50-498/499

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 27, 1996

Mr. William T. Cottle
Executive Vice-President &
General Manager, Nuclear
Houston Lighting & Power Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: STAFF COMMENTS ON THE SOUTH TEXAS APPLICATION FOR CONVERSION TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS (TAC NOS. M95529 AND M95530)

Dear Mr. Cottle:

The staff has reviewed your proposed license amendment dated June 4, 1996, to convert the South Texas Project Technical Specifications to the Improved Standard Technical Specifications format. The staff has identified numerous instances of requested changes that are: 1) beyond the scope of the conversion process, 2) not adequately justified from a technical standpoint, 3) claimed to be administrative but are actually less restrictive, or 4) claimed to be consistent with NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," which are not. The staff has documented examples from each section of your application of instances where the submittal needs to be improved. These examples are contained in the enclosure to this letter. Note that these examples are not all-inclusive. The staff has identified cases within each section where additional information is needed. However, there are still a number of discrepancies in your submittal that are not specifically identified here.

In addition, in some cases, the proposed conversion submittal does not accurately reflect recently approved changes to the STP current Technical Specifications (TS). Please submit new TS pages for any recently approved TS changes to ensure that the staff's review of your conversion submittal is accurate and more efficient. Further, please provide a plan for how you will handle TS changes that are currently under review by the staff or future changes which have not been submitted yet, which will be approved prior to issuance of the conversion amendment.

I suggest that once you have read through the enclosure and better understand where the staff has concerns regarding your submittal, that a meeting be set up to further clarify our concerns. It is our expectation that you will

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revise or supplement your submittal prior to the staff continuing review of this request. If you have any questions regarding information in the attachment, please call Janet Kennedy at 301-415-3267.

Sincerely,

William D. Beckner

William D. Beckner, Director
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: Summary of Issues Identified During Review of STP Conversion Amendment

cc w/encl: See next page

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Sincerely,

ORIGINAL SIGNED BY:

William D. Beckner, Director
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

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Enclosure: Summary of Issues Identified During Review of STP Conversion Amendment

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NAME	JKennedy/cf JK	CHawes CH	CGrimes	WBeckner WDB
DATE	11/26/96	11/27/96	11/27/96	11/27/96
COPY	YES NO	YES NO	YES NO	YES NO

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SUMMARY OF ISSUES IDENTIFIED DURING REVIEW OF STP CONVERSION AMENDMENT

Section 1.0

- In the definition of DOSE EQUIVALENT I-131, the licensee proposes to move the dose conversion factors identified in the CTS as 1.11 (and is included in NUREG 1431) to the Bases. The licensee states that," ...Movement of details such as these to the Bases is consistent with the intent of NUREG 1431. Changes to the Bases will be subject to the controls described in Chapter 5 of the proposed specifications, and 10 CFR 50.59. These controls are adequate to assure the level of safety will be maintained." This change was a Technical Specification Task Force (TSTF) change to the STS that was recently rejected.

  The licensee should supplement the application with a listing of all generic changes (TSTFs) to NUREG-1431 and augment the reply from W. Harrison to J. Kennedy with a clear position regarding the disposition of any rejected or pending changes. In addition, the licensee should provide a matrix of the CTS, STS, and DOCs to facilitate review of the markups.

- The licensee is proposing to combine the definitions of Analog CHANNEL OPERATIONAL TESTS (COT) and Digital COTs by adding the words, "...as close to the sensor as practicable," and "or the exercise of the digital hardware using data base manipulation," to the new definition of CHANNEL OPERATIONAL TESTS. This change appears to be less restrictive in that part of the definition of Digital COTs is deleted in the new definition. This change also is not adequately justified from a technical standpoint.

- The licensee has eliminated the definition STAGGERED TEST BASIS although present in the CTS and NUREG 1431. The licensee's termed this change a "Technical Change, less restrictive." The licensee states "...This change does not reduce the reliability of the components or systems being tested. The change is based on a number of studies which demonstrated staggered testing 1) is operationally difficult, 2) has negligible impact on component reliability, 3) is not as significant as initially thought, and 4) has no impact on failure frequency.... This change is considered less restrictive because it provides flexibility in the test intervals for components or systems." This change appears to be a substantial generic issue which is beyond the scope of the conversion review.

