

May 29, 1997

Mr. Charles H. Cruse  
Vice President - Nuclear Energy  
Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, MD 20657-4702

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE TECHNICAL  
SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE IMPROVED TECHNICAL  
SPECIFICATIONS FOR THE CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS.  
1 AND 2 (TAC NO. M97363 AND M97364)

Dear Mr. Cruse:

On December 4, 1996, Baltimore Gas and Electric Energy (BGE), submitted a license amendment request to convert the Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Current Technical Specifications to the Improved Technical Specifications (ITS). During the course of our review, we found that we require additional information to complete our evaluation. Please respond to the enclosed request for information (RAI) that seeks to clarify the ITS Sections 3.3.1, 3.3.2; and all of 3.4 and 3.6.

In addition, the staff requests a clear description of all Combustion Engineering Owners Group (CEOG) travelers that did not become Technical Specifications Task Force (TSTF) travelers and a status of all the CEOG travelers. To support the NRC staff's review schedule, your written and electronic response in WordPerfect 5.1 to this RAI is requested within 15 days of the receipt of this letter. Should you have any questions, please do not hesitate to contact me at (301) 415-3473.

Sincerely,

Original Signed By

Alexander W. Dromerick, Senior Project Manager  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-317  
and 50-318

Enclosure: RAI

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DOCUMENT NAME: G:\CC-MAY29.RAI

OFFICE	TSB/ADPR	PM: PDI-1	LA: PDI-1	PD: PDI-1
NAME	MLReardon <i>MLR</i>	ADromerick	SLittle <i>SL</i>	<i>QWD</i>
DATE	5/29/97	5/29/97	5/29/97	5/29/97

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Mr. Charles H. Cruse  
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 and 2

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### CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.5		CTS 4.3.1.1.2 requires demonstrating the bypass logic, including the automatic bypass removal logic Operable prior to each reactor startup, unless performed during the preceding 92 days. ITS 3.3.1 moves this requirement to unidentified plant procedures. The justification does not identify the plant procedure that maintains this requirement nor the specific controls that maintain the requirement in plant procedures.	Revise the submittal to specifically identify the plant procedures that contain this requirement and describe how changes to it will be controlled.	5/20/97 open
BGE Response:					
2			CTS 4.3.1.1.2 requires demonstrating the Operability of the total bypass function during Channel Calibrations of each channel affected by bypass operation. ITS SR 3.3.1.7 requires a Channel Functional Test of only the automatic bypass removal function. The total bypass function is not demonstrated Operable by the ITS. This less restrictive change is not justified.	Provide discussion and justification for this less restrictive change that deletes testing of the total bypass function.	5/20/97 open
BGE Response:					
3	LA.2		CTS Table 3.3-1 Notation f, requires at least two decades of overlap between the wide range logarithmic neutron flux monitoring channels and the power range neutron flux monitoring channels. ITS 3.3.1 moves this detail to unidentified plant procedures. DOC LA.2 does not identify the plant procedure that maintains this requirement nor the specific controls that maintain the requirement in plant procedures.	Revise the submittal to specifically identify the plant procedures that contain this requirement and describe how changes to it will be controlled.	5/20/97 open
BGE Response:					

**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	LA.6		<p>CTS Table 3.3-1, Action 2.b, requires, within one hour, placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel. DOC LA.6 states this requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. Although the SFDP is activated under ITS LCO 3.0.6 and ITS LCO 3.0.6 would apply when ITS LCO 3.3.1 is not met, it is not certain that the SFDP would require taking the same action as Action 2.b of CTS Table 3.3-1 or an equivalent action.</p>	<p>Revise the submittal to fully explain how Action 2.b of CTS Table 3.3 1 will be accomplished under the ITS. In addition, this is an L-type, not an LA-type change.</p>	5/20/97 open
BGE Response:					
5	M.1		<p>With one inoperable channel in trip, CTS Table 3.3-1 Action 2.c allows bypassing an additional channel for testing and maintenance for up to 48 hours. Corresponding ITS 3.3.1 Action B allows placing one inoperable channel in trip and a second in bypass without restriction on the second channel; that is, the second channel can be inoperable for testing, maintenance, or for any other reason. This is less restrictive because the ITS allows the second RPS channel to be inoperable for reasons other than permitted by CTS Table 3.3-1 Action 2.c. In addition, in the event a second channel is inoperable for other than routine surveillance testing, the CTS specify no action requirements; thus a plant shutdown would be required by CTS 3.0.3. ITS 3.3.1 Action B permits operation for up to 48 hours before a shutdown (per ITS 3.3.1 Action G) is required. The submittal does not address these relaxations.</p>	<p>Revise the submittal to discuss and justify the relaxations associated with ITS 3.3.1 Action B.</p>	5/20/97 open
BGE Response:					



**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	A.7 L.2		CTS Table 4.3-1, Endnote (3), restricts reactor power to 90% Rated Thermal Power (RTP) if the calibration of the excore channels to the incore detectors is not current; this surveillance specifies no time limit to reduce power - in DOC L.2, BGE apparently interprets it to be immediately. However, because it is not explicit, specifying a time limit is considered to be an additional requirement. Corresponding ITS 3.3.1 Action C requires, within 24 hours, either calibrating the excore channels to the incore detectors (i.e., performing ITS SR 3.3.1.3), or limiting the reactor power to 90% RTP. If either of these actions are not met within 24 hours, ITS 3.3.1 Action G requires shutting the plant down to Mode 3. An explicit time limit of 24 hours and a shutdown requirement are more restrictive than the requirement of CTS Endnote (3). Therefore, the addition of Actions C and G is a more restrictive change.	Revise the submittal to address the requirements of ITS 3.3.1 Action C that are more restrictive than corresponding Notation (3) of CTS Table 4.3-1; specifically discuss the 24-hour Completion Time and the explicit requirement to either calibrate the excore channels or reduce power.	5/20/97 open
BGE Response:					
7	L.1		ITS SR 3.3.1.2 (heat balance) Note 1 allows delaying the surveillance until 12 hours after power is > 15% RTP in agreement with CTS Table 4.3-1 Notations (2) and (4). DOC L.1 discusses > 20% RTP rather than > 15% RTP.	Revise the submittal to address this inconsistency. If the ITS uses > 20% RTP, justify it.	5/20/97 open
BGE Response:					

**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8	A.1 LA.3		CTS Table 4.3-1 requires a Channel Calibration daily and at each refueling interval for Function 2.b, "ΔT Power - High. In addition, Notation (4) to the daily Channel Calibration requires daily adjustments of the "ΔT Power Calibrate" potentiometers when above 15% RTP. ITS Table 3.3.1-1 does not specify a Function for ΔT Power - High (but only Power Level - High), and consequently, appears to omit the CTS adjustments and calibrations. This apparent less restrictive change has no justification.	Provide discussion and justification for this less restrictive change that appears to delete testing of the Power Level - High, ΔT Power Function. See Comment 21.d.	5/20/97 open
<b>BGE Response:</b>					
9	A.9 LA.4		DOC A.9 mistakenly says that the trip setpoints in CTS Table 2.2-1 will be listed in ITS Table 3.3.1-1. But DOC LA.4 clearly says they are moved to unspecified plant procedures - controlled by the "plant change control process," which has not been defined in the submittal.	Revise the submittal to explicitly state the procedures containing the trip setpoints and discuss the regulatory basis of the "plant change control process."	5/20/97 open
<b>BGE Response:</b>					
10	A.14		CTS Table 2.2-1, Function 3, Reactor Coolant Flow - Low, Table Notation *, references CTS 3.2.5, "DNB Parameters," for the design reactor coolant flow. The referral to CTS 3.2.5 for the definition of design flow is deleted from ITS Table 3.3.1-1, Function 3, Reactor Coolant Flow - Low because the ITS does not reference other Specifications. The justification does not state design flow is defined in the ITS and the controls over that definition, nor show that definition is adequate for ITS Table 3.3.1-1, Function 3, Reactor Coolant Flow - Low.	Revise the submittal to address how reactor coolant design flow is defined and controlled for this RPS trip Function.	5/20/97 open

**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
<b>BGE Response:</b>					
11	LA.4		CTS Table 2.2-1 contains "Trip Setpoint" and "Allowable Values" columns. Corresponding ITS Table 3.3.1-1 contains only the "Allowable Values" column. Specific trip setpoints are proposed to be moved to plant procedures. The justification for deleting the trip setpoints from ITS 3.3.1 does not identify the plant procedures. In addition, the proposed control mechanism for the trip setpoints, the "plant change control process," is not described.	Revise the submittal to explicitly state the procedures containing the trip setpoints and discuss the regulatory basis of the "plant change control process." See comment 3.3.1-9.	5/20/97 open
<b>BGE Response:</b>					
12	LA.7		CTS Table 2.2-1 specifies the allowable value for the Thermal Margin/Low Pressure (TM/LP) RPS function as not less than the larger of 1875 psia or the limits provided in the Core Operating Limits Report (COLR). Corresponding Function 9.a of ITS Table 3.3.1-1 omits the 1875 psia limit.	Revise the submittal to clarify if and when the COLR will be revised to include the 1875 psia limit.	5/20/97 open
<b>BGE Response:</b>					
13	M.3		STS 3.3.1 Condition F is for "Required Action and associated Completion Time not met." ITS 3.3.1 Condition G is for "Required Action and associated Completion Time not met except for Axial Power Distribution - High and Loss of Load Trip Functions." The STS deviation exempting the Axial Power Distribution - High and Loss of Load Trip Functions from Condition G is based on TSTF-80. TSTF-80 was rejected by the NRC on 3/14/97.	Revise the submittal as appropriate to reflect withdrawal of changes and differences based on conforming to TSTF-80.	5/20/97 open
<b>BGE Response:</b>					

**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
14	M.3		ITS 3.3.1 adds Condition F for "Required Action and associated Completion Time not met for Axial Power Distribution - High and Loss of Load Trip Functions." The STS deviation adding this condition and Required Action, "Reduce THERMAL POWER to < 15% RTP" within a completion time of 6 hours is based on TSTF-80. TSTF-80 was rejected by the NRC on 3/14/97.	Revise the submittal as appropriate to reflect withdrawal of changes and differences based on conforming to TSTF-80.	5/20/97 open
<b>BGE Response:</b>					
15	A.1		<p>The Note to ITS SR 3.3.1.5 and ITS SR 3.3.1.8 retains the allowance of CTS Table 4.3-1 Notation (5) to exclude neutron detectors from Channel Calibration (CTS 4.3.1.1.1), (affecting ITS 3.3.1 RPS Functions 1, 2, 8, and 9.a). This allowance is not contained in corresponding STS SR 3.3.1.8, the refueling interval Channel Calibration for these RPS Functions. These exclusions are based on TSTF-81, which is pending. However, approval of this STS deviation is not contingent on NRC approval of TSTF-81 because it appears consistent with the CTS.</p> <p>In addition, the Note to ITS SR 3.3.1.8 also excludes the loss of load function from Channel Calibration; this change to the CTS is not addressed. Further, ITS Table 3.3.1-1 Function 10, "Loss of Load," does not list ITS SR 3.3.1.8 as a required SR.</p>	Revise the submittal to justify the Note excluding the loss of load function from a refueling-interval Channel Calibration in ITS SR 3.3.1.8, and explain why ITS SR 3.3.1.8 is not specified for RPS Function 10 in ITS Table 3.3.1-1.	5/20/97 open
<b>BGE Response:</b>					
16	A.1		ITS Table 3.3.1-1 contains an applicable Modes column; STS Table 3.3.1-1 does not have this column. Inclusion of a Modes column is based on TSTF-85. TSTF-85 was rejected by the NRC on 3/14/97.	Revise the submittal with a plant-specific justification for this deviation from the STS.	5/20/97 open
<b>BGE Response:</b>					



**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
17		5	ITS 3.3.1 does not contain figures corresponding to STS Figures 3.3.1-1, STS 3.3.1-2, and 3.3.1-3. In place of referencing these figures for the allowable values for Functions 8 and 9a of STS Table 3.3.3-1,, the ITS references the COLR. These STS deviations are based on TSTF-80 and the allowable values being controlled by the COLR. TSTF-80 was rejected by the NRC on 3/14/97. However, CTS Table 2.2-1 specifies the allowable values for Functions 8 and 9.a by referencing the COLR; therefore, the ITS is consistent with the CTS. Approval of this STS deviation is not contingent on NRC approval of TSTF-80 because the ITS is consistent with the CTS.	Revise the submittal as appropriate to reflect withdrawal of changes and differences based on conforming to TSTF-80 not associated with conforming to the CTS requirements.	5/20/97 open
BGE Response:					
18	A.16		<p>ITS Table 3.3.3-1 Note (e) for RPS Functions 8 and 10 (axial power distribution - high, and loss of load), states these trips are only applicable in Mode 1 when <math>\geq 15\%</math> RTP; DOC A.16 claims CTS (Table 2.2-1 Note (3) (?)) allow these RPS functions to be bypassed when Thermal Power is less than 15% RTP. Thus ITS Note (e) and the CTS Applicability for these RPS functions are equivalent. However, the specific CTS reference containing this bypass/applicability allowance is not clearly indicated on the CTS markup and does not appear to be specified in the CTS for these two RPS functions.</p> <p>In addition, the STS does not contain this bypass allowance for the axial power distribution - high and loss of load RPS functions which is the subject of TSTF-80. TSTF-80 was rejected on 3/14/97.</p>	Revise the submittal to (1) justify this plant-specific deviation from the STS and relaxation of the CTS, and (2) reflect withdrawal of changes and deviations based on conforming to TSTF-80.	5/20/97 open
BGE Response:					

