	0	0	0	N/A	0	N/A	0
Priority 1	0	0	0	N/A	0	N/A	0
Priority 2	0	0	0	N/A	0	N/A	0
Priority 3	0	0	0	N/A	0	N/A	0
<u>SECTION 2.0</u>							
Total	2	2	0	2	N/A	1	7
Priority 1	0	0	0	1	N/A	0	1
Priority 2	1	1	0	1	N/A	1	4
Priority 3	1	1	0	0	N/A	0	2
<u>SECTION 3/4</u>							
Total	54	7	41	66	18	33	219
Priority 1	4	0	1	18	0	4	27
Priority 2	17	1	34	43	16	24	135
Priority 3	33	6	6	5	2	5	57

	FSAR	SER	STS	AS-BUILT	OTHER AREAS OF TECH SPECS	OTHER	TOTAL
<u>SECTION 5.0</u>							
Total	3	0	0	2	N/A	6	11
Priority 1	0	0	0	0	N/A	0	0
Priority 2	1	0	0	1	N/A	6	8
Priority 3	2	0	0	1	N/A	0	3
<u>SECTION 6.0</u>							
Total	14	5	6	N/A	3	11	39
Priority 1	0	0	0	N/A	0	0	0
Priority 2	7	4	5	N/A	3	11	30
Priority 3	7	1	1	N/A	0	0	9
<u>TOTAL TECH SPEC *</u>							
Total	73	14	47	70	21	51	276*
Priority 1	4	0	1	19	0	4	28
Priority 2	26	6	39	45	19	42	177
Priority 3	43	8	7	6	2	5	71

* There is no relationship between number of inconsistencies and number of problem sheets due to "double-counting".

Note: Not all Tech. Spec. problem sheets represent inconsistencies, and therefore are not included in this matrix.

Cspds

ATTACHMENT H

ATTACHMENT H

FSAR INCONSISTENCY SUMMARY

TECH SPEC	FSAR NOTE #	TSPS #	SETPOINT/ PARAMETER #1	EDIT./ INTERNAL #2	FSAR vs. ASBLT #3	ORGANI- ZATIONAL #4	MISCEL- LANEOUS #5	TECH SPEC INAC. #6
2.1	1	319						X
2.2	2	151	X					
3/4.1.1	1	152	X					
3/4.1.3.3	166	821	X					
3/4.1.5	4	805	X					
	5	313						X
3/4.2.1	6	300		X				
3/4.2.2	7	800	X					
3/4.2.3	8	806	X					
3/4.3.1	175	831	X					
3/4.3.2	23	201						X
	119	291					X	
	151	812		X				
		816	X					
	170	825		X				
3/4.3.3	25	076						X
	29	147					X	
3/4.3.4.2	28	802		X				
3/4.3.5	153	820	X					
	172	828		X				
3/4.3.7.1	34	803						X
	39	807	X					
3/4.3.7.2	154	819		X				
3/4.3.7.5	40	202			X			
	41	327	X					
	43	329						X
	44	330						X
3/4.3.7.6	47	251					X	
3/4.3.7.7	49	010						X
3/4.3.7.9	52	073						X
		102			X			
		304						X
3/4.4.1.4	174	830	X					
3/4.4.2.1	56	257						X
3/4.4.4	173	829		X				
3/4.5.1	59	001						X
	107	322						X
	159	344						X
3/4.6.1.4	67	229						X
3/4.6.1.7	69	801	X					
3/4.6.1.8	70	260		X				
3/4.6.2.2	72	172	X					
3/4.6.3.1	74	234			X			
3/4.6.3.3	109	320						X
3/4.6.4	169	824			X			
3/4.6.6.1	155	818			X			
	156	817					X	
3/4.6.6.2	168	823		X				

ATTACHMENT H

FSAR INCONSISTENCY SUMMARY (Continued)

TECH SPEC	FSAR NOTE #	TSPS #	SETPOINT/ PARAMETER #1	EDIT./ INTERNAL #2	FSAR vs. ASBLT #3	ORGANI- ZATIONAL #4	MISCEL- LANEOUS #5	TECH SPEC INAC. #6
3/4.6.6.3	167	822	X					
	176	832			X			
3/4.6.7.3	125	019						X
3/4.7.6.1	157	827	X					
3/4.7.6.5	85	131			X			
3/4.8.1.1	88	804		X				
	91	335		X				
3/4.8.2.1	165	365						X
3/4.8.4.1	93	810					X	
3/4.8.4.2	94	809			X			
PCP	102	249						X
5.2.1	3	252		X				
5.2.3	3	252		X				
5.7.1	7	259	X					
6.2.1	2	095				X		
		101				X		
6.2.2	1	104						X
	2	095				X		
		101				X		
	3	340		X				
	6	339				X		
6.5.1.1	7	811				X		
6.5.1.2	7	811				X		
6.5.1.3	7	811				X		
6.5.1.4	7	811				X		
6.5.1.5	7	811				X		
6.5.1.8	7	811				X		
6.5.2.2	13	813				X		
6.5.2.7	16	096						X
6.8.1	19	270						X
55	73	78	17	14	8	12	5	22
	(66 Sep. Notes)	(70 Sep. Sheets)	30%	25%	14%	22%	9%	
			22%	18%	10%	15%	7%	28%
					56	78		