Section 2.0

- Reactor Core Safety Limits Bases Section 2.1.1: The licensee has added one full page of background information on "departure from nucleate boiling (DNB)." The licensee's justification for the deviation is "Changes have been made (additions, deletions and/or changes to the NUREG) to reflect the facility specific nomenclature, number, reference, system description, or analysis description." This change does not appear to be a simple administrative change and requires additional justification to clarify the purpose for the added Bases explanation.

ENCLOSURE

Section 3.0

- The Bases for LCO 3.0.3 have been changed to add a statement regarding the impact of initiating a dual unit shutdown as a result of entering LCO 3.0.3 simultaneously for both units. This change is a generic issue that the staff has addressed in guidance in the Enforcement Manual. There does not appear to be a plant-unique reason to depart from the STS in this respect.

- The licensee identifies the change to CTS 3.0.4 as providing the same direction as the existing sentence which has been reworded to be consistent with NUREG-1431. This change is identified as having DOCs A.5 and L.3. This change does not appear administrative nor is it consistent with NUREG-1431. In addition, DOC L.3 is not included in our package.

- The proposed change to CTS 3.0.6 to clarify that equipment may also be returned to service to demonstrate that required variables are within limits is not administrative nor is it consistent with NUREG-1431. This change was the subject of TSTF-01 which has been rejected by the staff.

Section 3.1

- The licensee claims that the proposed change to CTS 3.1.3 to delete Figure 3.1.3-1, MTC Versus Power Level, is consistent with the "philosophy" of NUREG-1431. NUREG-1431 still contains this figure (Figure 3.1.4.1) and the justification does not appear to support a plant-unique reason to relocate this detail from the technical specifications.

- The proposed change to CTS 3.1.4 to delete the word "all" from "...with all individual indicated rod positions..." is the subject of TSTF-11 which was rejected by the staff.

- The proposed change to CTS 3.1.4 to delete reference to "group counter step demand" is not consistent with NUREG-1431. This change appears to be less restrictive rather than administrative, and the justification for the change is not adequate.

- The licensee is proposing to delete CTS 3.1.9, PHYSICS TESTS Exceptions Mode 1. This change is the subject of the staff's review of TSTF-12 which is pending.

- CTS 4.10.3.2 requires the Intermediate and Power Range nuclear instrument channels to be subjected to an analog channel operational test (COT) within 12 hours prior to initiating physics testing. The licensee is proposing SR 3.1.8.1 to require the performance of a COT within 72 hours of initiating physics testing. NUREG-1431 requires a COT within 12 hours. This change does not have adequate technical justification.

Section 3.2

- The licensee is proposing to delete required action A.2 of NUREG-1431 TS 3.2.1 regarding the reduction of Axial Flux Difference (AFD) acceptable operation limits by the percentage $F_Q(Z)$ exceeds the limit. The licensee's only justification is that the NSSS vendor says plants with constant axial offset control do not need this. This change does not have adequate technical justification.

- The licensee is proposing to delete Action b. of CTS 3.2.1 which requires that with $F_Q(Z)$ out of limits, correct the cause. The licensee has identified this change as administrative. This change appears to be less restrictive and needs adequate technical justification.

- The licensee is proposing to replace required action A.5 of NUREG-1431, TS 3.2.4, with a surveillance requirement. The licensee's justification is that a surveillance requirement is more appropriate. This change either needs additional technical justification or it is a generic issue that should be addressed by a TSTF change to the STS.

- The licensee is proposing to delete the word "one" from "QPTR within limit... with one power range..." in CTS 3.2.4. The licensee claims this is an administrative change. This change is less restrictive and needs adequate technical justification.

Section 3.3

The following proposed changes are beyond the scope of the conversion process:

- Changes revising Mode 5 requirements to incorporate rapid refueling design features.

- Changes to allowable values and setpoints beyond that considered necessary to adapt the STS format.

- Changes incorporating Reactor Trip System (RTS) Response Time Testing without completion of the related topical report evaluation basis and associated conditions for an acceptable change in the design basis.

- Changes to all Staggered Testing Basis surveillance frequencies to accommodate 3 train configuration. The licensee's justification states, "Staggered testing requirements have been deleted. This change is based on studies performed in the industry that shows negligible impact on component reliability." This is a substantial generic issue that is beyond the scope of the conversion.

The following proposed changes do not have adequate technical justification:

- The licensee is proposing to revise CTS Table 3.3-1 Action Statement 9 for the Safety Injection Input function to provide an additional 6 hours to restore the affected function to operable status and an additional 2 hours for placing a train in bypass for testing. This proposed change

requires a plant specific version of the topical report to be reviewed and approved by the staff.