**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
19	LA.3		CTS Table 4.3-1 Notations (2) and (4) specifically require adjusting the Nuclear Power Calibrate Potentiometers and the $\Delta T$ Power Calibrate Potentiometers, respectively. These details are moved to plant procedures. DOC LA.3 does not identify the plant procedures that maintain these details. In addition, the proposed control mechanism for these details the "plant change control process," is not described.	Revise the submittal to explicitly state the procedures containing the these procedural details and discuss the regulatory basis of the "plant change control process." See comments 3.3.1-9 and 3.3.1-11.	5/20/97 open
BGE Response:					
20	LA.6		CTS Table 3.3-1 Action 2.b requires placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable channel within one hour. ITS 3.3.1 does not require this action. This requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. DOC LA.6 states that changes to the SFDP are in accordance with the plant change control process. The plant change control process is not described.	Revise the submittal to describe the regulatory basis of the plant change control process, and identify the plant procedures that maintain control over the plant change control process and controls over changes to the SFDP.	5/20/97 open
BGE Response:					

**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
21a			<p>ITS 3.3.1, Table 3.3.1-1, Function 1, Power Level - High  ITS SR 3.3.1.7 Channel Functional Test (CFT) - automatic bypass removal feature  CTS 3.3.1.1, Table 3.3-1, Functional Unit 2, Power Level - High  CTS 4.3.1.1.2 test of total bypass function during Channel Calibration  CTS 3.3.1.1, Table 4.3-1, Functional Unit 2.a, Nuclear Power Level - High</p> <p>CTS 4.3.1.1.2 appears to apply to the power level - high functional unit, but corresponding ITS SR 3.3.1.7 is not specified for this function on ITS Table 3.3.1-1. The submittal contains no explanation of this.</p>	Revise the submittal with an explanation.	5/20/97 open
<b>BGE Response:</b>					
21b			<p>CTS Table 4.3-1 specifies that the surveillances for the <math>\Delta T</math> power level - high functional unit are required to be met in Mode 1 only. ITS Table 3.3.1-1 specifies that the surveillance (and operability) requirements for this function apply in Mode 2 also. The submittal contains no explanation of this.</p>	Revise the submittal with an explanation.	5/20/97 open
<b>BGE Response:</b>					
21c			<p>CTS 4.3.1.1.2, test of total bypass function during Channel Calibration, is retained as ITS SR 3.3.1.7 Channel Functional Test (CFT) of the automatic bypass removal feature. The submittal contains no explanation of the equivalence of these two test requirements.</p>	Revise the submittal with an explanation.	5/20/97 open
<b>BGE Response:</b>					

**CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING**

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
21d			<p>ITS 3.3.1, Table 3.3.1-1, Function 1, Power Level - High  CTS 3.3.1.1, Table 4.3-1, Functional Unit 2.b, <math>\Delta T</math> Power Level - High</p> <p>The <math>\Delta T</math> power level - high function is not discussed in the Bases for ITS 3.3.1.</p>	Revise the submittal with an explanation.	5/20/97 open
<b>BGE Response:</b>					
22			<p>ITS 3.3.1, Table 3.3.1-1,  Function 4, Pressurizer Pressure - High  Function 5, Containment Pressure - High  Function 7, Steam Generator Level - Low  Function 9.b, Asymmetric Steam Generator Transient</p> <p>ITS SR 3.3.1.7 Channel Functional Test (CFT) - automatic bypass removal feature</p> <p>CTS 3.3.1.1, Table 3.3-1,  Functional Unit 4, Pressurizer Pressure - High  Functional Unit 5, Containment Pressure - High  Functional Unit 7, Steam Generator Water Level- Low  Functional Unit 9.b, Steam Generator Pressure Difference - High</p> <p>CTS 4.3.1.1.2 test of total bypass function during Channel Calibration</p> <p>CTS 4.3.1.1.2 appears to apply to the pressurizer pressure - high, containment pressure - high, steam generator water level - low, and steam generator pressure difference - high functional units, but corresponding ITS SR 3.3.1.7 is not specified for these functions on ITS Table 3.3.1-1. The submittal contains no explanation of this.</p>	Revise the submittal with an explanation. (Note: This comment is repeated for the power level - high functional unit in comment 28.a.)	5/20/97 open



CCNPP ITS 3.3.1 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - OPERATING

3.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response:					

**CCNPP ITS 3.3.2 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - SHUTDOWN**

3.3.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	M.1		<p>With one inoperable channel in trip, CTS Table 3.3-1 Action 2.c allows bypassing an additional channel for testing and maintenance for up to 48 hours. Corresponding ITS 3.3.2 Action B allows placing one inoperable channel in trip and a second in bypass without restriction on the second channel; that is, the second channel can be inoperable for testing, maintenance, or for any other reason. This is less restrictive because the ITS allows the second RPS channel to be inoperable for reasons other than permitted by CTS Table 3.3-1 Action 2.c. In addition, in the event a second channel is inoperable for other than routine surveillance testing, the CTS specify no action requirements; thus a plant shutdown would be required by CTS 3.0.3. ITS 3.3.1 Action B permits operation for up to 48 hours before a shutdown (per ITS 3.3.2 Action E) is required. The submittal does not address these relaxations.</p>	<p>Revise the submittal to discuss and justify the relaxations associated with ITS 3.3.2 Action B.</p> <p>See comment 3.3.1-05</p>	5/28/97 open
<b>BGE Response:</b>					
2	LA.1		<p>CTS 4.3.1.1.2 requires demonstrating the bypass logic, including the automatic bypass removal logic Operable prior to each reactor startup, unless performed during the preceding 92 days. ITS 3.3.2 moves this requirement to unidentified plant procedures. The justification does not identify the plant procedure that maintains this requirement nor the specific controls that maintain the requirement in plant procedures.</p>	<p>Revise the submittal to specifically identify the plant procedures that contain this requirement and describe how changes to it will be controlled.</p> <p>See comment 3.3.1-01</p>	5/28/97 open

**CCNPP ITS 3.3.2 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - SHUTDOWN**

3.3.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
<b>BGE Response:</b>					
3	LA.3		<p>CTS Table 3.3-1, Action 2.b, requires, within one hour, placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel. DOC LA.6 states this requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. Although the SFDP is activated under ITS LCO 3.0.6 and ITS LCO 3.0.6 would apply when ITS LCO 3.3.2 is not met, it is not certain that the SFDP would require taking the same action as Action 2.b of CTS Table 3.3-1 or an equivalent action.</p>	<p>Revise the submittal to fully explain how Action 2.b of CTS Table 3.3-1 will be accomplished under the ITS. In addition, this is an L-type, not an LA-type change.</p> <p>See comment 3.3.1-04</p>	5/28/97 open
<b>BGE Response:</b>					
4			<p>CTS Table 2.2-1 specifies an Allowable Value for the power rate of change - high channels of <math>\leq 2.6</math> decades per minute. A CTS markup of this requirement is not included in the submittal for ITS 3.3.2. In addition, ITS 3.3.2 differs from STS 3.3.2 by stating the allowable value in ITS SR 3.3.2.4, not in LCO 3.3.2 as in the STS. This difference is based on TSTF-82, which has not yet been approved by the NRC.</p>	<p>Revise the submittal with a suitable markup of CTS Table 2.2-1 Functional Unit 11 in the CTS markup for ITS 3.3.2, and also with a suitable DOC. Acceptance of specifying the allowable value in ITS SR 3.3.2.4 is contingent on NRC approval of TSTF-82.</p>	5/28/97 open
<b>BGE Response:</b>					

**CCNPP ITS 3.3.2 REACTOR PROTECTIVE SYSTEM (RPS) INSTRUMENTATION - SHUTDOWN**

3.3.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	A.1		<p>CTS 4.3.1.1.2, test of total bypass function during Channel Calibration, is retained as ITS SR 3.3.2.3 Channel Functional Test (CFT) of the automatic bypass removal feature for the power rate of change - high function. The submittal contains no explanation of the equivalence of these two test requirements.</p> <p>In addition, STS LCO 3.3.2 does not specifically include automatic bypass removal feature for the power rate of change - high channels, but ITS LCO 3.3.2 does. This difference is based on TSTF-180 (CEOG-91) which has not yet been approved by the NRC.</p>	<p>Revise the submittal with an explanation.</p> <p>See comment 3.3.1-21c</p> <p>Acceptance of this difference contingent on NRC approval of CEOG-91.</p>	5/28/97 open
BGE Response:					



# CCNPP ITS 3.4.1 RCS PRESSURE, TEMPERATURE, AND FLOW DNB LIMITS

3.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3.4.1-1	L.1	JFD.1	<p>CTS 3.2.5 ACTION requires THERMAL POWER reduction to <math>&lt; 5\%</math> of RATED THERMAL POWER (RTP) if cold leg temperature cannot be restored to <math>\leq 548^{\circ}\text{F}</math> within two hours.</p> <p>Under the same condition, ITS 3.4.1 ACTION D only requires THERMAL POWER reduction to <math>\leq 30\%</math> RTP.</p> <p>STS 3.4.1 ACTION D includes the <math>30\%</math> of RTP value as a bracketed figure, indicating that a plant-specific value may be used in lieu of the STS value. However, the change from <math>5\%</math> to <math>30\%</math> of RTP is not consistent with the STS because the plant-specific value in CTS 3.5.2 ACTION is <math>5\%</math>, not <math>30\%</math>.</p>	<p>Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.</p> <p>Provide additional discussion and justification demonstrating that power reduction to <math>\leq 30\%</math> RTP, versus the CTS value of <math>\leq 5\%</math> RTP, is acceptable based on plant specific analyses.</p>	

### CCNPP ITS 3.4.1 RCS PRESSURE, TEMPERATURE, AND FLOW DNB LIMITS

3.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			<p>Furthermore, the acceptability of this change is justified merely by stating that the potential for violating the DNBR limit is very remote when operating at <math>\leq 30\%</math> RTP while cold leg temperature is not within limits. The No Significant Hazards Consideration (NSHC) also states that reducing power to <math>\leq 30\%</math> RTP ensures the potential for a DNB anomaly is remote. The NSHC further states that operating in accordance with this change results in meeting the DNBR criterion in the event of a DNB limited transient, and that operation in this manner ensures that a DNB limit will not be violated. No specific quantifiable information is provided or referenced, however.</p>		
CCNPP Response:					

**CCNPP ITS 3.4.1 RCS PRESSURE, TEMPERATURE, AND FLOW DNB LIMITS**

3.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3.4.1-2	L.3	JFD.1	<p>Performance of CTS Surveillance Requirement 4.2.5.2 is required at least once per 18 months.</p> <p>In ITS SR 3.4.1.4, this Frequency is extended to 24 months.</p> <p>STS SR 3.4.1.4 specifies an 18-month Frequency for this surveillance. The 18-month Frequency is a bracketed figure in the STS, indicating that a plant-specific value may be used in lieu of the STS value. The change from 18 months to 24 months is not consistent with the STS, however, because the plant-specific value in CTS Surveillance Requirement 4.2.5.2 is 18 months, not 24 months.</p> <p>This change represents not only a relaxed CTS requirement, but also a deviation from the STS.</p>	<u>BEYOND SCOPE</u>	
CCNPP Response:					

**CCNPP ITS 3.4.1 RCS PRESSURE, TEMPERATURE, AND FLOW DNB LIMITS**

3.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3.4.1-3	L.2		<p>CTS Surveillance Requirement 4.2.5.2 requires determining the Reactor Coolant System (RCS) total flow rate to be within its limit by measurement.</p> <p>Discussion of change (DOC) L.2 states a note is added in ITS SR 3.4.1.4 which allows not performing this surveillance until 24 hours after reaching <math>\geq 90\%</math> RTP. The DOC goes on to say this change is required to ensure the test results are representative of RCS total flow, because the test results are more accurate when obtained at power levels <math>&gt; 90\%</math> RTP.</p> <p>ITS SR 3.4.1.4 requires verifying measured RCS total flow rate is within limits. There is no note in ITS SR 3.4.1.4 to allow deferring this surveillance until 24 hours after reaching <math>\geq 90\%</math> RTP. Therefore, in this regard, there is no difference between CTS Surveillance Requirement 4.2.5.2 and ITS SR 3.4.1.4.</p>	Correct or delete the L.2 DOC, and correct the CTS markup and/or the ITS accordingly.	
CCNPP Response:					



