July 2, 1997

Mr. C. S. Hinnant, Vice President
Carolina Power & Light Company
Brunswick Steam Electric Plant
Post Office Box 10429
Southport, North Carolina 28461

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE TECHNICAL SPECIFICATION CHANGE REQUEST TO CONVERT TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS FOR THE BRUNSWICK STEAM ELECTRIC PLANT, UNITS NO. 1 AND 2 (TAC NOS. M97243 AND M97244)

Dear Mr. Hinnant:

By letter dated November 1, 1996, you submitted a request to convert the current Technical Specifications (TS) for the Brunswick Steam Electric Plant, Units 1 and 2, to be consistent with the Improved Standard Technical Specifications (ISTS) in NUREG-1433, "Standard Technical Specifications - General Electric Plants, BWR/4," Revision 1, dated April 1995. To complete our review, we need additional information requested in the enclosed table.

To support the NRC staff's review schedule, your written response to this request for additional information is expected within 30 days of the receipt of this letter. Should you have any questions, do not hesitate to contact me at (301) 415-2019.

Sincerely,

(Original Signed By)

David C. Trimble, Project Manager
Project Directorate II-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-325
and 50-324

Enclosure: As stated

cc w/enclosure:
See next page

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BNP ITS 3.4.1 RECIRCULATION LOOPS OPERATING

ITEM #	DOC or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.1-1	None	CTS 3.4.1.1.a 3.4.1.1.b CTS 3.4.1.1 Action a, line 2&3 CTS 3.4.1.1 Action b line 2,3,4,5 CTS 3.4.1.1 Action c CTS 3.4.1.1.3	The referenced CTS requirements address various topics related to total core flow, THERMAL POWER, associated Action Statements, and an APRM/LPRM baseline neutron flux surveillance. ITS deletes these requirements from the CTS based on the statement "Deleted by TSC 96TSB03".			Acceptance of the CTS changes are contingent upon NRC approval of TSC 96TSB03.
3.4.1-2	JFD4 L.1	CTS 3.4.1.1 Action a CTS 3.4.1.1 Action b ITS 3.4.1 Action A STS 3.4.1 Action A	CTS 3.4.1.1 ACTION b. allows 2 hours, with both recirc loops not in operation, to reduce thermal power and 12 hours to restore to two recirculation loop operation or the plant must be in Hot Shutdown within the next 12 hours. STS 3.4.1 Action A.1 provides 24 hours to return to two loop operation or to make required adjustments for single loop operation. ITS allows 6 hours to return to two loop operation or to make the required adjustments. The discussion is unclear as to why the 24 hours of the STS to make the adjustments for single loop operation cannot be justified and if it can't why then the 2 hours of the CTS should not be maintained.			Acceptance of CTS changes are also contingent upon NRC approval of TSC 96TSB03.

BNP ITS 3.4.1 RECIRCULATION LOOPS OPERATING

ITEM #	DOC or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.1-3	None	ITS 3.4.1 Action A.1 Bases	The intended meaning of "when the pump speeds between the two recirculation pumps ..." is unclear. Should it be "when the difference in the pump speeds..."?			
3.4.1-4	None	ITS 3.4.1 LCO and Applicable Safety Analyses Bases	What is the benefit of including cycle specific comments in the Bases and what will ensure that such comments are regularly updated, if included?			

BNP ITS 3.4.2 JET PUMPS

ITEM #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.2-1	LA.1	CTS 4.4.1.2.2	The CTS 4.4.1.2.2 requirement to demonstrate Operability of jet pumps prior to entering MODE 2 are moved to plant procedures. ITS 3.4.2, ITS SR 3.4.2.1, and ITS SR 3.0.1 requirements ensure maintaining the jet pumps OPERABLE prior to entering MODE 2. The plant procedure to which this requirement is moved was not identified but change control is specified as 10 CFR 50.59.			Provide identification of the plant procedure to which CTS 4.4.1.2.2 is moved to.