- The licensee is proposing to adopt with changes, the STS applicability note in LCO 3.3.9 to allow the high count rate alarm to be blocked in MODE 3 during reactor startup. This is a change to the current licensing basis for which there is inadequate justification for the staff to properly review the change.

Section 3.4

- A change has been added to the Notes and Required Actions of proposed RCS specifications ITS 3.4.5, 3.4.6, 3.4.7, 3.4.8, 3.9.5, and 3.9.6. In the CTS and NUREG-1431, when applicable, the Notes and Required Actions in the associated specifications prohibit operations that could cause dilution of RCS boron concentration. However, in the proposed specifications it is permissible to add water to the RCS which would dilute the boron concentration. DOC L.27 provides a justification for this that seems reasonable, which is that while the added water may have less boron than the RCS it will still be required to be above the minimum allowed for the RCS. The justification does not address the possible effects of stratification, since uniform boron concentration cannot be assured when there is no forced circulation. The justification also does not address the possible effects on design basis accident analysis. This is a generic change which should be approved through the TSTF process and is beyond the scope of the conversion.

- The licensee is proposing new ITS SR 3.4.1.4 to complete the performance of the precision heat balance within 24 hours of reaching ≥90% reactor thermal power (RTP), which is consistent with NUREG-1431. However, the proposed ITS changes the requirement from 24 hours to 168 hours which requires additional technical justification. In addition, the justification discusses performing the SR with the plant at ≥98% RTP. The 98% appears to be in error.

- The licensee is proposing SR 3.4.6.3 and 3.4.7.2 to verify valve CV0198 position to be pinned or locked to limit flow to ≤125 gpm every 31 days. The STP CTS require verification of valve position every 12 hours. This change needs adequate technical justification to increase the surveillance time from 12 hours to 31 days.

- CTS 3.2.5 Action requires 4 hours for a shutdown to less than 5% reactor power following 2 hours for returning an out of tolerance limit to within tolerance. Therefore, the CTS allows a total time of 6 hours. The proposed ITS 3.4.1.1 revises the time for Action B to 6 hours. This allows a total of 8 hours for the actions to be completed. The technical justification provided is insufficient to demonstrate that this change is within the design basis analysis.

- Proposed ITS SR 3.4.2.1 removes a surveillance requirement for verifying average temperature within 15 minutes prior to reaching criticality. The justification describes that monitoring the temperature difference

using the T_{avg} - T_{ref} alarm is an adequate substitute for monitoring the temperature. The DOC explains that if the alarm is not reset and temperature is greater than 571°F, the temperature is monitored every 30 minutes. The DOC did not discuss not monitoring temperature within the 15 minutes before criticality. The justification should demonstrate that all requirements for monitoring RCS average temperature are addressed.

- Proposed ITS 3.4.6 note 1 adds a requirement that one reactor coolant pump must remain in operation until valve CV0198 has been secured in position to restrict flow to ≤125 gpm. The licensee considers this to be an administrative change. DOC A.10 explains that this note is consistent with NUREG-1431. This change is not consistent with NUREG-1431 because it is not addressed in NUREG-1431, and additional justification is needed to demonstrate that this provision is consistent with the plant design.

Section 3.5

- The licensee has proposed a Note to CTS SR 4.5.3.1.1 to clarify the current practice and interpretation of allowing credit to be taken for portions of an ECCS subsystem as an OPERABLE subsystem although they have been manually aligned to function as part of an RHR system in operation. The licensee states that this is consistent with the allowance to take manual action in MODE 4 to align and actuate an ECCS system, and is consistent with existing plant interpretations and procedures. The licensee also states that this is an editorial change with no effect on the implementation of the TS requirements and is consistent with NUREG-1431.

  This is not an administrative change because this requirement does not exist in the CTS and is stated to come from the licensee's interpretation. This is a technical change and deviation from the NUREG-1431 Note for ITS SR 3.5.3.1. The proposed deletion of the text in the note to ITS SR 3.5.3.1 has not been adequately justified. The basis for this change appears to be the formalization of an operating practice at STP which is not explicitly addressed in the CTS. The additional justification should clearly explain why departure from the STS is warranted.