### CCNPP ITS 3.4.1 RCS PRESSURE, TEMPERATURE, AND FLOW DNB LIMITS

3.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3.4.1-4	A.2		<p>Most of the requirements contained in CTS 3/4.2.5, DNB Parameters, are placed in ITS 3.4.1, RCS Pressure, Temperature, and Flow DNB Limits.</p> <p>However, CTS 3.2.5.d, requiring AXIAL SHAPE INDEX (ASI) and THERMAL POWER within specified limits, and its associated ACTION and Surveillance Requirements, are not placed in ITS 3.4.1, but are retained as ITS 3.2.5, Axial Shape Index.</p> <p>Accordingly, any changes to these ASI requirements are addressed in the Discussion of Changes (DOCs) for ITS 3.2.5.</p> <p>Since these requirements <i>are</i> retained, but are merely not placed in ITS 3.4.1, the CTS Markup should be annotated as such, rather than indicating the requirement is deleted, and then classifying this change as Administrative.</p>	<p>Correct the CTS Markup pages for ITS 3.4.1 to indicate that CTS 3.2.5.d and its associated ACTION and Surveillance Requirement are discussed in the conversion submittal DOCs for ITS 3.2.5, rather than being deleted as an Administrative Change.</p>	
CCNPP Response:					

# CCNPP ITS 3.4.1 RCS PRESSURE, TEMPERATURE, AND FLOW DNB LIMITS

3.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3.4.1-5		JFD.1	<p>STS 3.4.1.a and STS 3.4.1.b impose requirements on the value of pressurizer pressure and RCS cold leg temperature, respectively. Each of these parameters' required values is stipulated as a range of acceptable values, the lower limit designated with a <math>\geq</math> sign, and the upper limit designated with a <math>\leq</math> sign.</p> <p>ITS 3.4.1.a and ITS 3.4.1.b do not include both upper and lower limits for these parametric requirements. Instead, ITS 3.4.1.a requires pressurizer pressure <math>\geq</math> 2200 psia, and ITS 3.4.1.b requires RCS cold leg temperature <math>\leq</math> 548°F.</p> <p>Likewise, while STS SR 3.4.1.1 and STS SR 3.4.1.2 respectively require verification that pressurizer pressure and RCS cold leg temperature are within the specified upper and lower limits, ITS SR 3.4.1.1 requires verification of pressurizer pressure <math>\geq</math> 2200 psia, and ITS SR 3.4.1.2 requires verification of RCS cold leg temperature <math>\leq</math> 548 F.</p> <p>Beyond incorporation of plant-specific numbers into the brackets, there is no discussion of the reason(s) for not adopting the STS format and content.</p>	<p>Provide discussion and justification for not incorporating the STS format and content with regard to the requirement for a specified range of acceptable values for pressurizer pressure and RCS cold leg temperature.</p> <p>Base the justification on current licensing basis, system design, or operational constraints.</p>	
CCNPP Response:					

### CCNPP ITS 3.4.1 RCS PRESSURE, TEMPERATURE, AND FLOW DNB LIMITS

3.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3.4.1-6		JFD.1	<p>STS 3.4.1.b imposes requirements on the value of RCS cold leg temperature, with a specified allowable band for &lt; [70]% RTP, and a different specified allowable band for <math>\geq</math> [70]% RTP. Likewise, STS SR 3.4.1.2 requires verification that RCS cold leg temperature is within its specified range for operation at either &lt; [70]% RTP, or <math>\geq</math> [70]% RTP, as applicable.</p> <p>ITS 3.4.1.b and ITS SR 3.4.1.2 merely state the required value for RCS cold leg temperature as <math>\leq</math> 548°F, regardless of reactor power level.</p> <p>Beyond incorporation of plant-specific numbers into the brackets, there is no discussion of the reason(s) for not adopting the STS format and content.</p>	Provide discussion and justification for not incorporating the STS format and content with regard to including two separate bands of acceptable values for RCS cold leg temperature, depending on reactor power level. Base the justification on current licensing basis, system design, or operational constraints.	
CCNPP Response:					
3.4.1-7			<p>STS SR 3.4.1.4 requires RCS total flow rate verified by performing a precision heat balance (a calorimetric calculation).</p> <p>ITS SR 3.4.1.4 stipulates this verification by measuring the RCS total flow rate.</p> <p>This STS deviation is based on TSTF-105.</p>	Acceptance of this change is contingent on NRC approval of TSTF-105.	
CCNPP Response:					

### CCNPP ITS 3.4.2 RCS MINIMUM TEMPERATURE FOR CRITICALITY

3.4.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.3		<p>CTS Surveillance Requirement 4.1.1.5.b includes a stipulation that the surveillance is required when the RCS <math>T_{avg}</math> is <math>&lt; 525^{\circ}\text{F}</math>.</p> <p>ITS SR 3.4.2.1 changes this stipulation by specifying <math>T_{avg} &lt; 525^{\circ}\text{F}</math> in any RCS loop.</p> <p>This change constitutes a more restrictive change rather than an administrative change. In addition, this change constitutes an STS deviation, the basis for which is CEOG-113.</p>	<p>Provide discussion and justification for the more restrictive change, including why it is preferable and acceptable to require performance of the required surveillance whenever <i>any one RCS loop's</i> <math>T_{avg}</math> is <math>&lt; 525^{\circ}\text{F}</math>, rather than when the RCS <math>T_{avg}</math> of unspecified loop(s) is <math>&lt; 525^{\circ}\text{F}</math></p> <p>Contingent upon CEOG-113. Has this been rejected. What is the TSTF number.</p>	
CCNPP Response:					
3	M.1		<p>ITS SR 3.4.2.2 is added, requiring RCS <math>T_{avg}</math> in each loop verified <math>\geq 515^{\circ}\text{F}</math> once per 12 hours when <math>T_{avg}</math> in any RCS loop is <math>\geq 525^{\circ}\text{F}</math>.</p> <p>This requirement is not included in CTS 3.1.1.5.</p> <p>This change from the CTS requirements is based on CEOG-113.</p>	<p>Contingent upon CEOG-113. Has this been rejected. What is the TSTF number.</p>	
CCNPP Response:					

# CCNPP ITS 3.4.2 RCS MINIMUM TEMPERATURE FOR CRITICALITY

3.4.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4			<p>STS 3.4.2 Applicability is MODE 1 with <math>T_{avg}</math> in one or more RCS loops <math>&lt; [525]^{\circ}F</math>, and MODE 2 with <math>T_{avg}</math> in one or more RCS loops <math>&lt; [535]^{\circ}F</math> and <math>K_{eff} \geq 1.0</math>.</p> <p>ITS 3.4.2 Applicability is merely MODE 1, and MODE 2 with <math>K_{eff} \geq 1.0</math>.</p> <p>The discussion and justification for this STS deviation is contained in CEOG-113.</p>	Contingent upon CEOG-113. Has this been rejected. What is the TSTF number.	
CCNPP Response:					

### CCNPP ITS 3.4.3 RCS PRESSURE AND TEMPERATURE (P/T) LIMITS

3.4.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.1	JFD.2	<p>CTS 3.4.9.1 requires maintaining RCS temperature and pressure within the limits indicated on Figures 3.4.9-1 and 3.4.9-2.</p> <p>These curves, CTS Figures 3.4.9-1 and 3.4.9-2, are included on two pages in ITS 3.4.3, as Figures 3.4.3-1 and 3.4.3-2. However, the wording of ITS 3.4.3 includes no direction to maintain RCS temperature and pressure according to the limits on these curves, nor does ITS 3.4.3 provide reference to another document wherein specific limits may be obtained. ITS 3.4.3 merely requires RCS temperature and pressure "... maintained within limits."</p> <p>STS 3.4.3 requires maintaining RCS temperature and pressure within the limits specified in the PTLR but, again, ITS 3.4.3 neither states nor references the specific required limits.</p>	Add information showing where limits are specified. As in ...maintained within the limits shown in Figures_ and _.	
CCNPP Response:					
2	A.1		<p>The Applicability of CTS 3.4.9.1 is stated as, "At all times," but, within the text of CTS 3.4.9.1, this Applicability is further modified to, "... during heatup, cooldown, criticality, and inservice leak and hydrostatic testing ..."</p>	Add reference to criticality, and inservice leak and hydrostatic testing in ITS 3.4.3. or provide justification why it should not be added. STS references PTLR which has this. Since you are not using PTLR, include all parameters in the LCO.	
CCNPP Response:					



CCNPP ITS 3.4.4 RCS LOOPS - MODES 1 AND 2

3.4.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
No comments for 3.4.4					

### CCNPP ITS 3.4.5 RCS LOOPS - MODE 3

3.4.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Bases			TSTF 177 (CEOG 83) pending	Changes dependent upon completion of review of TSTF.	
CCNPP Response:					
1	LA.1		The details of CTS 3.4.1.2.a.1 and 3.4.1.2.a.2, specifying precisely which two RCS loops shall be OPERABLE, and how many reactor coolant pumps in each of these two RCS loops must be OPERABLE, are moved to plant procedures.	Provide plant procedure(s) change control process. (50.59?)	
CCNPP Response:					
2	A.1		<p>CTS 3.4.1.2 Applicability is modified by footnote ** which states that a reactor coolant pump shall not be started with the RCS temperature <math>\leq 365^{\circ}\text{F}</math> (Unit 1), <math>\leq 301^{\circ}\text{F}</math> (Unit 2).</p> <p>In ITS 3.4.5 NOTE 2, the term "RCS temperature" is changed to "RCS cold leg temperature." There is no discussion or justification for this change.</p> <p>Specifying which RCS temperature is applicable in meeting the limit enhances the Technical Specifications by removing ambiguity which exists in CTS 3.4.1.2 footnote **. The enhancement constitutes an additional restriction not found in CTS 3.4.1.2; therefore, this is a more restrictive change.</p>	Provide discussion and justification for the more restrictive change, including, as applicable, how CTS 3.4.1.2 footnote ** is interpreted by plant operators, why it is advantageous to use cold leg temperature over other temperature sensor(s), how this enhancement improves plant safety, etc.	
CCNPP Response:					

# CCNPP ITS 3.4.5 RCS LOOPS - MODE 3

3.4.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3			<p>STS 3.4.5 NOTE b includes a criterion that core outlet temperature is maintained at least 10°F below saturation temperature.</p> <p>Likewise, CTS 3.4.1.2.b footnote * states that core outlet temperature is maintained at least 10°F below saturation temperature.</p> <p>However, ITS 3.4.5 NOTE 1.b changes the phrase, "... at least 10°F ..." to "... <math>\geq</math> 10°F ..."</p> <p>Placing the symbol meaning "greater than or equal to" and its associated numeric value directly adjacent to the word "below" causes the reader's mind to stumble. The intended meaning is more quickly grasped by using the phrase "at least 10°F below ..."</p> <p>The reason for this STS deviation is not clear, but it is justified by a handwritten comment in the STS 3.4.5 margin which states, "editorial generic."</p>	Provide justification for the "generic editorial". Was this a TSTF?	
CCNPP Response:					

# CCNPP ITS 3.4.6 RCS LOOPS - MODE 4

3.4.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		The details of CTS 3.4.1.3.a.1, .2, .3, and .4, specifying precisely which two cooling loops of the four RCS and SDC loops possible shall be OPERABLE, and how many RCPs in any defined OPERABLE RCS loop(s) must be OPERABLE, are moved to plant procedures.	Provide information describing the plant procedure(s) to which the details of CTS 3.4.1.3.a.1, .2, .3, and .4 are moved, and how the plant procedures are controlled.	
CCNPP Response:					

# CCNPP ITS 3.4.6 RCS LOOPS - MODE 4

3.4.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2			<p>STS 3.4.6 NOTE b includes a criterion that core outlet temperature is maintained at least 10°F below saturation temperature.</p> <p>Likewise, CTS 3.4.1.3.b footnote "" states that core outlet temperature is maintained at least 10°F below saturation temperature.</p> <p>However, ITS 3.4.6 NOTE 1.b changes the phrase, "... at least 10°F ..." to "... <math>\geq</math> 10°F ..."</p> <p>Placing the symbol meaning "greater than or equal to" and its associated numeric value directly adjacent to the word "below" can cause the reader to stumble. The intended meaning is more quickly grasped by using the grammatically correct phrase "... at least 10°F below ..."</p> <p>The reason for this STS deviation is not clear, but it is justified by a handwritten comment in the STS 3.4.6 margin which states, "editorial generic."</p>	Same as before.	
CCNPP Response:					