ENP ITS 3.4.3 SAFETY/RELIEF VALVES (SRVs)

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.3-1	JFD 10	CTS 3.4.2 ITS 3.4.3 STS 3.4.3	CTS 3.4.2 and STS 3.4.3 requires the safety function of all (11) reactor coolant system safety/relief valves OPERABLE. ITS 3.4.3 requires only 10 (of 11) relief valves OPERABLE. This deviation from CTS and STS requirements is changed by TSC 95TSB16.			Acceptance of the CTS and STS changes are contingent upon NRC approval of TSC 94TSB16.
3.4.3-2	JFD 1 JFD 9	CTS 3.4.2 ITS 3.4.3 STS SR 3.4.3.1	CTS 3.4.2 requires the lift settings of the safety/relief valves to be within +/- 1% of the CTS specified values. ITS SR 3.4.3.1. changes the lift setpoints of all SRVs and increases the tolerance to +/- 3%. This deviation from CTS 3.4.2 requirements is changed by TSC 95TSB16.			Acceptance of the CTS changes are contingent upon NRC approval of TSC 94TSB16.
3.4.3-3	none	CTS 3.4.2 Action a & b CTS action c ITS 3.4.3 ACTION A STS 3.4.3 ACTIONS A & B & C	CTS Action a, b, c specify the required actions for one, two or more INOPERABLE safety/relief valves. ITS 3.4.3 deletes CTS Actions a & b, and modifies CTS 3.4.2 action c to address "one or more required" INOPERABLE safety/relief valves. This change from CTS requirements and deviation from STS requirements is changed by TSC 95TSB16 and is a more restrictive change.			Acceptance of the CTS and STS changes are contingent upon NRC approval of TSC 94TSB16.

BNP ITS 3.4.3 SAFETY/RELIEF VALVES (SRVs)

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.3-4	None	SR 3.4.3.1	With 11 valves listed and only 10 required, the intent of the SR becomes unclear. If a valve is not one of the 10 required at that particular time does it have to be tested?			
3.4.3-5	None	SR 3.4.3.1	CTS 4.4.2 indicates the surveillance is IAW TS 4.0.5. ITS SR 3.4.3.1 indicates the SR is done IAW the ISTP. There is no DOC referenced for this change.			
3.4.3-6	JFD 10 and 11	CTS 4.4.2 ITS SR 3.4.3.2 STS SR 3.4.3.2	ITS SR 3.4.3.2 is added which requires the SRVs manually actuated every 24 months. This requirement does not exist in the CTS. STS SR 3.4.2.2 requires this test each "18 months on a staggered test basis for each valve solenoid." ITS 3.4.3.2 changes the SRV test interval from that of the STS. Since this requirement is not in the CTS, it is unclear what in the licensing basis supports the deviation from the STS or why the bracketed item is not applicable to the plant.			

BNP ITS 3.4.4 RCS OPERATIONAL LEAKAGE

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.4-1	None	ITS 3.4.4 Bases References	In 3.4.4 References it is NUREG 76/067 and in 3.4.5 it is 75/067.			
3.4.4-2	None	ITS 3.4.4 Background	Second para, last sentence should be RCPB rather than RCS pressure boundary.			
3.4.4-3	None	ITS 3.4.4 Bases Actions B-1 and B-2	While IGSCC is probably the most likely cause, why is discussion limited to that?			

BNP ITS 3.4.5 RCS LEAKAGE DETECTION INSTRUMENTATION

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.5-1	LE.1	ITS SR 3.4.5.3	Surveillance interval increased from 18 to 24 months			GL 91-04 update, contingent on NRC acceptance during instrumentation review.

BNP ITS 3.4.6 RCS SPECIFIC ACTIVITY

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.6-1	LA.1	CTS Table 4.4.5-1 Item 5	CTS Table 4.4.5-1 Item 5 requires performing an offgas isotopic analysis for xenon and krypton once per 31 days. These requirements are moved to plant procedures but the plant procedures are not identified.			Provide identification of the plant procedures to which this CTS requirement is moved to.

BNP ITS 3.4.7 RHR SHUTDOWN COOLING SYSTEM-HOT SHUTDOWN

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
None						

BNP ITS 3.4.8 RHR SHUTDOWN COOLING SYSTEM - COLD SHUTDOWN

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.8-1	None	ITS 3.4.8 Bases Background	The intent of "...decay heat must be removed for maintaining ..." is unclear. Should it be "in order to maintain"?			