- A requirement contained in CTS surveillance 4.5.3.1.2 is transformed to a Note for the proposed ITS SR 3.5.3.2 and a Note for the proposed ITS LCO 3.5.3. The Notes provide an allowance, when entering MODE 4 from MODE 3, that more than one HHSI pump breaker may be racked in. This allowance is maintained until any RCS cold leg temperature reaches 325°F. At that temperature, only one HHSI pump breaker may be racked in. The licensee states that insertion of the Notes does not modify the technical requirements of the CTS and the change is considered administrative in nature. The licensee also states that this change is consistent with the philosophy of NUREG-1431.

This is not an administrative change because essential time limitation requirements are deleted. With these notes and without the 4 hour time limit, there exists two operating temperature gaps in MODE 4 where the LCO does not apply. This DOC should be combined with L.9. However, L.9 DOC also does not discuss the technical justification for removing the 4 hour allowance before achieving correct system alignments.

- The licensee is proposing to modify the restrictions on operating with an abnormal ECCS pump alignment following a MODE change into MODE 4 from MODE 5, and delete the 4 hour limit in CTS 3.5.3.1. This change allows abnormal alignments based purely on the temperature of the RCS cold legs. The allowance provides for no HHSI pumps breakers to be racked in from 200°F to 225°F when entering MODE 4 from MODE 5. The proposed ITS LCO still requires 2 OPERABLE HHSI subsystems before entering MODE 4. This change is also reflected in the performance of the conditional surveillance requirements of proposed SR 3.5.3.2. The licensee states that the change is justified based on the STP plant specific Pressure and Temperature limits which provide assurance that the plant can adequately respond to the limiting DBAs for these conditions.

  The DOC for this change (L.9) does not discuss the technical justification for removing the 4 hour allowance before achieving correct system alignments.

- The licensee is proposing to delete the requirement in CTS 3.5.2 action b and CTS 3.5.3.1 action c to provide a Special Report in the event the ECCS is actuated and injects water into the Reactor Coolant System. For the change to CTS 3.5.2, the licensee states (DOC LA.8) that this requirement is adequately captured by the reporting requirements in 10 CFR 50.73 and is implemented in plant procedures. For the change to CTS 3.5.3.1, the licensee states (DOC LA.20 from Section 5.0) that this change moves the requirements in the CTS, which stipulate the destination of required reports (specific agencies or addresses within the NRC) and the date the reports are required to be submitted to plant procedures. The licensee further states that the destination requirements are also in 10 CFR 50.4.

  The Special Reporting action requirements are the same wording for both LCOs, yet there are two different justifications. Why are these technical justifications not consistent? The justification should also clearly state why the applicable regulations and associated procedures provide an adequate basis for removing this reporting requirement, like that typically used in the staff's conversion safety evaluations.

Section 3.6

- The licensee is proposing to move the requirements in CTS 3.6.1.6, pertaining to the tendons and containment inspections, to the Containment Leakage Rate Testing Program in the proposed ITS Programs Section, in Chapter 5.0. The applicable portion of Specification 3.6.1.6 is replaced with a Surveillance Requirement, SR 3.6.1.2, which requires the performance of the Tendon Surveillance Program. The

licensee states that the technical requirements are unchanged, the change is considered administrative and the change is consistent with NUREG-1431.

SR 4.6.1.6 requirements are proposed to be placed in Section 5.5.16, Containment Leakage Rate Testing Program and not in Section 5.5.6, Prestressed Concrete Containment Tendon Surveillance Program. These changes are not consistent with the NUREG-1431. In addition, these proposed changes do not have adequate technical justification.

- The licensee is proposing to incorporate portions of CTS Surveillance 4.6.1.3.a and b into ITS SR 3.6.2.1. This includes the acceptance criteria for air lock leakage tests, as required by the Containment Leakage Rate Test Program and two Notes. The Notes are added to remind the user that: 1) an inoperable door does not invalidate a successful performance of an overall air lock leakage rate test and 2) results of air lock testing will be evaluated for impact on overall containment leakage rate requirements. The remaining portions of the surveillance are addressed by a relocation change later in this section. The licensee states that no technical requirements are modified by these changes, they are considered administrative in nature, and they are consistent with NUREG-1431 and the NRC guidance on the implementation for 10 CFR Part 50, Appendix A, Option B.