### CCNPP ITS 3.4.6 RCS LOOPS - MODE 4

3.4.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.6		<p>Footnote * associated with CTS 3.4.1.3.a.3 and 3.4.1.3.a.4, allows the normal or emergency power source INOPERABLE for the SDC loops in MODE 5. ITS 3.4.6 does not include this allowance.</p> <p>It is presumed that the handwritten "A.5" discussion of change (DOC) designator in the CTS markup for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 is in error, and was intended to be written "A.6." It is on the basis of this presumption that review of the A.6 change is performed.</p> <p>If this presumption is incorrect, then the conclusion reached during the review of change A.6 must be re-addressed.</p>	Correct or verify the "A.5" DOC designator in the CTS markup for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4.	
CCNPP Response:					



# CCNPP ITS 3.4.6 RCS LOOPS - MODE 4

3.4.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	A.5		<p>CTS 3.4.1.3 Applicability footnote * references CTS Special Test Exception (STE) 3.10.5. ITS 3.4.6 deletes the reference to STE 3.10.5.</p> <p>It is presumed that in the CTS markup, the handwritten lines extending from the "A.5" DOC designator to the footnote * designator for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 are in error, and were actually intended to extend to the footnote * designator for CTS 3.4.1.3 Applicability MODE 4.</p> <p>It is on the basis of this presumption that review of the A.5 change is performed.</p> <p>If this presumption is incorrect, then the conclusion reached during the review of change A.5 must be re-addressed.</p>	In the CTS markup, correct or verify the handwritten lines extending from the "A.5" designator to the footnote * designator for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4.	
CCNPP Response:					

# CCNPP ITS 3.4.6 RCS LOOPS - MODE 4

3.4.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	M.3		<p>CTS 3.4.1.3 ACTION b prescribes operator actions in the event that no coolant loop is in operation. ITS 3.4.6 ACTION C includes the equivalent Condition of no RCS or SDC loops in operation, but also adds the Condition of required RCS or SDC loops INOPERABLE; the two described Conditions are linked by an OR statement.</p> <p>The justification focuses on changing the one-hour completion time of CTS 3.4.1.3 ACTION b to a completion time of immediately in ITS 3.4.6 ACTION C, but does not address the further enhancement of adding the Condition of required RCS or SDC loops INOPERABLE. While reasoning for this enhancement may be intuitively obvious, the change must be discussed and justified in the license amendment submittal.</p>	Provide discussion and justification for the more restrictive change of adding the Condition of required RCS or SDC loops INOPERABLE to ITS 3.4.6 ACTION C.	
CCNPP Response:					

### CCNPP ITS 3.4.7 RCS LOOPS - MODE 5, LOOPS FILLED

3.4.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1		<p>If credit is taken for RCS loop(s) OPERABLE for decay heat removal, then CTS 3.4.1.3.a.1 and 3.4.1.3.a.2 stipulate at least one associated RCP OPERABLE in the OPERABLE loop(s).</p> <p>In ITS 3.4.7, RCP OPERABILITY is not a requirement, if credit is taken for the RCS loops as the backup decay heat removal method.</p> <p>The justification states that acceptability of this change is based on:</p> <ul style="list-style-type: none"> <li>- The large contained volume of secondary side water providing a heat sink for the RCS, and</li> <li>- Forced RCS flow not necessary because natural circulation is sufficient to remove the small decay heat load generated by the reactor core until at least one SDC loop is made OPERABLE and/or placed in operation.</li> </ul> <p>There is no specific information provided or described upon which to measure acceptability of the change.</p>	<p>Provide additional discussion and justification for the changed CTS requirement to quantifiably demonstrate adequacy of the SGs' combined heat sink capability, with both SG secondary side water levels at -50 inches, and without forced RCS flow. Development of this justification should include analysis or verification, using the most conservative case (full power history and minimum time to get to MODE 5), of heat transfer rates. The following items should be addressed, as applicable:</p> <ul style="list-style-type: none"> <li>- Maximum core decay heat generation rate,</li> <li>- Total primary to secondary heat transfer area,</li> <li>- Heat transfer coefficient(s),</li> <li>- Relative applicable primary and secondary temperatures,</li> <li>- Total natural circulation flow rate,</li> <li>- Combined SGs' ambient heat loss rate.</li> </ul>	
CCNPP Response:					

### CCNPP ITS 3.4.7 RCS LOOPS - MODE 5, LOOPS FILLED

3.4.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	L.2		<p>The requirements of CTS 3.4.1.3 stipulate both RCS loops in operation if both SDC loops are removed from operation while in MODE 5.</p> <p>ITS 3.4.7 NOTE 4 allows removing both SDC loops from operation during planned heatup from MODE 5 to MODE 4 when at least one RCS loop is in operation. This effectively reduces the CTS 3.4.1.3 requirement from both RCS loops to only one RCS loop in operation.</p>	<p>Provide additional discussion for the less restrictive change based on plant operations. Address factors relating to backup (standby) cooling capabilities of the SDC and RCS loops not in operation; the ability to restore one or both required SDC loops to operation if the decision to achieve MODE 4 is reversed; the intended heatup path obviating the need for the same level of required decay heat removal capability as when no heatup is intended; and so forth, as appropriate.</p>	
<b>CCNPP Response:</b>					
3	L.2		<p>The CTS 3.4.7 markup includes an insert for placement as ITS 3.4.7 NOTE 2, which allows removing one required SDC loop from operation for up to 2 hours provided the other SDC loop is OPERABLE and in operation.</p> <p>However, ITS 3.4.7 NOTE 2 changes the word "loop" to the word "train," so the last of the sentence reads, ". . . provided the other SDC train is OPERABLE and in operation."</p> <p>The terms loop and train are not equivalent; there is no discussion or justification for this change from the CTS markup.</p>	<p>Provide discussion and justification for this change from the CTS markup, including why the term "train" is preferable to the term "loop" in this instance.</p> <p>Since, in some places in the ITS, the term train is left in, explain when there is a difference.</p>	

# ITS 3.6.8 IODINE REMOVAL SYSTEM

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.8-3	Bases JFD 8	STS 3.6.10 Bases - SR 3.6.10.1 ITS 3.6.8 Bases-BACKGROUND ITS B3.6.8 Bases-SR 3.6.8.1	STS 3.6.10 Bases-SR 3.6.10.1 states that the SR requirement to OPERATE each ICS train ensures that all trains are OPERABLE. "It also ensures that blockage, fan or motor failure or excessive vibration can be detected for corrective action." This last statement has been deleted from ITS B3.6.8 - Bases for SR 3.6.8.1. The justification (Bases JFD 8) provided does not correlate to this sentence, based on the system description provided in ITS B3.6.8 Bases-BACKGROUND.	5/16/97		Provide a discussion and justification for this deletion.
CCNPP Response:						

**CCNPP ITS 3.4.9 PRESSURIZER**

3.4.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4		JFD.21	STS SR 3.4.9.3 is deleted. There is inadequate discussion and justification for this STS deviation.	Provide discussion of the seeming conflict between Discussion of Deviations from NUREG # 21 and 26. Retain the SR.	
CCNPP Response:					



### CCNPP ITS 3.4.10 PRESSURIZER SAFETY VALVES

3.4.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1			Change in Applicability. from MODES 1, 2, 3, and 4	<b>Possible Beyond Scope Issue.</b> Additional justification is needed to deviate from the STS. The STS has an LTOP specification also that covers a different temperature. MOPDE 4 in this LCO is > [285], while the LTOP LCO is < [285]. Retain the LCO as is in the STS. Change Bases accordingly.	
CCNPP Response:					
2		JFD-8	CTS 3.4.2.1 LCO statement specifies the actual pressurizer safety valves that shall be OPERABLE and provides their respective As-Found and As-Left tolerances as a percent function of their lift settings. ITS 3.4.10 LCO statement requires 2 pressurizer safety valves OPERABLE. The above details for each valve are moved into ITS SR 3.4.10.1.	If the valve settings will be moved to the SR, the As-Left Tolerances, which corresponds to the STS should be left in also.	
CCNPP Response:					

### CCNPP ITS 3.4.10 PRESSURIZER SAFETY VALVES

3.4.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	M.1		The discussion of change states that ITS 3.4.10 adds an intermediate step to the shutdown track required by CTS 3.4.2.1. This is not the case. CTS 3.4.2.1 requires shutdown to MODE 4 within 12 hours with one pressurizer safety valve inoperable. ITS 3.4.10 only requires shutdown to MODE 3 within 6 hours and reducing RCS cold leg temperatures to $\leq 365^{\circ}\text{F}$ (Unit 1; $\leq 301^{\circ}\text{F}$ Unit 2) within 12 hours. ITS 3.4.10 does not require further shutdown to MODE 4. Therefore, the shutdown to MODE 3 is not an intermediate step.	Correct the discussion of change to accurately reflect the content of ITS 3.4.10.	
CCNFP Response:					
4	L.1		CTS 3/4.2.1 contains a footnote specifying that both pressurizer safety valves may be removed in MODE 5 provided that at least one valve is replaced by a spool piece which allows the pressurizer to relieve directly to the quench tank. This footnote is referenced to the L.1 discussion of change. ITS 3.4.10 does not contain any mention of the requirements contained in this footnote. There is no discussion or justification for this change.	Provide discussion and justification for this change to CTS requirements. Specify where this requirement is now located. Relocate to Bases?	
CCNPP Response:					

**CCNPP ITS 3.4.11 PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)**

3.4.11	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		JFD.25	ITS 3.4.11 Required Action A.1 broadens the applicability of CTS 3.4.3 Action a through a Note which allows delaying the Required Action for $\leq$ 120 hours if one block valve is inoperable and $\leq$ 72 hours if two block valves are inoperable. However, adding this Note to ITS 3.4.11 Required Action A.1 is a deviation from the STS. There is inadequate discussion and justification for this STS deviation.	<u>This May Be Beyond Scope</u> What does <u>consistent</u> with the current licensing basis mean? Is it or is it not? Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
CCNPP Response:					
2	LA.1		CTS Surveillance Requirement 4.4.3.1.a requires performing a Channel Functional Test at least once per 31 days in accordance with the Reactor Protective System (RPS) Pressurizer Pressure Surveillance Test Procedure. ITS SR 3.4.11.1 requires performing the CHANNEL FUNCTIONAL TEST, but does not specify that it be done in accordance with the RPS Pressurizer Pressure Surveillance Test Procedure, thereby moving the CTS requirement outside of the ITS into licensee-controlled documents. The discussion of change does not specify which licensee-controlled documents contain this requirement.	Specify the controls for the change process. (50.59?)	
CCNPP Response:					

**CCNPP ITS 3.4.11 PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)**

3.4.11	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		JFD.12	CTS Surveillance Requirement 4.4.3.1.a requires performing a CHANNEL FUNCTIONAL TEST once per 31 days. ITS SR 3.4.11.1 retains this CTS requirement. However, adding ITS SR 3.4.11.1 is a deviation from the STS. There is inadequate discussion and justification for this STS deviation.	Provide discussion based on current licensing basis, system design, or operational constraints.	
<b>CCNPP Response:</b>					
4	L.1		ITS 3.4.11 Action A relaxes the CTS 3.4.3 Action a requirement of having one or more PORV(s) with excessive seat leakage to one or more PORVs inoperable and capable of being manually cycled. CTS 3.4.3 Actions b and c specify Required Actions and Completion Times for one PORV (Action b) and both PORVs (Action c) inoperable for causes other than excessive seat leakage. ITS 3.4.11 Actions B and D change these CTS requirements to one PORV (Action B) and two PORVs (Action D) inoperable and not capable of being manually cycled respectively. are briefly addressed. The only discussion and justification for these changes to CTS Actions is a reference to the ITS 3.4.11 Action A less restrictive change. Although related to the ITS 3.4.11 less restrictive change, these changes are separate issues. There is inadequate discussion and justification for the CTS 3.4.3 Actions b and c changes.	Provide additional discussion and justification for the CTS 3.4.3 Actions b and c changes.  NOTE: THIS LCO HAS TO BE REVIEWED IN ITS ENTIRETY BEFORE THE MAGNITUDE OF CHANGES ARE ALL ACCEPTED.	
<b>CCNPP Response:</b>					