BNP ITS 3.4.9 RCS PRESSURE AND TEMPERATURE (P/T) LIMITS

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.9-1	A.2	CTS 3.4.6.1 ACTION ITS 3.4.9 Required ACTION A.1 and C.2 STS 3.4.10 Required ACTION A.1 and C.2	With any RCS pressure/temperature limits exceeded, CTS 3.4.6.1 ACTION requires "performing an engineering evaluation to determine the effects of the out-of-limit condition on the fracture toughness properties of the RCS; determine that the system remains acceptable for continued operations." With any RCS pressure/temperature limits exceeded, ITS 3.4.9 Required ACTION A.1 and C.2 requires "Determine RCS is acceptable for continued operation." This change deletes the specific requirement for performing the engineering evaluation on fracture toughness without discussion or justification and is not contained in the ITS 3.4.9 Bases. Adding a discussion to the Bases that fracture toughness will be a topic of the continued operation determination would clarify the issue if the intent is to combine the two CTS requirements into one in the ITS.			

BNP ITS 3.4.9 RCS PRESSURE AND TEMPERATURE (P/T) LIMITS

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.9-2	A.4	CTS 3.4.1.3 ITS SR 3.4.9.4 ITS SR 3.4.9.5 STS SR 3.4.10.3 STS SR 3.4.10.4	CTS 3.4.1.3.a specifies a differential temperature limit between the "reactor coolant within the dome" and the "bottom head drain line". ITS SR 3.4.9.4 specifies this differential temperature limit as between the "reactor pressure vessel (RPV) coolant temperature" and the "bottom head coolant temperature". This terminology is different. No discussion is provided to establish the equivalency of these two differential temperature measurements or justify the difference.			
3.4.9-3	M-2	ITS 3.4.9	(1) M-2 discussion - do not exceed the minimum? (2) Granted that the 30 minute and 12 hour frequencies are more restrictive requirements but are they sufficiently restrictive at this plant to accomplish the intended purpose?			
3.4.9-4	None	ITS Figures 3.4.9-1,2,3 and 4.	Minimum reactor vessel metal temp as measured where? On the limiting component for that portion of the curve?			
3.4.9-5	A.1	ITS Figures 3.4.9-1,2,3, and 4.	Curves modified			Contingent on NRC acceptance of TSC 95TSB06. (96 in conversion cover letter)

BNP ITS 3.4.9 RCS PRESSURE AND TEMPERATURE (P/T) LIMITS

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.4.9-6	LA.3	CTS 3.4.1.3.c ITS SR 3.4.9.5 STS SR 3.4.10.4	CTS 3.4.1.3.c specifies recirculation system operational limits based on differential temperature, and operating loop flow values. ITS SR 3.4.9.5 requires that the differential temperature limits be maintained, but deletes the single loop operating flow limits. This operation limit is moved to plant procedures but the procedures are not identified.			

BNP ITS 3.5.1 ECCS — OPERATING

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-1	LD.3 JFD.10	CTS 4.3.3.3 ITS 3.5.1.12	CTS 4.3.3.3 requires RESPONSE TIME TESTING for the ECCS functions every 18 months. ITS 3.5.1.12 requires RESPONSE TIME TESTING for the ECCS injection/spray subsystem every 24 months. This change extends the surveillance test interval from 18 months to 24 months.			GL 91-04 update, contigent on NRC acceptance during instrumentation review.
3.5.1-2	A.2	CTS 4.3.3.3 ITS 3.5.1.12	CTS 4.3.3.3 requires RESPONSE TIME TESTING for the ECCS functions. ITS 3.5.1.12 exempts ECCS instrumentation from response time testing and allows using the design instrumentation response time in determining the ECCS RESPONSE TIME. The ECCS instrumentation was deleted based on the NEDO-32291-A, "System Analysis for Elimination of Selected Response Time Testing Requirements" results. Is this justification consistent with the NRC's most recent approval of the use of the topical report for Brunswick?			

BNP ITS 3.5.1 ECCS — OPERATING

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-3	L.2	CTS 3.5.1 CTS 3.5.2	ITS 3.5.1 adds Required Actions G.1, G.2, E.1, E.2, H.1, and H.2, not included in the CTS for an inoperable ADS valve coincident with an inoperable low pressure ECCS injection/spray system; an inoperable HPCI System coincident with an inoperable low pressure ECCS injection/spray subsystem; and an inoperable ADS valve coincident with the HPCI System. ITS 3.5.1 Actions E.1, E.2, G.1, G.2, H.1, and H.2 all have Completion times of 72 hours, CTS 3.5.1 and CTS 3.5.2 require entering CTS 3.0.3 for the same conditions. CTS 3.0.3 requires placing the plant in HOT SHUTDOWN in 6 hours and COLD SHUTDOWN within the following 30 hours. These changes were implemented based on NEDC-31624P, "Brunswick Steam Electric Plant Units 1 and 2 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," Revision 2, July 1990. The Completion Times are based on a reliability study (Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.			Beyond scope, separate NRC review required.