REV. D

ATTACHMENT I

Attachment I

INCONSISTENCIES: FSAR vs. AS-BUILT PLANT

Page 1 of 3

NOTE	TSPS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
52	073 102 3G4	2B 2B 2D	Purely editorial. Renaming of zones does not alter fire protection requirements or measures provided. Overall SER conclusions are not impacted.	FSAR Figure 9A-22 does not correctly identify fire detection zones. The design documentation does identify the zones correctly. (Applies to diesel generator buildings.)
74 112	234	3A	The FSAR discussion should be expanded to clarify reference to narrow range instrument. The clarification of the high and low water level alarm input should not alter overall conclusions in the SER (7.5.2).	The FSAR 6.2.7.5 does not clearly reflect the suppression pool level instrumentation, i.e., which instrument provides high and low level alarms. Narrow range instrumentation not described. Arrangement of sensors requires clarification.
85	131	2G	Second column line is an editorial error. There can be only one location for a single hose station. Area is provided necessary fire protection measures. No impact on SER overall conclusions.	FSAR Figure 9.5-4 incorrectly lists a second column line for a single hose station.
94	809	3B	Methods employed in GGNS design meet requirements of Reg. Guide 1.106, i.e., the acceptance criteria in SER 8.4.3. Therefore, SER conclusions are not impacted.	FSAR 7.1.2.c.22 does not fully describe methods used for providing thermal overload protection to safety-related MOV's.
155	818	3B	Barriers such as these are considered acceptable based on MP&L/Bechtel evaluation of BTP CSB 6-3. The omission of the discussion of the use of blind flanges and rupture discs does not impact the overall SER conclusions (SER 6.2.2).	FSAR does not indicate that blind flanges and rupture discs are used in secondary containment boundary (FSAR 6.2.3.2).

NOTE	TSPTS #	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
158	306	1B	<p>Categories "a" through "e" include discrepancies which are purely editorial, dealing with information or changes to information which do not bear significantly on the overall acceptance of the plant's containment isolation provisions.</p> <p>Category "f" - none of the affected valves have stroke times used in GGNS safety analysis. Therefore, these changes do not affect the containment isolation system and do not impact the SER's overall conclusions.</p> <p>Category "g" - In all cases changes are proposed to correct or clarify the application of signals which are system specific, e.g., deleting references to signals which open LPCI injection valves (not isolation signals). No signals are deleted which cause valve closure for the automatic containment isolation function. The proposed changes correct the table but do not alter the acceptability of containment isolation system or the overall SER conclusions.</p>	<p>Numerous corrections and clarifications proposed to FSAR Table 6.2-44, "Containment Isolation Valves." The items fall into the following categories:</p> <ul style="list-style-type: none"> a) Penetration sizes incorrect or not indicated in Table. b) Divisional power supply incorrectly labeled. c) Valves incorrectly labeled as inboard or outboard. d) Direction of flow in line incorrect. e) Valve position under certain circumstances not expressed consistently throughout Table (e.g., "Closed" vs. "fail closed"). f) Valve closure times in the Tables were revised to be consistent with GGNS Tech Specs. This included roundoff of values, elimination of stroke times for valves with no automatic closure, and increases/decreases in stroke time, consistent with the GGNS Tech Spec values. g) Isolation signals of some valves listed incorrectly or in a confusing manner.

ATTACHMENT I

INCONSISTENCIES: FSAR vs. AS-BUILT PLANT

Page 3 of 3

NOTE	TSPS#	PRIORITY	SAFETY SIGNIFICANCE	COMMENTS
40	202	3B	RPS and, thus the subject temperature monitoring instrumentation, has class 1E power available Post-LOCA via operator action. This aspect of RPS is accurately described in FSAR Table 040.27-1. It has been estimated that this action can be accomplished in less than 10 minutes. The GGNS design provides for no required operator action within the first 10 minutes; therefore, this post accident information would not be required until power was restored (if lost). Based on this discussion, the overall conclusions of SER 7.5.1 are not considered to be altered. However, this issue will be referred to Nuclear Plant Engineering for inclusion into the Reg. Guide 1.97, Revision 2, evaluation. Full compliance with this guide is required by February, 1985.	FSAR Table 7.5-1 describing Safety Related Display Instrumentation indicates that suppression pool temperature monitoring instrumentation is provided with a Class 1E power supply. Other FSAR sections state or imply this also. This is only partially correct. The normal power supply is the RPS bus (BOP power). Class 1E power is available through operator action (alternate RPS power supply).
176	832	3B	This is a clarification. As described in the FSAR, both SGTS trains start on an automatic isolation signal. However on manual initiation (used for testing), only the affected train starts. Per the accident assumptions described in FSAR Chapters 6 and 15 and per SER 6.2.2, only one SGTS train was assumed operable to prevent an unfiltered release. The concurrent starting of both trains on auto is unaffected. The overall conclusions of the SER are considered to be unaltered.	Both SGTS trains will start upon receipt of an automatic isolation signal as described in FSAR subsection 7.3.1.1.8.2. However, clarification is needed to explain that a manual initiation (used for testing) of one of the SGTS control systems will only start the equipment associated with that control system train.