**CCNPP ITS 3.4.11 PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)**

3.4.11	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	L.2		<p>CTS Surveillance Requirement 4.4.3.1.a requires performing the PORV STE every 31 days. ITS SR 3.4.11.1 extends the SR-Frequency to 92 days. The discussion of change states that the PORV actuation instrumentation is the same as that used for the RPS High Pressurizer Pressure Function. The RPS High Pressurizer Pressure Function STE Surveillance Frequency was decreased from 31 days to 92 days in the RPS and ESFAS "monthly to quarterly" Technical Specification change (approved in an NRC Safety Evaluation Report for Amendments 193 and 170 for Units 1 and 2, respectively, dated August 24, 1994).</p>	<p>This change is not necessarily acceptable simply because of the approval of the amendments. These have to be evaluated in their own right.</p>	
CCNPP Response:					
6		JFD.12	<p>CTS Surveillance Requirements 4.4.3.1.a and b require performing a CHANNEL FUNCTIONAL TEST once per 31 days, and performing a CHANNEL CALIBRATION once per REFUELING INTERVAL respectively. ITS 3.4.11 retains these requirements by adding two SRs, ITS SR 3.4.11.1 and ITS SR 3.4.11.4. Adding these SRs is a deviation from the STS. There is inadequate discussion and justification in for this STS deviation.</p>	<p>Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.</p>	
CCNPP Response:					

**CCNPP ITS 3.4.11 PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)**

3.4.11	DCC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
7		JFD.11	STS 3.4.11 Action D requires shutting down to MODE 3 in 6 hours and to be in MODE 4 in 12 hours if the Required Actions and Completion Times of Condition A, B, or C are not met. ITS 3.4.11 Actions do not contain this requirement; it is deleted. Deleting this requirement in the ITS is a deviation from the STS. The justification for this deviation includes reference to Amendments 188 and 165 (for Units 1 and 2 respectively). There is inadequate discussion and justification for this STS deviation.	NOTE: THIS LCO HAS TO BE REVIEWED IN ITS ENTIRETY BEFORE THE MAGNITUDE OF CHANGES ARE ALL ACCEPTED.	
<b>CCNPP Response:</b>					
8		JFD.11	STS 3.4.11 Action E specifies the Required Actions and Completion Times for two PORVs inoperable and not capable of being manually cycled. STS 3.4.11 Required Action E.3 and E.4 require shutdown to MODE 3 in 6 hours and be in MODE 4 in 12 hours. ITS 3.4.11 Action D retains this requirement. However, ITS 3.4.11 Action D deletes the requirements of STS 3.4.11 Action E.3 and E.4. These STS requirements are replaced by ITS 3.4.11 Action D.3 which requires restoring one PORV to OPERABLE status in 72 hours. This is a deviation from the STS. The justification for this deviation includes reference to Amendments 188 and 165 (for Units 1 and 2 respectively). There is inadequate discussion and justification for this STS deviation.	Same	



**CCNPP ITS 3.4.11 PRESSURIZER POWER OPERATED RELIEF VALVES (PORVs)**

3.4.11	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
<b>CCNPP Response:</b>					
9		JFD.1	STS SR 3.4.11.4 is not included in the ITS 3.4.11 SRs. It is deleted. Deleting this STS SR is an STS deviation. There is inadequate discussion and justification for deleting this STS SR.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>CCNPP Response:</b>					

**CCNPP ITS 3.4.12 LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM**

3.4.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1			This LCO will has to BE looked at in its entirety again for conformance to your licensing basis and current requirements. It is difficult to know what is in the LCO because of amendments and what is there for other reasons. a road map would help.	What does "to make it consistent with"? Was the amendment issued for the particular change. Provide a detailed discussion of the changes allowed based on the amendments stated, not those that were deemed consistent with other changes that were allowed. It is necessary to distinguish actual changes allowed by amendments from those inferred by the amendment. Identify each amendment with each change and state specifically what these amendments allowed. Additional questions may then be generated.	
CCNPP Response:					

**CCNPP ITS 3.4.12 LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM**

3.4.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.4		<p>CTS 3.4.9.3 Action g actions are deleted in the ITS 3.4.12 Actions because they are addressed in other ITS requirements. Specifically, if excessive flow is encountered, the LTOP System is declared inoperable and the appropriate Actions of ITS 3.4.12 are entered. Similarly, if a P/T violation is found to have occurred, the appropriate Actions of ITS 3.4.3 are entered. The discussion of change also states that the CTS 3.4.9.3 Action g requirement to verify that the excessive flow did not raise pressure above the P/T limits is addressed in ITS 3.4.3. This is not the case; ITS 3.4.3 does not require this Action. There is inadequate discussion and justification for deleting this particular element of the CTS 3.4.9.3 Action g requirements.</p>	<p>Provide additional discussion and justification for deleting the requirement to verify a P/T violation did not occur during an excessive HPSI flow event. Specify where this requirement now resides.</p>	
CCNPP Response:					
3	LA.1		<p>CTS 3.4.9.3 LCO statements b, c, d, and e; and CTS 3.4.9.3 Actions e and f specify requirements for HPSI pump operation when the LTOP System is applicable. ITS 3.4.12 does not contain these requirements. The discussion of change states that these requirements are moved either fully or partially into plant procedures. However, it remains unclear which portions of the CTS requirements remain in the ITS.</p>	<p>Specify which portions of the CTS 3.4.9.3 LCO statements b, c, d, and e; and CTS 3.4.9.3 Actions e and f remain in ITS 3.4.12. Also state what goes to the Bases and what to Plant Procedures. Identify the change control process for Plant Procedures(50.59?).</p>	
CCNPP Response:					

**CCNPP ITS 3.4.12 LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM**

3.4.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	LA.1		CTS 3.4.9.3 LCO statements b, c, d, and e; and CTS 3.4.9.3 Actions e and f specify requirements for HPSI pump operation when the LTOP System is applicable. ITS 3.4.12 does not contain these requirements. The discussion of change states that these requirements are moved either fully or partially into plant procedures.	SAME AS ABOVE	
CCNPP Response:					
5		JFD.14	The CTS 3.4.9.3 LCO statement a.1 requires two PORVs with a trip setpoint below the curve in Figure 3.4.9-3. ITS 3.4.12 LCO statements a and b modify the CTS 3.4.9.3 LCO statement by adding the phrase "on or" to the CTS statement of "below the curve." This ITS 3.4.12 change to the CTS is a deviation from the STS. The discussion and justification for this STS deviation states that the changes are made to the STS to make it consistent with Amendments 188, 171, 146, and 145 (Unit 1); and Amendments 178, 165, and 131 (Unit 2).	SAME AS COMMENT # 1.	
CCNPP Response:					

**CCNPP ITS 3.4.12 LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM**

3.4.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6		JFD.14	<p>CTS 3.4.9.3 Action c requires depressurizing and venting the RCS and then maintaining the unit in the vented condition. ITS 3.4.12 Actions D and E retains the CTS 3.4.9.3 Action c requirement to depressurize and vent the RCS by requiring depressurizing and venting the RCS. However, ITS 3.4.12 Actions D is added to the STS 3.4.12 Actions, making this a deviation from the STS. The justification for this STS deviation states in part that the changes are made to the STS to make it consistent with Amendments 188, 171, 146, and 145 (Unit 1); and Amendments 178, 165, and 131 (Unit 2).</p>	see comment # 1	
CCNPP Response:					
7		JFD.24	<p>CTS 3.4.9.3 MODES OF APPLICABILITY requires RCS temperature <math>\leq 365^{\circ}\text{F}</math> and the RCS vented to <math>&lt; 8</math> square inches. ITS 3.4.12 MODES OF APPLICABILITY changes the CTS MODES OF APPLICABILITY to specify MODE 3 with all RCS cold leg temperatures <math>\leq 365^{\circ}\text{F}</math> (Unit 1) and <math>\leq 301^{\circ}\text{F}</math> (Unit 2), and MODES 4, 5, and 6. This change in the CTS MODES OF APPLICABILITY is a deviation from the STS.</p>	Provide discussion regarding system design.	
CCNPP Response:					

# CCNPP ITS 3.4.12 LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM

3.4.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8		JFD.14	The CTS 3.4.9.3 MODES OF APPLICABILITY requirement that the RCS is vented to < 8 square inches is moved to a Note in the ITS 3.4.12 MODES OF APPLICABILITY. Adding this Note to the ITS 3.4.12 MODES OF APPLICABILITY is a deviation to the STS. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131.	SEE COMMENT # 1	
CCNPP Response:					
9		JFD.14	In addition to the HPSI pump requirement, the STS 3.4.12 LCO statement requires one charging pump capable of injecting into the RCS and having the SITs isolated. The ITS 3.4.12 LCO statement does not include the charging pump and SIT requirements. This is a deviation from the STS. There is inadequate discussion and justification for this STS deviation. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131.	SAME	
CCNPP Response:					



**CCNPP ITS 3.4.12 LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM**

3.4.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
10		JFD.14	ITS 3.4.12 adds a new LCO statement requiring one OPERABLE PORV with lift setting on or below the curve in Figure 3.4.12-1 and RCS vent of $\geq$ 1.3 square inches. This new ITS LCO statement is a deviation from the STS. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131.	SAME	
CCNPP Response:					
11		JFD.14	ITS 3.4.12 adds a new Note to the LCO statements specifying HPSi pump restrictions and PORV lift settings when in shutdown cooling. This new ITS LCO Note is a deviation from the STS. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131.		
CCNPP Response:					

**CCNPP ITS 3.4.12 LOW TEMPERATURE OVERPRESSURE PROTECTION (LTOP) SYSTEM**

3.4.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
12			The STS 3.4.12 MODES OF APPLICABILITY Note is deleted in the ITS 3.4.12 MODES OF APPLICABILITY. The STS MODES OF APPLICABILITY Note specifies SIT limitations related to RCS cold leg temperatures and P/T limit curves. Deleting this Note in the ITS is a deviation from the STS. There is no discussion or justification for deleting this Note.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
<b>CCNPP Response:</b>					
13		JFD.20	STS SR 3.4.12.4 requires verifying RCS vent $\geq$ [1.3] square inches is open once per 12 hours for unlocked open vent valve(s) and once per 31 days for locked open vent valve(s). This requirement is contained in ITS SR 3.4.12.2. However, the ITS SR changes the STS requirement by adding a Note to the 31 day Frequency specifying that the 31 day Frequency is applicable to the pressurizer manway. This change is a deviation from the STS. There is inadequate discussion and justification for this STS deviation.	<p>Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.</p> <p>Explain what the pressurizer manway has to do with this SR and why.</p> <p>THIS MAY BE A BEYOND SCOPE ISSUE</p>	
<b>CCNPP Response:</b>					

### CCNPP ITS 3.4.13 RCS OPERATIONAL LEAKAGE

3.4.13	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.2		ITS 3.4.13 does not contain the RCS leakage instrumentation referenced by CTS 3.4.6.2. The discussion of change states that the deleted monitors are required by other ITS Specifications, but does not specify which ones.	Specify the ITS Specifications that now contain these SRs.	
CCNPP Response:					
4	A.3		Most of the discussion focuses on the addition of ITS SR 3.4.13.2 to the CTS 3.4.6.2 requirements. However, at the end of the discussion, the focus changes to the addition of an "OR" statement to ITS 3.4.13 Action B. The discussion states that the "OR" statement is added to CTS 3.4.6.2 Action a ("With any PRESSURE BOUNDARY LEAKAGE, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours."). The new ITS 3.4.13 Action B "OR" statement specifies "One or more SGs inoperable." to account for a Condition with one or two SGs inoperable. The new ITS 3.4.13 Action B "OR" statement adds a requirement to CTS 3.4.6.2 and is therefore a more restrictive change. There is inadequate discussion and justification to support this more restrictive change. This more restrictive change is not consistent with the STS. Additionally, the STS markup for this change references TSTF 138.	TSTF 138 was rejected by NRC 4/11/97. Revise LCO accordingly.	
CCNPP Response:					

# CCNPP ITS 3.4.13 RCS OPERATIONAL LEAKAGE

3.4.13	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	A.5		<p>ITS SR 3.4.13.2 requires verifying SG tube integrity per the Steam Generator Tube Surveillance Program. CTS 3.6.4.2 does not contain this requirement, nor does the discussion present issues associated with CTS 3.6.4.2. Instead, the discussion focuses on CTS LCO 3.4.5, "Steam Generators," which requires each SG Operable, and specifies required SG tube Surveillance Requirements. CTS 3.4.5 is incorporated into ITS 5.5.9, "Steam Generator (SG) Tube Surveillance Program." Although ITS 3.4.13 neither specifically requires the SGs Operable, nor specifies SG tube SRs, it does place limits on RCS leakage; indirectly requiring the SGs Operable. CTS 3.4.5 is included with the CTS 3.6.4.2 markup, and is the location of the A.5 comment. The discussion states that CTS 3.4.5 is incorporated into ITS 3.4.13. This is not the case. CTS 3.4.5 is incorporated into ITS 5.5.9. ITS SR 3.4.13.2 adds a requirement to the CTS and is therefore a more restrictive change. There is no discussion or justification for this more restrictive change. Additionally, the discussion states that SG OPERABILITY is determined by SG tube inspections per CTS 3.4.5 and ITS 5.5.9. However, SG OPERABILITY includes other factors besides tube inspections such as water level and temperature. The discussion makes no reference to where those requirements have gone. Finally, the discussion states the change is consistent with TSTF 138.</p>	SAME AS ABOVE	
CCNPP Response:					