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-4	JFD.3	STS 3.5.1	ITS 3.5.1 adds Required Actions H.1 and H.2 that provide Actions when one required ADS valve is inoperable with the HPCI system inoperable. This requirement is not included in the CTS or STS. Implementing these changes is based on the capability of mitigating design basis accidents and transients. Including these actions result in a single failure having the potential for failing a safety function. Including these Actions is not consistent with the CTS or STS.			Beyond scope, separate NRC review required.
3.5.1-5	A.2	CTS 4.3.3.3	CTS 4.3.3.3 requires performing ECCS response time testing. ITS 3.5.1.12 adds a note that allows design instrumentation response time testing assumed for the instrumentation response time testing. STS 3.5.1 Surveillance Requirements do not include this allowance.			See comment #2 above.

BNP ITS 3.5.1 ECCS — OPERATING

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-6	L.11	CTS 4.5.1.b	CTS 4.5.1.b requires verifying the HPCI System capable of developing required flow for a system head corresponding to a reactor pressure of ≥ 1000 psig when steam is supplied at 1000 +20, -80 psig. ITS SR 3.5.1.7 changes the CTS requirements and requires verifying flow with steam supply pressure at 1025 and with reactor pressure ≤ 1045 psig and ≥ 945 psig, the HPCI pump unit capable of developing required flow against a system head corresponding to reactor pressure. The ITS changes the upper pressure limits from steam supply pressure of 1020 psig maximum to 1025 psig and reactor pressure from a maximum of 1020 psig to 1045 psig based on TSC 94TSB16 power uprate.			The upper pressure limit change is accepted contingent on the NRC accepting the TSC 94TSB16 power uprate.

BNP ITS 3.5.1 ECCS — OPERATING

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-7	L.11	CTS 4.5.1.c.2	CTS 4.5.1.c.2 requires verifying the HPCI System capable of developing required flow for a system head corresponding to a reactor pressure ≥ 165 psig when steam is supplied at 165 ± 15 psig. ITS SR 3.5.1.8 requires verifying, with reactor pressure ≤ 180 psig, the HPCI pump unit capable of developing required flow against a system head corresponding to reactor pressure. ITS SR 3.5.1.8 Bases states reactor pressure should be greater than or equal to 150 psig. Is one, the other or both the limit and what is the basis for the limit?			
3.5.1-8	LD.1 JFD.10	CTS 4.5.1.c	CTS 4.5.1.c requires performing ECCS system testing at least once per 18 months. ITS SR 3.5.1.8 and SR 3.5.1.9 changes the frequency to every 24 months. This is a change to the surveillance test interval.			GL 91-04 update, contingent on NRC acceptanceduring instrumentation review.

BNP ITS 3.5.1 ECCS — OPERATINC

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.3.1-9	L.5	CTS 3.5.2	ITS 3.5.1 reduces the number of ADS valves required OPERABLE in CTS 3.5.2 from seven to six. This change is based on the analysis summarized in NEDC-31624P, "Brunswick Steam Electric Plant Units 1 and 2 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," Revision 2, July 1990.			Beyond scope, separate NRC review required.
3.5.1-10	L.6	CTS 3.5.2	ITS 3.5.1 increases the pressure at which ADS is required OPERABLE, as stated in CTS 3.5.2, from 113 psig to 150 psig. This change is based on NEDC-31624P, "Brunswick Steam Electric Plant Units 1 and 2 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," Revision 2, July 1990.			Beyond scope, separate NRC review required.
3.5.1-11	LD.2 JFD.10	CTS 3.5.2	CTS 4.5.2.a and 4.5.2.b specify a once per 18 months frequency for the ADS system functional test and manual operation of each ADS valve. ITS SR 3.5.1.10 and ITS SR 3.5.1.11 specify a 24 month Frequency for these tests. This is a change in surveillance frequency.			CL 91-04 update contigent on NRC acceptance during instrumentation review.