  There appears to be no statement in the Bases of the proposed ITS which states that STP has selected to be in accordance with "Option A or B" of Appendix J. This is a series of significant technical changes involving many CTS requirements due to a change in the Rules of Appendix J, but STP has provided no technical justification. These changes are not merely administrative, but appear to be less restrictive. The proposed markup of ITS Bases and ITS 3.6.1 is not consistent with the NUREG-1431 and approved modifications for implementing Option B rules. The staff recently provided comments on a related TSTF change to clarify partial implementation of Option B. In addition, this change appears to implement changes to the airlock requirements that are beyond the scope of the conversion.

- The licensee is proposing to revise CTS SR 4.6.2.1.b and c to include the wording, "required developed head", "in accordance with Inservice Testing Program", and "an actual or simulated actuation signal" to be consistent with NUREG-1431. "On a staggered test basis," is being eliminated so that testing requirements will be conducted as required by the Inservice Testing Program. The licensee states that no technical requirements are modified by these changes and they are considered administrative in nature.

  This is not an administrative change. In 4.6.2.1.b, the staggered test basis has been deleted in favor of the ITS Program. This appears to be a relaxation from the current licensing basis and should be justified as a less restrictive change.

Section 3.7

- In CTS 3.7.1.2, for SR 4.7.1.2.1.a.3 and 4, the licensee is proposing to delete the STAGGERED TEST BASIS. The A.1 DOC provided as justification for this change is inadequate. As identified, this is not an administrative change, but a technical change which is beyond the scope of the coversion as previously described. The L.16 DOC applies to SR 4.7.1.2.a.1 and 2 only.

- In CTS 3.7.1.7, in Action for MODE 3, the licensee is proposing to add a Note for "Separate Condition Entry is allowed for each valve" and this is to apply to one "or more" various inoperable valves. This change is not an administrative change, but a technical change. The licensee has also proposed to add several other valves to this LCO. This is not consistent with NUREG-1431. There is a discussion of what is changed, but there is no technical justification for all these specific changes.

- The licensee is proposing to add a Note to CTS SR 4.7.3.a and c, which allows CCW not to be declared inoperable when CCW flow to most individual components are isolated (DOC A.15). The licensee states that this note is consistent with current plant practices not to declare CCW inoperable when CCW flow to most individual components is isolated; the individual components are declared inoperable. The licensee also states that this change is consistent with NUREG-1431.

  This is not an administrative change. The proposed addition of this note provides an exception to operating requirements and thus is a less restrictive technical change. The note as proposed deviates from the note in NUREG-1431 without specific explanation in DOC, JFD or the Bases; therefore, this change is not consistent with NUREG-1431. This change and the deviation from the NUREG-1431 contain no technical justification.

- The licensee is proposing a change to add the MSIV bypass valves to the MSIV TS, ITS 3.7.2 (DOC A.33). The MSIV bypass valves are being moved from CTS 3.6.3 (Containment Isolation Valves). This allows the MSIV bypass valves to be controlled with the MSIVs in the ITS, which is more appropriate than with the Containment Isolation Valves. The licensee states that this change is consistent with the NUREG-1431 format for the ITS MFIV Technical Specifications (ITS 3.7.3) which includes the bypass valves. Other changes were made as a result of this addition and are discussed appropriately in other discussions.

  The requirements of CTS 3.6.3 are being relocated to LCO 3.7.2. This is not an administrative change but a technical change because MODE 4 is proposed to be deleted from the MODE of Applicability. This is not consistent with the NUREG-1431 format for MSIV requirements. For all these proposed changes, there is no technical justification for the basis other than something similar was done elsewhere. The justification needs to address the dual function of the valves. Even though the valves have associated system requirements is not a sufficient basis to eliminate the containment isolation function.

- In DOC M.9, the licensee is proposing to create a new TS, ITS 3.7.19, including an LCO, Action, and Surveillance Requirement, for the In-containment Storage Area (ICSA) Spent Fuel Assembly Storage. Specific requirements currently located in CTS Section 5.0, Design Features, are being changed in conjunction with the addition of this new Specification. The basic requirements of the ICSA spent fuel assembly storage will be retained in ITS Section 4.0, Design Features. The licensee states that the addition of this specification constitutes a more restrictive change because an LCO, Actions, and a Surveillance are being added, whereas in the CTS, no LCO, Action, or Surveillance Requirement exists. The licensee also states that this change is consistent with NUREG-1431.

  This new LCO was added from the NUREG-1431 guidance document. The licensee is proposing to relocate the TS requirements out of the improved TS to the Technical Requirements Manual (TRM). There is no previous precedent and this is not consistent with NUREG-1431. This DOC discusses where all CTS requirements will be found, but there is no technical justification for the proposed changes. The CTS 5.6.1.8 requirements for the ICSA spent fuel storage area are not retained, but are removed from ITS 4.0. This proposed LCO has been stripped of all specific requirements.