ATTACHMENT J

3/4.3.2 Isolation Actuation Instrumentation (21 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
12	112	2A	STS difference - trip channel
13	212	2D	STS difference - trip channel
14	315	2B	As-built difference - setpoint discrepancies
15	015	1B	As-built difference - setpoint
	016	1B	compensation
	033	1B	
16	211	2B	As-built difference - trip signal differences
17	238	2D	As-built differences - typo
18	005	1P	As-built difference - MOC
19	013	3A	Other difference - missing trip signal
20	037	1C	Other difference - calibration frequency change
21	110	2B	Other difference - footnote clarification
22	111	2D	As-built difference - trip setpoint change
23	201	2B	FSAR, SER, As-built difference - delete trip not in GG design
24	308	1B	As-built difference - change setpoints and allowable values
106	103	1B	As-built difference - MOC
119	291	3B	FSAR difference - allowable times discrepancy
134	308	1B	As-built difference - setpoint changes
151	812	3B	FSAR difference - MSL temperature
	816	3B	timer missing in FSAR
162	350	2B	As-built difference - Action Statement wording <u>re</u> inaccessible DW valves
170	825	3B	FSAR differences
177	372	2B	As-built difference - Valves do not isolate on manual containment isolation.

3/4.3.3 Emergency Core Cooling System Actuation Instrumentation (13 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
15	015 016 033	1B 1B 1B	As-built difference - setpoint compensation
25	076	1B	FSAR difference - inconsistent LPCS/LPCI ECCS response times
26	316	2B	As-built difference - setpoint changes
29	147	3B	FSAR, SET, STS difference - max/min limits - voltage sensors and time delays
30	114	2B	As-built difference - setpoint change
113	075	2B	As-built, other areas differences - changes to allowable values
114	213	1C	As-built difference - MOC
115	116	2B	Other areas difference - trip unit calibration frequency change
133	303	3B	Other areas differences - definition of trip systems
164	364	2B	As-built difference - wording implies 2 HPCS trip systems while GG has 1 HPCS trip system.

3/4.3.7.1 Radiation Monitoring Instrumentation (8 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
16	211	2B	As-built difference - trip signal differences
34	803	3B	FSAR difference - GGTS and FSAR Table discrepancies
35	198	1C	As-built difference - MOC
36	120	2D	Other areas difference - minor Admin. discrepancies
37	038	1C	Other difference - calibration frequency change
38	119	2B	As-built difference - MOC
39	807	3B	FSAR difference - Surveillance interval discrepancies
161	349	2D	As-built difference - Action Statement needs change when FHA radiation monitor inoperable

3/4.3.7.5 Accident Monitoring Instrumentation (9 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
40	202	3B	FSAR, STS, As-built difference - required channels change
41	327	3B	FSAR difference - vendor calibration cntm/drwl arm
42	328	3B	STS difference - MOC
43	329	1C	FSAR, STS difference - Op conditions discrepancies
44	330	2B	FSAR difference - add daily instrument checks
46	216	3B	Other difference - clarification regarding NUREG-0737 on operability

3/4.3.7.12 Radioactive Gaseous Effluent Monitoring Instrumentation (5 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
36	120	2D	STS, as-built differences - minor admin. discrepancies
53	262	1C	As-built difference - add SGTS rad. monitor
54	284	2B	STS difference - channel functional check and test
118	045	2B	Other - setpoint discrepancies

3/4.5.1 ECCS Operating (8 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
59	001	1B	FSAR, As-built differences - 7 vs. 8 ADS
60	317	2E	Other - change Bases, HPCS discharge pressure/flow
61	309	2A	As-built difference - LPCS/LPCI
	310	2A	alarm setpoint changes
107	322	2E	FSAR difference - change Bases: ADS & LPCS/LPCI injection pressure
152	233	1B	Other - HPCS, LPCS, LPCI pressure/flow value differences
159	344	1B	As-built difference - TDH specified may not ensure design injection requirements

3/4.8.1.1 A.C. Sources - Operating (5 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
88	804	3B	FSAR difference - diesel day tank volume discrepancy
89	808	3B	SER difference - D/G trips not correctly described
90	333	2B	STS difference - STS adds Surveillance - sequencing offsite loads
91	335	2B	FSAR, As-built difference - Regulatory Guide 1.137 clarification; Test for water in diesel fuel

6.2.2 Unit Staff (7 I's)

<u>NOTE</u>	<u>TSPS</u>	<u>PRIORITY</u>	<u>SUMMARY</u>
1	104	2E	FSAR difference - position title discrepancy
2	095	2E	FSAR, SER difference - revise
	101	2E	organization chart
3	340	2I	FSAR, SER difference - discrepancy regarding break time
4	052	2E	Other areas - position title discrepancy
6	339	2I	FSAR difference - position title difference