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-12	L.7	CTS 3.5.3.1 CTS 3.5.3.2 STS 3.5.1	CTS 3.5.3.1 requires restoring an inoperable CS subsystem OPERABLE in 7 days if both LPCI subsystems are OPERABLE or be in Hot Shutdown within 12 hours and Cold Shutdown in 24 hours. CTS 3.5.3.1 also requires Hot Shutdown in 12 hours and Cold Shutdown in 24 if both CS subsystems are inoperable. CTS 3.5.3.2 requires the same actions for the LPCI system if the subsystem or LPCI pumps are inoperable. The ITS changes the CTS requirements to require restoring inoperable subsystems OPERABLE in 7 days for one low pressure ECCS injection/spray subsystem inoperable or one LPCI pump in each subsystem inoperable. The ITS also adds Action B for cases when one LPCI pump is inoperable and one core spray subsystem is inoperable that allows 72 hours to return one component or subsystem OPERABLE. These changes allow more than one LPCI and Core Spray subsystem or pumps inoperable at the same time which deviates from the current licensing basis and the STS.			Contingent on PRA LCO time extension.

BNP ITS 3.5.1 ECCS — OPERATING

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-13	L.9	CTS 4.5.3.1.c.1 4.5.3.2.b	ITS SR 3.5.1.6 revises the CTS 4.5.3.1.c.1 and CTS 4.5.3.2 h low pressure ECCS pump flow acceptance criteria from 17,000 gpm to 14,000 gpm for each LPCI loop (2 LPCI pumps) and from 4625 gpm to 4100 gpm for each core spray pump. This change is based on the plant analysis summarized in NEDC-31624P, "Brunswick Steam Electric Plant Units 1 and 2 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," Revision 2, July 1990.			Beyond scope, separate NRC review required.
3.5.1-14	LC.1	CTS 4.5.3.1.c.2 ITS 3.5.1	4.5.3.1.c.2 requires performing a CHANNEL CALIBRATION on the core spray header ΔP instrumentation. ITS 3.5.1 deletes this requirement. This Surveillance is moved to plant procedures. Changes to the requirements in plant procedures are controlled according to 10 CFR 50.59. The justification does not identify the procedures containing the Surveillance Requirement.			
3.5.1-15	L.1	ITS SR 3.5.1.5	The CTS required the SR during cold shutdown. The ITS allows it to be performed prior to 25% RTP. Was there a specific reason CTS limited this SR to cold shutdown?			

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.1-16	JFD.3	STS 3.5.1	The ITS adds a new ACTION B that was not included in the STS. ITS 3.5.1 ACTION B provides ACTION requirements for one LPCI pump and one core spray (CS) subsystem inoperable. The ACTION allows 72 hours to return the LPCI pump or CS subsystem OPERABLE. This change was included to allow various combinations of ECCS subsystems and components inoperable for 72 hours.			Provide justification for the STS deviation based on current licensing basis.
3.5.1-17	None	CTS 3.5.2.b STS 3.5.1	CTS 3.5.2.b identify actions for two or more inoperable ADS valves. STS 3.5.1 ACTION H requires action if one or more ADS valves and HPCI are inoperable. The ITS changes the number of inoperable ADS valves to two before requiring action. The ITS decreases the number of required OPERABLE ADS valves from seven to six Implementing the two inoperable ADS valves changes the CTS requirements so that actions may be required when three or more ADS valves are inoperable. This change does not appear to be within the current licensing basis.			See comment #9 above.