- CTS SRs 4.7.1.2.1.a.1 and 2 are the Operability verifications for the AFW pumps. The current frequency for the motor driven pumps is 31 days on a Staggered Test Basis, which is essentially one motor driven pump tested every 10 days, where each pump is tested monthly. The turbine driven pump is also tested monthly. The licensee is proposing a change to require the pumps to be tested in accordance with the Inservice Testing Program. The Inservice Testing Program requires each pump to be tested quarterly (92 days). Therefore, this change decreases the frequency for each pump from 31 days to 92 days. The licensee states that this change is consistent with ASME Section XI, Subsection IWP-3400 which requires tests to be run nominally every 3 months during normal plant operation and that this change is consistent with NUREG-1431.

  This change is not consistent with NUREG-1431. DOC L.16 only discusses what the CTS requirements are and what is proposed while providing no technical justification for the changes.

- CTS 3.7.3 Actions require an LCO 3.0.3 entry if two CCW trains are inoperable. The licensee is proposing to change ITS 3.7.7 to add an Action which provides 24 hours if two trains are inoperable. This change essentially increases the AOT from 1 hour to 24 hours if two CCW trains are inoperable. The licensee's justification for this change is that STP has three redundant CCW trains. Each CCW train services two Reactor Containment Fan Coolers (RCFCs), an RHR heat exchanger, and an RHR pump. The three trains are also connected to a common header that services other equipment. The 24 hours for two CCW trains to be inoperable is reasonable based on operating experience to perform repairs and the low probability of a DBA occurring during this period.

Also, the CTS AOT for two CCW trains inoperable is more restrictive than the RCFC TS or the RHR TS.

The L.19 DOC justification states all three CCW trains are redundant, but each train does not have full capacity to handle the assumed accident. The design basis is for two trains to be operable for the accident and this is not stated in the DOC, but is presented in the Bases. In this loss of function condition, the technical basis is inadequate because it merely states it is more restrictive than other systems.

- CTS 3.7.14 Actions require a LCO 3.0.3 entry if two ECHW trains are inoperable. The licensee's proposed change will add an Action which provides 24 hours if two trains are inoperable. This change in ITS 3.7.10 essentially increases the AOT from 1 hour to 24 hours if two ECHW trains are inoperable. The licensee's justification for this change is that STP has three redundant ECHW trains and during accident conditions, only one ECHW System is required to perform the cooling function required. The 24 hours for two ECHW trains inoperable is reasonable, based on operating experience to perform repairs and the low probability of a DBA occurring during this period.

  The L.29 DOC justification states all three ECHW trains are redundant, but each train does not have full capacity to handle the heat load from three trains of Safety Injection as assumed in the accident. The design basis is for a minimum of two trains to be operable during the accident and this is not stated in the DOC, but is presented in the Bases. In this loss of function condition, the technical basis is inadequate because it merely states it is "reasonable" while it ignores the related consequences for loss of function.

- The specific requirements of the composition of the fuel handling building (FHB) HVAC is defined in CTS 3.7.8 and 3.9.12. The licensee proposes to move this information to the Bases. The specific requirements of CTS SRs 4.7.8.a and 4.9.12.a (where to initiate the Surveillance, how to maintain proper flow, etc.), are being moved to the bases and plant procedures. The specific requirements of CTS SRs 4.7.8.d.2 and 4.9.12.d.2, the specific path of the air flow, are being moved to plant procedures also.

  It is acceptable to relocate composition of the trains to the Bases per NUREG-1431. It is not acceptable to redefine the associated components in the trains to enhance the minimum train operability requirements. The Bases have added a "less restrictive" technical change which proposes to allow any combination of exhaust fans to achieve train operability. This is not permitted in the CTS and is not discussed in either DOC LA.17 or LA.18. ITS SRs 3.7.12.1, 3.7.12.4, 3.7.13.1, and 3.7.13.4, in the respective ITS 3.7.12 and 3.7.13 have been changed without any specific justification for the deviation presented. STP has presented no technical justification for these unidentified changes.

- The licensee is proposing to move the specific Spent Fuel Pool (SFP) Spent Fuel Assembly Storage Figure (CTS Figure 5.6.7) to the COLR. The COLR is controlled via Section 5.0 and requires a 10 CFR 50.59 to be changed.