# CCNPP ITS 3.4.13 RCS OPERATIONAL LEAKAGE

3.4.13	DOC	JFC	CHANGE/DIFFERENCE	COMMENT	STATUS
6	M.1		The discussion states that this more restrictive change is consistent with both the STS and TSTF 138. The STS markup contains a "cloud" with the STS 3.4.13 Condition B added "OR" requirement for one or more SGs inoperable. The STS does not contain this requirement. Additionally, this change is referenced to TSTF 138.	SAME AS ABOVE	
CCNPP Response:					
7	L.1		The discussion of change focuses on the deletion of CTS Surveillance Requirements in ITS 3.4.13. However, the discussion and justification do not adequately describe how performing the RCS water inventory balance required by ITS SR 3.4.13.1 effectively replaces the monitoring functions performed by the CTS Surveillance Requirements.	Are these same requirements in Leakage Detetion?	
CCNPP Response:					



# CCNPP ITS 3.4.14 RCS LEAKAGE DETECTION INSTRUMENTATION

3.4.14	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		L.6	Notes are added to ITS 3.4.14 Actions A.1 and B.1.2 that allow waiting 12 hours after steady state conditions are established before performing a RCS inventory balance. CTS 3.4.6.1 does not allow this wait. The original STS 3.4.14 version does not contain these Notes either. The STS 3.4.14 markup inserts these notes with a reference to TSTF-116.	Acceptance of this change is contingent upon NRC approval of TSTF-116.	
CCNPP Response:					
2			CTS Surveillance Requirement 4.4.6.1 a references the Frequencies specified in Table 4.3-3. There are numerous changes to Table 4.3-3 with the only change referenced to A.1. There is inadequate discussion and justification for the changes noted.	Provide discussion and justification for the indicated changes. Specifically discuss how these requirements are addressed by the ITS 3.4.14 SRs.	
CCNPP Response:					
3			The CTS 3.4.6.1 markup includes a Table 3.3-6 that contains several changes. The only reference to a discussion is A.1 and to see the discussion of change for 3.3.3.1, "Radiation Monitoring Instrumentation." There is no discussion or justification for the noted changes in any of the discussion of change files for 3.4.6.1. In fact, CTS 3.4.6.1 does not reference Table 3.3.-6 at all.	Provide discussion and justification for the indicated changes on Table 3.3.-6. Specifically address how these changes relate to CTS 3.4.6.1 and ITS 3.4.14.	
CCNPP Response:					



# CCNPP ITS 3.4.15 RCS SPECIFIC ACTIVITY

3.4.15	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			No comment for 3.4.15		

CCNPP ITS 3.4.16 SPECIAL TEST EXCEPTION (STE) RCS LOOPS - MODE 2

3.4.16	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			No comments for 3.4.16		

**CCNPP ITS 3.4.17 SPECIAL TEST EXCEPTION (STE) - MODES 4 AND 5**

3.4.17	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.1		<p>The markup for CTS Surveillance Requirement 4.10.5.2 changes the original wording of, "...prior to suspending reactor coolant circulation." to "...prior to suspending LCO 3.4.6, LCO 3.4.7, or LCO 3.4.8."</p> <p>This Surveillance Requirement is contained in ITS SR 3.4.17.1 which requires verifying xenon reactivity is within limits once within 1 hour prior to suspending LCO 3.4.6, LCO 3.4.7, or LCO 3.4.8. ITS 3.4.6, "RCS Loops - MODE 4," ITS 3.4.7, "RCS Loops - MODE 5, Loops Filled," and ITS 3.4.8, "RCS Loops - MODE 5, Loops Not Filled," each have notes allowing exceptions to their respective LCOs under certain conditions. Although this change is arguably an administrative change, it is not of the generic nature addressed by A.1. This change is consistent with the STS, but there is no discussion or justification for this specific element of the change.</p>	<p>Provide additional discussion and justification for this specific change referenced by A.1. Specifically discuss the respective requirements of ITS 3.4.6, 3.4.7, and 3.4.8 and justify how suspending them does not affect plant safety.</p>	
CCNPP Response:					

**CCNPP ITS 3.4.17 SPECIAL TEST EXCEPTION (STE) - MODES 4 AND 5**

3.4.17	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.2		<p>CTS 3.10.5.c requires verifying the shutdown margin per the requirements of CTS 3.1.1.2, "Shutdown Margin - <math>T_{avg} &lt; 200^{\circ}\text{F}</math>," once per eight hours when no SDC pumps or RCPs are in operation. This requirement is moved to ITS SR 3.4.17.4. However, the discussion of change references two ITS SRs (i.e., ITS SR 3.4.17.4 and 3.4.17.5) that now contain the original CTS 3.10.5.c requirements, and two Notes that amplify and modify the ITS SRs. Neither the STS 3.4.17 markup, nor ITS 3.4.17 contain SR 3.4.17.5 or the referenced Note 1. ITS SR 3.4.17.4 does have a Note that is the Note 2 referenced in the discussion of change. ITS 3.4.17 is consistent with STS 3.4.17. This change is not adequately justified in the discussion of change.</p>	<p>Correct the discussion of change to accurately reflect the ITS 3.4.17 contents.</p>	
CCNPP Response:					

CCNPP ITS SECTION 3.4 RELOCATED SPECIFICATIONS

3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
No Comments					

### RCS PIV Leakage

3.4.PIV	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			PIV Leakage specification should be retained.	LCO should be retained for consistency with the STS and also because there is nothing to preclude the inclusion of the LCO.	
CCNPP Response:					



## CCNPP ITS 3.6.1 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-1	A4	CTS 4.6.1.1.c CTS 4.6.1.1.d CTS 4.6.1.2 STS SR 3.6.1.1 ITS SR 3.6.1.1 and Associated Bases	CTS 4.6.1.1.c, CTS 4.6.1.1.d, and CTS 4.6.1.2 require leak rate testing in accordance with the Primary Containment Leakage Rate Testing Program. STS SR 3.6.1.1 requires the visual examination and leakage rate testing be performed in accordance with 10 CFR 50 Appendix J as modified by approved exemptions. ITS SR 3.6.1.1 modifies STS SR 3.6.1.1 to conform to CTS 4.6.1.1.c, CTS 4.6.1.1.d, and CTS 4.6.1.2 as modified by Amendment 219 for Unit 1 and Amendment 196 for Unit 2. The STS is based on Appendix J Option A while the CTS/ITS are based on Appendix J, Option B. Changes to the STS with regards to Option A versus Option B are covered by a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen, NEI dated 11/2/95 and TSTF 52. The ITS changes are not in conformance with the letter or TSTF 52 as modified by staff comments.	5/16/97		Licensee to update submittal with regards to 11/2/95 letter and updated TSTF 52 when OG provides revision or provides additional justification for deviations.
CCNPP Response:						

## CCNPP ITS 3.6.1 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-2	A.4	CTS 4.6.1.1.c	CTS 4.6.1.1.c which requires verifying that each containment air lock is in compliance with the requirements of CTS 3.6.1.3 is deleted. No justification is provided for this deletion. A.4 only discusses the Containment Leakage Rate Programs.	5/16/97		Provide a discussion and justification for this deletion.
CCNPP Response:						

## CCNPP ITS 3.6.1 CONTAINMENT

ITEM NO.	DGC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-3	A.5 Bases JFD 7	CTS 3.6.1.6 ACTION a and b. ITS B3.6.1 Bases SR 3.6.1.2	Unit 1 CTS 3.6.1.6 ACTION b requires an engineering evaluation that assures the structural integrity prior to increasing RCS temperature > 200°F when the containment is not in conformance with CTS 4.6.1.6.2-End Anchorages and Adjacent Concrete Surfaces and 4.6.1.6.3-Containment Surfaces. A.5 equates this Action with CTS 3.6.1.6 ACTION a which requires a shutdown to MODE 5 in 36 hours. This comparison is incorrect. CTS 3.6.1.6 allows 90 days to restore integrity or perform the engineering evaluation, but it only applies if containment integrity does not meet the criteria of CTS 4.6.1.6.1-Containment Tendons. If the criteria of CTS 4.6.1.6.2 and CTS 4.6.1.6.3 are not met when the RCS temperature is > 200°F, then an immediate entry into CTS 3.0.3 is required. Thus the justification is wrong. A justification similar to A.3 would be more appropriate. See Item Numbers 3.6.1-4 and 3.6.1-5.	5/16/97		Provide additional discussion and justification for this Administrative change. See Item Number 3.6.1-4 and 3.6.1-5.

## CCNPP ITS 3.6.1 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
CCNPP Response:						
3.6.1-4	LA.1 L.1 Bases JFD7	CTS 3.6.1.6 ACTION a. ITS B3.6.1 Bases-SR 3.6.1.2	Unit 1 CTS 3.6.1.6 ACTION a allows 90 days to restore containment tendon integrity or perform an engineering evaluation that assures the structural integrity when the containment tendons are not in conformance with CTS 4.6.1.6.1. This requirement is being moved to ITS B3.6.1 BASES - SR 3.6.1.2. The relocation of this requirement to ITS B3.6.1 BASES SR 3.6.1.2 is unacceptable. ITS 3.6.1 ACTIONS require containment be restored to OPERABLE status within 1 hour or shutdown to MODE 5 in 36 hours. It does not allow 90 days to restore or perform an engineering evaluation. Therefore, the 90 days is considered as an Allowed Outage Time (AOT) specific to Unit 1 CCNPP and would require appropriate Conditions, RAs, and Completion Times. See Item Numbers 3.6.1-3 and 3.6.1-5.	5/16/97		Either delete this requirement and provide discussion and justification for this deletion (More Restrictive (M)), or provide the appropriate Conditions, RAs and Completion Times in ITS 3.6.1 as well as appropriate discussion and justification for this administrative change. See Item Numbers 3.6.1-3 and 3.6.1-5.
CCNPP Response:						

## CCNPP ITS 3.6.1 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1-5	LA.1 L.1 Bases JFD7	Unit 1 CTS 3.6.1.6 ACTIONS a and b Unit 2 CTS 3.6.1.6 ACTION ITS B3.6.1 BASES- SR 3.6.1.2	Unit 1 CTS 3.6.1.6 ACTION a allows 90 days to restore containment tendon integrity or perform an engineering evaluation that assures the structural integrity when the containment tendons are not in conformance with CTS 4.6.1.6.1. This requirement is being moved to ITS B3.6.1 Bases-SR 3.6.1.2. The unacceptability of the relocation is discussed in Item Number 3.6.1-4. However, retention of this requirement in the ITS in the form it is now is unacceptable. Unit 1's current licensing basis has this AOT requirement applying only to containment tendons (CTS 3.6.1.6 ACTION a/CTS 4.6.1.6.1), not to end anchorages and adjacent concrete surfaces (CTS 3.6.1.6 ACTION b/CTS 4.6.1.6.2) and containment surfaces (CTS 3.6.1.6 ACTION b/CTS 4.6.1.6.3) and see Item Numbers 3.6.1-3. In addition, Unit 2 CTS 3.6.1.6 ACTION does not include this requirement. Unit 2 CTS 3.6.1.6 ACTIONS allows 24 hours to restore integrity, not 90 days. Furthermore, Unit 2 changes the 24 hours	5/16/97		Either delete this requirement and provide discussion and justification for this deletion (More Restrictive (M)) or provide, only for Unit 1 containment tendons inoperable, the appropriate Conditions, RAs, and Completion Times as well as appropriate discussion and justification for this Administrative/Less Restrictive change. See Item Numbers 3.6.1-3, and 3.6.1-4.