BNP ITS 3.5.2 ECCS — SHUTDOWN

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.2-1	L.2	CTS 4.5.3.1.c.1 ITS SR 3.5.2.5	CTS 4.5.3.1.c.1 CS pump flow acceptance criterion is revised in ITS SR 3.5.2.5 from 4625 gpm to 4100 gpm for each required CS pump. This change is implemented based on the plant analysis summarized in NEDC-31624P, "Brunswick Steam Electric Plant Units 1 and 2 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," Revision 2, July 1990.			Beyond scope, also affects L.4 discussion.
3.5.2-2	LD.1	CTS 4.3.3.3 ITS SR 3.5.2.7	CTS 4.3.3.3 specifies the frequency for ECCS RESPONSE TIME testing as once every 18 months. In ITS SR 3.5.2.7, the Frequency for ECCS RESPONSE TIME testing is every 24 months. This change extends the surveillance interval.			Generic Letter 91-04 update, contingent on NRC acceptance during instrumentation review.
3.5.2-3	M.4	ITS 3.5.2	1) Explain why 20 feet 6 inches above spent fuel is more restrictive than 23 feet above fuel in RPV. 2) Why is 21 feet 10 inches slightly more conservative and 3) In the () it should be 1 and 1/16 not 1 and 1/6.			
3.5.2-4	L.3	ITS 3.5.2	ECCS injection into the vessel is prohibited in CTS and allowed in ITS. L.3 does not explain why the specific prohibition was in there or why it is now ok to inject into the vessel.			

BNP ITS 3.5.2 ECCS — SHUTDOWN

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.2-5	LD.2	CTS 4.3.3.3	CTS 4.3.3.3 requires performing ECCS response time testing once per 18 months. ITS 3.5.2.7 adds requires ECCS design instrumentation response time testing once per 24 months. This is a change in the surveillance test interval.			GL 91-04 update, contingent on NRC acceptance during instrumentation review.
3.5.2-6	A.7	CTS 4.3.3.3	CTS 4.3.3.3 requires performing ECCS response time testing. ITS 3.5.1.12 adds a note that allows design instrumentation response time testing assumed for the instrumentation response time testing. STS 3.5.1 Surveillance Requirements do not include this allowance.			See comment #7 below.
3.5.2-7	A.7	CTS 4.3.3.3	CTS 4.3.3.3 requires RESPONSE TIME TESTING for the ECCS functions. ITS 3.5.2.7 exempts ECCS instrumentation from response time testing and allows using the design instrumentation response time in determining the ECCS RESPONSE TIME. The ECCS instrumentation was deleted based on the NEDO-32291-A, "System Analysis for Elimination of Selected Response Time Testing Requirements" results. zIs the justification consistent with the most recent NRC approval of the use of this topical report at Brunswick?			

BNP ITS 3.5.3 RCIC SYSTEM

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.3-1	JFD.9	CTS 4.7.4.b ITS SR 3.5.3.3	CTS 4.7.4.b requires verifying the RCIC System capable of developing required flow for a system head corresponding to a reactor pressure at operating pressure when steam is supplied at 1000 +20, -80 psig. ITS SR 3.5.3.3 changes the CTS requirements and requires verifying flow with reactor pressure with reactor pressure $\leq$ 1025 psig and $\geq$ 945 psig and steam supply pressure equal to the reactor pressure. The ITS changes the upper pressure limits from steam supply pressure of 1020 psig maximum to 1025 psig and the lower limit from 920 to 945 psig based on TSC 94TSB16 power uprate. The change to the pressure limits was based on a document not available for review.			The upper pressure limit change is accepted contingent on the NRC accepting the TSC 94TSB16 power uprate.
3.5.3-2	LD.1	CTS 4.7.4.c	CTS 4.7.4.c requires performing RCIC functional testing once per 18 months. ITS 3.5.3.4. and 3.5.3.5 requires RCIC testing once per 24 months. This is a change in the surveillance test interval.			GL 91-04 update, contingent on NRC acceptance during instrumentation review.

BNP ITS 3.5.3 RCIC SYSTEM

ITEM #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.5.3-3	L.2	CTS 4.7.4.c.1	CTS 4.7.4.c.1 requires verifying RCIC System operation in a functional test once per 18 months. ITS SR 3.5.3.5 changes the test to take credit for actual demands as functional tests. The justification does not demonstrate the methods that assure required parameters and verifications are obtained and performed.			

BNP ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-1	A.4 JFD 2 Bases JFD 3 Bases JFD 9	CTS 4.6.1.2 STS SR 3.6.1.1.1 ITS SR 3.6.1.1.1 and Associated Bases	CTS 4.6.1.2.1 requires leak rate testing in accordance with the Containment Leakage Rate Testing Program. STS SR 3.6.1.1.1 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 3.6.1.1.1 modifies STS SR 3.6.1.1.1 to conform to CTS 4.6.1.2.1. 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.	6/13/97		Licensee to update submittal with regards to 11/2/95 letter and updated TSTF 52 when OG provides revision or provide additional justification for deviations.