  In the new LCO identified as ITS 3.7.19, the requirements for placement of fuel assemblies in the ICSA are no longer with this LCO but are proposed to be placed in the COLR. This is not consistent with NUREG-1431. There is also no technical justification for this change.

Section 3.8

The following proposed changes are beyond the scope of the conversion process:

- LCO 3.8.1 - The licensee has proposed to delete the mode constraint on almost all SRs.

- LCO 3.8.2 - The licensee is proposing to add a note allowing use of water from the RWST or from an isolated RHR loop. This same proposed note appears in all shutdown electrical TS. This note is not in the CTS or NUREG-1431.

- Changes to AOTs justified by the STP Probabilistic Safety Assessment.

- The proposed change to eliminate the current time requirement (14 days) for the alternate onsite AC source during Modes 5 and 6 (current TS 3.8.1.2.b, footnote 1) is not in the improved STS.

The following proposed changes do not contain adequate technical justification:

- SR 4.8.1.2.1.b - The licensee is proposing to change the frequency of performing SR 4.8.1.2.b from 8 hours to 7 days.

- DOC LA.1 - Portions of STP CTS LCO 3.8.1.1.a and b are proposed to be moved to the Bases and to Licensee Controlled Documents. The latter "documents" are not identified in the justification, nor are the controls associated with those "documents" identified. The justification for all relocated requirements needs to clearly identify where requirements will be relocated and what requirement will control future changes (e.g., 10 CFR 50.59). The licensee should provide a summary listing of all the relocated requirements and the applicable change control like that previously included in the staff's conversion safety evaluations.

- DOC M.2 - The justification for the proposed change to CTS 3.8.1.1 Action a is unclear. This may be the reason why the change is identified as being More Restrictive when it actually appears to be Less Restrictive. The CTS requirement to be in MODE 4 in 12 hours is being replaced with a requirement to be in MODE 3 in 6 hours. The CTS and ITS both have an additional requirement to be in MODE 5 within 36 hours, so the change could also be considered Administrative, but not More

Restrictive. The justification does not adequately explain the basis for the change.

- DOC M.2 - This is a subset of the proposed change to CTS 3.8.1.1 above. In the CTS markup, the required action is proposed to be in MODE 3 in 6 hours and MODE 5 in the following 36 hours. This is more time than allowed by the CTS, but the change is considered Administrative. The final version of the ITS has the correct time (MODE 5 in a total of 36 hours), and the change, if properly represented, is Administrative. However, the CTS markup is not consistent with the proposed ITS.

- DOC L.3 - The licensee has proposed an exception to LCO 3.0.4 to allow entry into MODES 4 or 3 with one SDG inoperable. This change appears to be beyond the scope of the conversion. In addition, the licensee has not addressed the obvious conflict that would occur if this was allowed. LCO 3.8.1 (ITS) requires 3 SDGs to be OPERABLE in MODES 1-4. An exception to 3.0.4 would allow entry into MODE 4 with one SDG inoperable, but would immediately invoke Condition B and associated actions.

- DOC M.1 - The licensee is proposing to change CTS 3.8.1.1 Action d.1 by deleting the CTS requirement to verify OPERABILITY of equipment dependent on the OPERABLE SDGs with one SDG inoperable substituting a requirement to invoke the Safety Function Determination Program (SFDP) within 4 hours after discovery of an inoperable component in the trains with the OPERABLE SDGs. This is designated as a More Restrictive Change. However, this change does not appear to be consistent with NUREG-1431 and appears to be less restrictive than the CTS. The justification does not adequately explain the nature of or basis for the change.

- DOC L.1 - The licensee is proposing to change CTS LCO 3.8.1.1 Action b completion time from 8 hours to 24 hours. The justification however, is inadequate because it does not explain why the increase in time is required and why the increase is acceptable in terms of plant safety.

- DOC A.5 - The licensee is proposing to delete that portion of CTS LCO 3.8.1.1 Action c dealing with exceptions to testing the remaining SDGs when one SDG is inoperable. The justification provided (A.5) does not specifically or clearly address the proposed change.

- DOC A.1 - CTS LCO 3.8.1.1 Action d.2 to verify the steam driven auxiliary feed pump is OPERABLE, is required with 1 SDG inoperable. As proposed, the ITS would require this Action only when 2 SDGs are inoperable. The justification for this change, A.1, does not clearly address this proposed change including an explanation of why this is an administrative rather than less restrictive change. The licensee also states that A.1 is consistent with NUREG-1431 but the justification is not sufficiently detailed to understand how.