## CCNPP ITS 3.6.1 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			change. Therefore, to implement this change as proposed would require a staff evaluation with regards to CTS 3.6.1.6 ACTION b and Unit 2 CTS 3.6.1.6 ACTION. This is beyond the scope of review for this conversion.			
CCNPP Response:						
3.6.1-6	None	CTS 4.6.1.1.d ITS 5.5.1.6	CTS 4.6.1.1.d was added by Unit 1 Amendment No. 221 and Unit 2 Amendment No. 197 to allow use of blind flanges for the Containment Purge System instead of the two outboard 48 inch isolation valves during MODES 1 to 4. Insert A in the CTS markup differs from the staff approved amendments (197 and 221) and the insert 5.5.16 in ITS 5.5.1.6.	5/16/97		Correct this discrepancy.
CCNPP Response:						
3.6.1-7	Bases None	ITS 5.5.6 ITS B3.6.1 Bases REFERENCES	ITS B3.6.1 Bases-REFERENCES lists Reference 4 as Regulatory Guide 1.35 Revision 0, while ITS 5.5.6 specifies Revision 2 of the same document.	5/16/97		Correct this discrepancy.
CCNPP Response:						



## CCNPP ITS 3.6.2 CONTAINMENT AIR LOCK

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2-1	A.5	CTS 4.6.1.3a ITS B3.6.2 BASES	See Item Number 3.6.1-1	5/16/97		See Item Number 3.6.1-1.
CCNPP Response:						
3.6.2-2	L.2	CTS 3.6.1.3 ACTION b ITS 3.6.2 ACTION A and C and Associated Bases	CTS 3.6.1.3 ACTION b requires that when an air lock is inoperable as a result of an inoperable door gasket, that the OPERABLE door of the air lock be maintained locked closed and sealed, and the air lock restored to OPERABLE status within 7 days. L.2 states that the appropriate ACTION to follow in this case is ITS 3.6.2 ACTION A. This is incorrect. The appropriate ACTION to enter in this condition is ITS 3.6.2 ACTION C. The basis for this is found in ITS B3.6.2 BASES RA C.1. Thus the change becomes a more restrictive change. See Item Number 3.6.2-3.	5/16/97		Provide additional justification and discussion for this More Restrictive change. See Item 3.6.2-3.
CCNPP Response:						

# CCNPP ITS 3.6.2 CONTAINMENT AIR LOCK

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2-3	L.4	CTS 3.6.1.3 ACTION B ITS 3.6.2 RA A Note 2	ITS 3.6.2 ACTION RA A contains a Note 2 which allows entry and exit into containment for seven days under administrative controls if both air locks are inoperable. The justification L.4 uses CTS 3.6.1.3.b as part of the basis for adding this Note. Bases on Item Number 3.6.2-2, L.4 is incorrect.	5/16/97		Provide additional justification and discussion for this Less Restrictive change.
CCNPP Response:						
3.6.2-4	None	STS 3.6.2 Bases SR 3.6.2.2 ITS B3.6.2 Bases SR 3.6.2.2	Changes are made to STS B3.6.2 Bases SR 3.6.2.2 to bring it into conformance with TSTF-17. The changes made do not conform to the approved version of TSTF0-17.	5/16/97		Licensee to update submittal with regards to TSTF-17 or provide additional discussions and justifications for the deviations.
CCNPP Response:						

## CCNPP ITS 3.6.3 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-1	A.5	CTS 3.6.4.1 ITS 3.6.3	ITS 3.6.3 will contain an ACTIONS Note 2 which allows separate condition entry for each penetration flow path. CTS 3.6.4.1 ACTIONS do not contain this requirement. The justification states that the Note is consistent with the intent of the CTS ACTIONS for the containment air locks. This is incorrect. The justification needs to be consistent with the CTS for containment isolation valves, since the same change was done for containment air locks.	5/16/97		Provide additional discussion and justification for this Administrative change.
CCNPP Response:						

## CCNPP ITS 3.6.3 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-2	M.2 BASES JFD 6	CTS 3.6.4 ACTIONS ITS 3.6.3 RA B.2 and Associated BASES	ITS 3.6.3 RA B.2 contains requirements to verify the affected penetration flow path is isolated once per 31 days for isolation devices outside Containment. ITS 3.6.3 RA B.2 contains an additional requirement for isolation devices inside Containment to verify the affected penetration flow path is isolated prior to entering MODE 4 from MODE 5, if not performed within the previous 92 days. ITS 3.6.3 RA B.2 is modified by a Note allowing isolation devices in high radiation areas verified administratively. CTS 3.6.4.1 does not contain this allowance. The STS markup for ITS 3.6.3 B.2 references TSTS-145 as justification for adding B.2. The changes to ITS B3.6.3 Bases-RA B.1 and B.2 is not in accordance with TSTF 145 as modified by the staff.	5/16/97		Licensee to update submittal in accordance with TSTF-145 as modified by the staff or provide additional discussion and justification for the deviations.
CCNPP Response:						
3.6.3-3	M.3 L.5 JFD 5 BASES JFD 6	CTS 3.6.1.1 *Footnote	See Item Number 3.6.7-1	5/16/97		See Item Number 3.6.7-1

CCNPP ITS 3.6.3 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
CCNPP Response:						
3.6.3-4	LA.2	CTS 4.6.4.1.1	The post-maintenance testing required by CTS 4.6.4.1.1 is not contained in ITS 3.6.3. Rather, this requirement is moved into plant procedures. This places requirements outside of the ITS into Licensee controlled documents. There is not an adequate discussion and justification of how specific post-maintenance testing requirements are addressed and controlled by plant procedures.	5/16/97		Provide a description of the plant procedures to which the post-maintenance testing requirements are relocated and the change control process for these procedures.
CCNPP Response:						

## CCNPP ITS 3.6.3 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-5	L.3	CTS 4.6.1.1.a and Associated **Footnote ITS SR 3.6.3.2 ITS SR 3.6.3.3 and Associated Bases	CTS 4.6.1.1.a requires verifying once per 31 days that all penetrations not capable of being closed by OPERABLE containment automatic isolation valves, but that are required to be closed during accident conditions, are closed by valves, blind flanges, or deactivated automatic valves secured in their positions. Footnote** to CTS 4.6.1.1 excepts those valves, blind flanges, or deactivated automatic valves located inside containment from the 31 day verification frequency, but specifies that they must be verified during each MODE 5 if not performed in the previous 92 days. ITS SRs 3.6.3.2 and 3.6.3.3 require performing the same verification. However, they are modified by a Note which allows verifying valves, blind flanges, or equivalent in high radiation areas by administrative means. The CTS markup for CTS 4.6.1.1.a inserts the phrase "and are not locked, sealed, or otherwise secured." There is no discussion or justification provided for	5/16/97		Provide additional discussion and justification for adding the phrase "and are not locked, sealed, or otherwise secured" to CTS 4.6.1.1.a. See Item Number 3.6.3-13.



## CCNPP ITS 3.6.3 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			inside containment; not all valves or valves outside containment which is not the focus of L.3. See Item Number 3.6.3-13.			
CCNPP Response:						
3.6.3-6	L.6 L.7	CTS 4.6.1.1.a CTS 3.6.4.1 ACTION C ITS 3.6.3 RA A.1 ITS 3.6.3 RA B.1 ITS 3.6.3 RA C.1 ITS SR 3.6.3.2 ITS SR 3.6.3.3 and Associated Bases	CTS Surveillance Requirement 4.6.1.1.a requires all penetrations not capable of being closed by OPERABLE CIVs, and are required closed during accident conditions, are verified closed by valves, blind flanges, or deactivated automatic valves secured in their positions. ITS 3.6.3 RA A.1, ITS 3.6.3 RA B.1, ITS 3.6.3 RA C.1, ITS SR 3.6.3.2 and ITS SR 3.6.3.3 allow penetrations to be isolated by an equivalent isolation device. The STS markup for this change references CEOG-112. CEOG-112 is TSTF 196 which has been rejected by the staff.	5/16/97		Delete this change.
CCNPP Response:						
3.6.3-7	Bases JFD 3	ITS B.3.6.3 Bases- RA C.1 and C.2	ITS B3.6.3 Bases- RA C.1 and C.2 last paragraph has no changes associated with it. Yet it is marked with Bases JFD 3.	5/16/97		Correct this discrepancy.
CCNPP Response:						

CCNPP ITS 3.6.3 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3-8	None	CTS 3.6.4.1 ACTIONS ITS 3.6.3 Conditions A and B and Associated Bases.	CTS 3.6.4.1 ACTIONS adds a Note to bring the CTS into conformance with ITS 3.6.3 Conditions A and B. No justification is provided for this administrative change.	5/16/97		Provide a discussion and justification for this administrative change.
CCNPP Response:						
3.6.3-9	None	CTS 3.6.4.1 ACTIONS ITS 3.6.3 Condition C and Associated Bases	CTS 3.6.4.1 ACTIONS adds a Note to bring the CTS into conformance with ITS 3.6.3 Condition C. No justification is provided for this administrative change. See Item Number 3.6.3-12.	5/16/97		Provide a discussion and justification for this administrative change. See Item Number 3.6.3-12.
CCNPP Response:						
3.7.3-10	None	CTS 4.6.4.1.1 # Footnote	CTS 4.6.4.1.1 # Footnote is being moved from CTS 3.6 to ITS 3.3.7 "Containment Radiation Signal." No justification is provided for this administrative change.	5/16/97		Provide a discussion and justification for this administrative change.
CCNPP Response:						
3.6.3-11	None	CTS 4.6.1.1.b, 4.6.1.1.c, and 4.6.1.1.d	CTS 4.6.1.1.b, 4.6.1.1.c, and 4.6.1.1.d are being moved from CTS 3.6 to ITS 5.5.16. No justification is provided for this administrative change.	5/16/97		Provide a discussion and justification for this administrative change.

CCNPP ITS 3.6.3 CONTAINMENT

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
CCNPP Response:						
3.6.3-12	None	STS 3.6.3 Condition C ITS 3.6.3 Condition C and Associated Bases	ITS 3.6.3 Condition C modifies STS 3.6.3 Condition C and associated Note to include more than one containment isolation valve in a closed system. The change is designated CEOG-106. It is the staff's understanding that this change is not generic and has been withdrawn from the generic review process, but will be submitted as a plant specific change.	5/16/97		Provide a discussion and justification based on current licensing basis, system design, or operational constraints.
CCNPP Response:						
3.6.3-13	None	STS SR 3.6.3.3 STS SR 3.6.3.4 and Associated Bases ITS SR 3.6.3.2 ITS SR 3.6.3.3 and Associated Bases	STS SR 3.6.3.3, SR 3.6.3.4 and their associated Bases have been modified by TSTF 45 Rev. 1. ITS SR 3.6.3.2 and SR 3.6.3.3 have incorporated TSTF 45. However, their associated bases are not in accordance with TSTF-45.	5/16/97		Licensee to update submittal in accordance with TSTF 45 Rev 1 or provide additional discussion and justification for the bases deviation.
CCNPP Response:						

# CCNPP ITS 3.6.4 CONTAINMENT PRESSURE

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
No comments for 3.6.4						

## CCNPP ITS 3.6.5 CONTAINMENT AIR TEMPERATURE

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.5-1	LA 2	CTS 4.6.1.5 ITS B3.6.2 BASES SR 3.6.5.1	CTS 4.6.1.5 requires determining the containment average air temperature as the arithmetical average of the temperature at the containment dome and the containment reactor cavity. ITS SR 3.6.5.1 requires determining the primary containment average air temperature, but does not specify temperature indication locations. The temperature indication locations are moved into the Bases and plant procedures. ITS B.3.6.2 Bases-SR 3.6.5.1 does not specify the temperature indication locations, nor is it specified elsewhere in ITS B3.6.5. The specific plant procedures and associated controls are not indicated.	5/16/97		Specify the temperature indication locations in ITS B3.6.5 BASES-SR 3.6.5.1.  Provide a description of the plant procedure to which the temperature indication locations are relocated and the change control process for these procedures.
CCNPP Response:						

## CCNPP CTS 3/4.6.5.1 HYDROGEN ANALYZERS

ITEM NO.	DGC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3/4.6.5.1-1	None	CTS 3/4.6.5.1	CTS 3/4.6.5.1 is being moved to ITS 3.3.10 "Post Accident Monitoring Instrumentation." No justification has been provided for this Administrative change.	5/16/97		Provide a discussion and justification for this Administrative change.
CCNPP Response:						



CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.6-1	A.1 LA.4	CTS 4.6.2.1. a.1 CTS 4.6.2.1.b. 1	CTS 4.6.2.1.a.1 and CTS 4.6.2.1.b.1 specify the Containment Spray System alignment for various test signals. LA.4 justifies the relocation of the test signals to the ITS Bases B3.6.6. The alignment characteristics are deleted with no justification and replaced with the words "activates to the correct position." This change is designated A.1. A.1 is a general reformatting justification, and is the incorrect justification for this change. The deleted alignment requirements should be relocated to the ITS Bases B3.6.7 (Less Restrictive (LA) change) and the replacement words justified (Administrative change).	5/16/97		Provide additional discussion and justification for these Less Restrictive (LA) and Administrative changes.
CCNPP Response:						

CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.6-2	A.5	CTS 4.6.2.1.a.1 CTS 4.6.2.1.c. CTS 4.6.2.1.b.1 CTS 4.6.2.1.c.2 CTS 4.6.2.2.b	CTS 4.6.2.1.a.1, 4.6.2.1.b.1, 4.6.2.1.c.1, 4.6.2.1.c.2 and 4.6.2.2.b require that valves actuate to their correct position and that the containment spray pump starts on specific test signals. While this statement may be for the Containment Spray System, CTS 4.6.2.2.b deals with the Containment Cooling System. The Containment Cooling System according to the ITS Bases and the CTS is an entirely different system not connected to the Containment Spray System.	5/16/97		Provide additional discussion and justification to include the Containment Cooling System.
CCNPP Response:						

CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.6-3	M.1 L.4	CTS 4.6.2.1.a. 1 CTS 4.6.2.1.b. 1	Amendments 218 for Unit 1 and 195 for Unit 2 rearranged CTS 4.6.2.1.a.1, 4.6.2.1.A.2, 4.6.2.1.B.1, 4.6.2.1.b.2 and 4.6.2.1.c.2, to 4.6.2.1.b.1, 4.6.2.1.a.1, 4.6.2.1.c.1, 4.6.2.1.c. and 4.6.2.1.d respectively. ITS SR 3.6.6.1 requires verification that each containment spray manual, power-operated, and automatic valve in the flowpath that is not locked, sealed, or otherwise secured in position is in the correct position. M.1 states that CTS 3.6.2.1 does not contain this requirement. The staff has determined that ITS SR 3.6.6.1 is encompassed by the new CTS 4.6.2.1.a.1. Thus this part of the justification is an Administrative change.	5/16/97		Provide additional discussion and justification for this Administrative change.
CCNPP Response:						

# CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.6-4	M.4	CTS 3.6.2.2 ACTION a ITS 3.6.6 ACTION c	ITS 3.6.6 ACTION A and C contains a limit on the total combined duration of operation for one containment spray train (ACTION A) and one containment cooling train (ACTION C) inoperable of 10 days from discovery or failure to meet LCO. This will prevent continuous operation in a degraded condition by entering the two Actions repeatedly. M.4 states that CTS 3.6.2.1 and 3.6.2.2 do not contain this limitation. However, CTS 3.6.2.2 does have this limitation associated with it when one containment spray system is inoperable. CTS 3.6.2.2 ACTION c, requires 7 days from initial loss to restore the systems. Thus the change for CTS 3.6.2.2 is Less Restrictive not More Restrictive (7 days to 10 days).	5/16/97		Provide additional discussion and justification for this Less Restrictive change.
CCNPP Response:						

CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.6-5	LA.3	CTS 4.6.2.2.a. 3 ITS SR 3.6.6.3	CTS Surveillance Requirement 4.6.2.2.a.3 requires verifying cooling water flow when the flow service water outlet valves are fully open. ITS SR 3.6.6.3 requires verifying the flow rate, but does not specify valve position. This requirement is moved to plant procedures, placing it outside of the Technical Specifications into Licensee controlled documents, resulting in a Less Restrictive technical change.	5/16/97		Provide a description of the plant procedure to which the water flow requirement is relocated and the change control process for this procedure.
CCNPP Response:						



CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.6-6	L.1	CTS 3.6.2.1 ACTION STS 3.6.6 ACTION B ITS 3.6.6 ACTION B and Associated Bases	CTS 3.6.2.1 ACTION requires the plant in MODE 3 in 6 hours, and in MODE 5 within the following 30 hours when the Required Actions and associated Completion Times cannot be met. STS 3.6.6 ACTION B requires that the plant be in MODE 5 within 84 hours. ITS 3.6.6 ACTION B requires that the plant be in MODE 3 in 6 hours, and in MODE 3 with pressurizer pressure < 1750 psia within 84 hours. The STS Completion Times for RA B.2 was based on the APPLICABILITY being MODES 1 through 4. Since CCNPP's APPLICABILITY only goes to MODE 3 with pressurizer pressure < 1750 psia, the Completion Times in the CTS (36 hours to MODE 5) and ITS (84 hours to MODE 5) should be modified accordingly. This change may be More Restrictive or Less Restrictive depending on the Completion Time.	5/16/97		Modify the Completion Time for ITS 3.6.6 RA B.2 to reflect the actual time needed to exit the APPLICABILITY. Provide additional discussion and justification for this More/Less Restrictive change.
CCNPP Response:						



## CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.6-7	L.4	CTS 4.6.2.1.a. 1 CTS 4.6.2.1.b. 1 ITS SR 3.6.6.5 ITS SR 3.6.6.6	CTS Surveillance Requirements 4.6.2.1.a.1 and 4.6.2.1.b.1 require verification that the Containment Spray system (including RAS) valves and pumps to perform (actuate to the correct position and start, respectively) as required on an actuation signal once per 31 days and once per 92 days respectively. ITS SRs 3.6.6.5 and 3.6.6.6 require the test to be performed once per 24 months. ITS SRs 3.6.6.5 and 3.6.6.6 decrease the Frequency from 31 days and 92 days to 24 months. Although the surveillance frequency is being decreased, verification that the valves actuate and pumps start when required will still be performed in conjunction with the ESFAS subgroup relay tests which require end device actuation every 92 days. Justification L.4 does not state where this test is located. If it is located in ITS 3.3 then this portion of the change is an administrative change. If it is located in plant procedures or other licensee	5/16/97		Provide additional discussion, justification and appropriate marked up CTS pages for this Administrative/Less Restrictive change.

CCNPP ITS 3.6.6 CONTAINMENT SPRAY AND COOLING SYSTEMS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			controlled document then it is a Less restrictive (LA) change.			
CCNPP Response:						
3.6.6-8	JFD 6	ITS 3.6.6 ACTIONS Note	JFD 6 states that a Note 5 has been added to ITS 3.6.6 ACTIONS. ITS 3.6.6 ACTIONS show only one Note being added. There is no Note 5.	5/16/97		Correct this discrepancy.
CCNPP Response:						
3.6.6-9	BASES JFD 8	ITS B3.6.6 Bases-BACKGROUND	ITS B3.6.6 Bases-BACKGROUND "Containment Spray System" section second paragraph, first sentence changes the word "reduce" to "minimize." This change was reviewed by the staff as part of EDIT-18 and rejected based on the fact that it was a technical change with insufficient justification.	5/16/97		Delete this change.
CCNPP Response:						
3.6.6-10	None	ITS B3.6.6 Bases-BACKGROUND	ITS B.3.6.6 Bases-BACKGROUND "Containment Spray System" section second paragraph, first sentence and third paragraph deletes all reference to Spray Additive System. No justification is provided in this section for these deletions.	5/16/97		Provide a discussion and justification for these deletions.
CCNPP Response:						

CCNPP CTS 3/4.6.6.1 PENETRATION ROOM EXHAUST AIR FILTRATION SYSTEM

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3/4.6.6.1-1	None	CTS 3/4.6.6.1	CTS 3/4.6.6.1 is being moved to ITS 3.7.12 Penetration Room Exhaust Ventilation System. No justification has been provided for this Administrative change.	5/16/97		Provide a discussion and justification for this Administrative change.
CCNPP Response:						

# ITS 3.6.7 HYDROGEN RECOMBINERS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.7-1	L.1 Bases JFD 2	CTS 3.6.5.2 ITS 3.6.7 ACTION B and Associated Bases	<p>CTS 3.6.5.2 does not specify an ACTION when two hydrogen recombiners are inoperable. Therefore, if two hydrogen recombiners are inoperable, a shutdown per LCO 3.0.3 is required. ITS 3.6.7 Condition B adds Required Actions and Completion Times for two hydrogen recombiners inoperable. However, instead of requiring entry into the LCO 3.0.3 shutdown track as in CTS 3.5.6.2, ITS 3.6.7 ACTION B allows 7 days to restore one hydrogen recombiner to OPERABLE status when two are inoperable. ITS 3.6.7 ACTION B also requires administratively verifying the hydrogen control function within 1 hour after both hydrogen recombiners become inoperable, and every 12 hours thereafter. ITS B3.6.7 Bases-RA B.1 and B.2 and justification L.1 state that the hydrogen control function is provided by Containment Vent/Hydrogen</p>	5/16/97		<p>Provide additional discussion and justification based on current licensing basis, system design, or operational constraints as well as appropriate documentation to show that ITS 3.6.7 ACTION B applies to CCNPP and the CTS is in error.</p>
CCNPP Response:						

# ITS 3.6.7 HYDROGEN RECOMBINERS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			Purge System. However, CTS 3.6.1.1 *Footnote (justification M.3 in ITS 3.6.3) only allows the Containment Vent/Hydrogen Purge System to be open in MODES 1 to 4 for containment pressure control, airborne radioactivity control, and surveillance testing purposes, not for hydrogen control functions. Thus it would seem that ITS 3.6.7 ACTION B does not apply to CCNPP.			
CCNPP Response:						

# ITS 3.6.7 HYDROGEN RECOMBINERS

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.7-2	L.2	CTS 4.6.5.2.a STS SR 3.6.8.1 and Associated Bases ITS SR 3.6.7.1 and Associated Bases	CTS 4.6.5.2.a requires verifying that during a functional test of the hydrogen recombiner, the minimum heater sheath temperature increases to > 700°F within 90 minutes, and is maintained for at least 2 hours once per 6 months. ITS 3.6.7 does not contain this requirement. Rather, ITS SR 3.6.7.1 (hydrogen recombiner functional test) is a 24-month functional test which requires the heater sheath temperature to be increased to > 1200°F within 5 hours, and maintained for at least 4 hours. No justification is provided for changing the test parameters from a heater sheath temperature of >700° within 90 minutes and is maintained for at least 2 hours to > 1200°F to within 5 hours and maintained for at least 4 hours. STS B3.6.8 Bases-SR 3.6.8.1 has a testing requirement similar but less restrictive than CTS 4.6.5.2.a. It does not maintain the temperature for 2 hours, but increases it to maximum for approximately 2 minutes and verified to be >60 kw.	5/15/97		Provide additional discussion and justification based on current licensing basis, system design or operational constraints to justify the deviation from the CTS and STS.



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CCNPP Response:						
3.6.7-3	Bases JFD 10	STS B3.6.8 Bases- RA B.1 and B.2 ITS B3.6.7 Bases RA B.1 and B.2	STS B3.6.7 Bases RA B.1 and B.2 has a reviewer's Note in the text. ITS B3.6.7 Bases RA B.1 and B.2 deletes the Note using justification Bases JFD 10. Bases JFD 10 deals with the compliance of CCNPP to the General Design Criteria (GDC). The deletion of the Reviewer's Note has nothing to do with the GDC.	5/16/97		Provide additional discussion and justification for the deletion of the Reviewer's Note.
CCNPP Response:						

ITS 3.6.8 IODINE REMOVAL SYSTEM

ITEM NO.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.8-1	BASES JFD 3	STS B3.6.10 BASES SR 3.6.10.2 ITS B3.6.8 Bases- SR 3.6.8.2 ITS B3.6.8 BASES REFERENCES	STS B3.6.10 Bases for SR 3.6.10.2 states that "The ICS filter tests are in accordance with Regulatory Guide (RG) 1.52 (Ref. 3). "ITS B3.6.8 Bases for SR 3.6.8.2 deletes this statement and Reference 3 from ITS B.3.6.8 Bases REFERENCE Section. The basis for this deletion is that it was performed to ensure that the references are applicable to CCNPP. The testing requirements in CTS 4.6.3.1.b thru g reference RG 1.52 Rev. 2 and are relocated to ITS 5.5.11. ITS 5.5.11 states that the VFTP test shall be done in accordance with RG 1.52 Rev. 2. Therefore, the justification JFD 3 is wrong, and the STS statement and Reference 3 should be reinserted into ITS B3.6.8 Bases SR 3.6.8.2 and ITS B.3.6.8 Bases REFERENCES, respectively. Furthermore, the staff would consider this change as a generic change.	5/16/97		Reinsert the STS statement and Ref. 3 into the appropriate place in ITS B.3.6.8 Bases SR 3.6.8.2 and ITS B.3.8 Bases REFERENCES.
CCNPP Response:						

# ITS 3.6.8 IODINE REMOVAL SYSTEM

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.8-2	Bases JFD 8 JFD 11	STS B3.6.10 Bases-LCO ITS B3.6.8 BASES-BACKGROUND ITS B3.6.8 Bases LCO	STS B3.6.10 Bases-LCO states the following: "Two separate, independent, and redundant trains..." ITS B3.6.8 Bases-LCO deletes the words "separate, independent and redundant." ITS B3.6.8 BACKGROUND first sentence, second paragraph retains these words. The justifications (Bases JFD 8 and JFD 11) deal with consistency with CCNPP specific number, system name, terminology, safety analysis, plant system operation or design basis. This deletion does not fall under any of these categories.	5/16/97		Provide a discussion and justification for this deletion.
CCNPP Response:						