BNP ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-2	A.8 JFD 3	CTS 4.6.1.1.e.2 STS SR 3.6.1.1.2 ITS SR 3.6.1.1.2	CTS 4.6.2.1.e.2 requires conducting a drywell-to-suppression chamber bypass leak test at an initial differential pressure of 1 psig. STS SR 3.6.1.1.2 specifies an initial differential pressure of 1 psid. ITS SR 3.6.1.1.2 specifies an initial differential pressure range of $\geq$ 1.00 psid and $\leq$ 1.25 psid. The ITS addition of "and $\leq$ 1.25 psid" is considered a generic change and is beyond the scope of review for this conversion.	6/13/97		Delete this generic change.

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-3	M.1	CTS 3.6.1.2 ACTIONS CTS 3.6.1.4 ACTIONS CTS 3.6.2.1 ACTION c	CTS 3.6.1.2 ACTIONS, CTS 3.6.1.4 ACTIONS, and CTS 3.6.2.1 ACTION c prevent reactor operation above RCS temperature of 212° F, if containment leakage, containment structural integrity, and drywell to suppression chamber leakage are not within limits. M.1 states that the CTS ACTIONS would allow a startup and control rod withdrawal from cold shutdown (≤ 212° F) with Primary Containment structural integrity and leakage rates outside of limits. This M.1 statement implies that operation can continue above 212°F which is not true. See Item Number 3.6.1.1.4.	6/13/97		Modify M.1 to reflect the correct interpretation of the Action statements. See Item Number 3.6.1.1-4.

BNP ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-4	M.1	CTS 3.6.1.2 ACTIONS CTS 3.6.1.4 ACTIONS CTS 3.6.2.1 ACTION c ITS 3.6.1.1 ACTIONS	CTS 3.6.1.2 ACTIONS, CTS 3.6.1.4 ACTIONS, and CTS 3.6.2.1 ACTION c prevent reactor operation above a RCS temperature of 212° F if containment structural integrity and leakage rates are outside limits. M.1 states the following: "Should leakages above limits be discovered while operating, CTS ACTIONS are non-specific as to the appropriate action to take. Therefore, the appropriate action would be to declare Primary Containment integrity not met and take the ACTIONS of CTS 3.6.1.1." This is an incorrect statement. The appropriate action to take is CTS 3.0.3. Therefore ITS 3.6.1.1 ACTIONS are Less Restrictive than the CTS ACTIONS.	6/13/97		Provide additional discussion and justification for this Less Restrictive change.

BNP ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-5	Bases JFD 3	ITS B3.6.1.1 Bases- SR 3.6.1.1.1	ITS B3.6.1.1 Bases SR 3.6.1.1.1 has an insert (insert B 3.6.1.1-2) which specifies the exemptions to RG1.163 and NEI 94-01. Amendments 181 for Unit 1 and 213 for Unit 2 implement 10 CFR 50 Appendix J Option B at Brunswick. Insert B3.6.1.1-2 does not conform to (insert Item a) and contains additional exemptions (insert items b and c) not contained in the amendment TS changes, TS Bases changed, and associated staff safety evaluations. These changes may be beyond the scope of review items. See Item Number 3.6.1.1-1.	6/13/97		Revise the Bases discussion to conform to Amendment 181 and 213 Bases/Program discussions or provide additional discussion and justification to that these exemptions to the RG and NEI 94-01 were approved by the staff. See Item 3.6.1.1-1.

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-6	Bases JFD 7	STS B3.6.1.1 Bases-APPLICABLE SAFETY ANALYSES ITS B3.6.1.1 Bases APPLICABLE SAFETY ANALYSES	STS B3.6.1.1 Bases-APPLICABLE SAFETY ANALYSES states "Primary containment satisfies Criterion 3 of the NRC Policy Statement." ITS B3.6.1.1 Bases-APPLICABLE SAFETY ANALYSES changes this by deleting "NRC Policy Statement" and replacing it with "Reference 5." Ref. 5 is 10 CFR 50.36 (c)(2)(ii). A similar change is made in all other sections of ITS B3.6. This change is incorrect; the correct change should replace "NRC Policy Statement" with "10 CFR 50.36 (c)(2)(ii)". Reference 5 in the references may be retained if desired.	6/13/97		Revise the statement accordingly.