- DOC A.15 - The STP CTS contain provisions for an alternate onsite AC power source that may be substituted for a SDG for a limited period of

time and under specific conditions. The licensee proposes to change the CTS such that the ITS would allow almost unrestricted use of the alternate, onsite AC source. DOC A.15 does not address this change to unrestricted use. The justification also includes a discussion relating to an alternate Required Action in ITS LCO 3.8.2 that is not included in the CTS markup or the proposed ITS.

- DOC A.22 - STP CTS LCO 3.8.1.2 becomes ITS LCO 3.8.2. The ITS included an Action to declare associated equipment inoperable when an offsite circuit or SDG is inoperable. This Action is not included in the CTS and appears to be a less restrictive Change. The justification for the change (A.22) classifies this as an administrative change. The justification does not provide an adequate explanation of why the change is acceptable.

Section 3.9

- In DOC L.7, CTS 3.9.8.1 and 2 suspend operations involving a reduction in Boron Concentration, as does STS 3.9.5 and 6. The change deviates from the CTS and STS by permitting the addition of water with a boron concentration less than the concentration of the RCS, provided the addition does not result in a reduction below what is required for refueling. The justification is that while the added water may be less than the RCS concentration, it will be verified to be greater than what is required for refueling. This is a generic change which should be approved through the TSTF process, and is beyond the scope of this conversion.

- The licensee is proposing to add an allowance for substituting temporary instrumentation for the required source range monitors by changing the definition of source range monitor in ITS B 3.9.3. The allowance is not included in CTS 3.9.2 or STS 3.9.3. This change is a deviation from NUREG-1431. DOC LA.8 justifies this beyond scope change by stating that the "temporary monitors provide the same indication and alarms as the source range monitors." This beyond scope change is not evident in ITS 3.9.3 because the change in definition of Source Range Monitor, to include both Extended Range Neutron Flux Monitors and Temporary Nuclear Instruments, is only changed in the Bases. This is a change to the STS Bases. DOC LA.8 concludes by stating that "this change is consistent with the philosophy of NUREG-1431," which seems misleading, since it required a NUREG-1431 Bases change and is not apparent in the NUREG-1431 LCO.

- CTS LCO 3.9.4 has an allowance for both doors in a Personnel Airlock (PAL) to be open simultaneously if, among other things, "an individual is available to close the PAL." This allowance does not exist in NUREG-1431, which only permits one door in a PAL to be opened. The proposed ITS relocates to plant procedures the requirement for "an available individual..." by explaining that the "change is consistent with the NUREG-1431 philosophy to remove details to licensee controlled documents." This change is not consistent with NUREG-1431 and lacks adequate technical justification. In addition, this change appears to

be similar to recent license amendments on other plants which would be beyond the scope of this conversion.

- CTS 3.9.2 note allows an Extended Range Monitor to substitute for one Source Range Monitor. Proposed ITS B 3.9.3 increases this allowance to two Extended Range Monitors substituting for both required Source Range Monitors. This is a less restrictive change that is not adequately justified in that it is claimed to be administrative (DOC A3).

- NUREG-1431 and CTS 3.9.1 limit the boron concentration in the filled portions of the RCS and refueling canal. The proposed ITS does not limit the requirement to portions that are filled, but rather to portions that "are connected to the RCS." This change is less restrictive and is an apparent deviation from NUREG-1431. The justification claims to be a clarification and "consistent with NUREG-1431 (JD6)." DOC A7 is a less restrictive change, and not consistent with NUREG-1431.

Section 4.0

- In Section 4.3.1.2, the licensee's CTS markup is inconsistent with the licensee's submittal of revised TS for items a., b., and c. However, the licensee's May 31, 1996, TS submittal is consistent with NUREG-1431. The licensee designated the changes as Administrative Changes.

Section 5.0

- CTS 6.9.1.6 contains requirements for the COLR. Proposed ITS 5.6.5a adds two additional required sections to the report, Shutdown Margin and Refueling Boron Concentration. DOC A.20 does not address the more restrictive nature of this change.

- CTS 6.9.1.6a requires a copy of the COLR in the control room. Proposed ITS 5.6.5a deletes this requirement. DOC LA.32 does not adequately identify why this requirement is no longer necessary.