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-7	Bases JFD 8	STS B3.6.1.1 Bases- SR 3.6.1.1.1 ITS B3.6.1.1 Base SR 3.6.1.1.1	STS B 3.6.1.1 Bases - SR 3.6.1.1.1 states that failure to meet MSIV leakage (STS SR 3.6.1.3.13) does not necessarily result in a failure of STS SR 3.6.1.1.1. ITS B3.6.1.1 Bases- SR 3.6.1.1.1 deletes this item. However STS SR 3.6.1.3.13 is retained in the ITS as ITS SR 3.6.1.3.9. Therefore, the deletion is unacceptable.	6/13/97		Delete this change.

BNP ITS 3.6.1.2 PRIMARY CONTAINMENT AIR LOCK

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.2-1	A.4 JFD 2 JFD 3 Bases JFD 1 Bases JFD 3	CTS 4.6.1.3.b ITS SR 3.6.1.2.1 and Associated Bases	See Item Number 3.6.1.1-1	6/13/97		See Item Number 3.6.1.1-1
3.6.1.2-2	L.3	CTS 3.6.1.3 ACTION a.1 ITS 3.6.1.2 RA A.1	CTS 3.6.1.3, ACTION a.1 requires "maintaining" at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed. ITS 3.6.1.2 RA A.1 requires "verifying" the OPERABLE door is closed within 2 hours. The CTS does not require that the door is verified closed within 2 hours. The additional requirement to verify the OPERABLE door closed within 2 hours is a More Restrictive change.	6/13/97		Provide additional discussion and justification for this More Restrictive change.

BNP ITS 3.6.1.2 PRIMARY CONTAINMENT AIR LOCK

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.2-3	Bases JFD 1 Bases JFD 3	ITS B3.6.1.2 Bases-SR 3.6.1.2.1	ITS B3.6.1.2 Bases SR 3.6.1.2.1 has an insert (Insert B3.6.1.2-1) which specifies the exemption to RG 1.63 and NEI 94-01. Amendment 181 for Unit 1 and 213 for Unit 2 implements 10 CFR 50 Appendix J Option B at BNP. Insert B3.6.1.2-1 does not conform to the amendment TS changes, TS Bases changes, and associated staff safety evaluation. See Item Numbers 3.6.1.1-1 and 3.6.1.1-6.	6/13/97		Revise the Bases discussion to conform to Amendment 181 and 213 Bases/Program discussions. See Item Number 3.6.1.1-1 and 3.6.1.1-6.
3.6.1.2-4	Bases JFD 6	STS SR 3.6.1.2.2 and Associated Bases ITS SR 3.6.1.2.2 and Associated Bases	STS SR 3.6.1.2.2 requires verifying only one door in the air lock will open at a time at six month intervals. The interval is modified in the ITS SR 3.6.1.2.2 from 6 months to 24 months. This modification is in accordance with TSTF 17; however, the Bases changes are not in accordance with TSTF 17.	6/13/97		Licensee to update submittal to be in accordance with TSTF 17 or provide additional justification for the deviations.
3.6.1.2-5	Bases JFD 7	ITS B3.6.1.2 Bases APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6.	6/13/97		See Item Number 3.1.1-6.

BNP ITS 3.6.1.2 PRIMARY CONTAINMENT AIR LOCK

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.2-6	Bases JFD 9	STS B3.6.1.2 Bases ACTIONS ITS B3.6.1.2 Bases ACTIONS	STS B3.6.1.2 Bases-ACTIONS states the following: "The ability to open the OPERABLE door..." ITS B3.6.1.2 Bases-ACTIONS changes "ability" to "allowance". The justification cited is for typographical/grammatical errors. The staff does not believe this is a typographical/grammatical error.	6/13/97		Delete the change.
3.6.1.2-7	Bases JFD 9	STS B3.6.1.2 Bases-ACTIONS ITS B3.6.1.2 Bases ACTIONS	STS B3.6.1.2 Bases-ACTIONS states the following: "Pursuant to LCO 3.0.6, actions are not required..." ITS B3.6.1.2 Bases-ACTIONS capitalizes the word "Action". Based on the sentence, the word "action" in this case is not the defined term which would require capitalization.	6/13/97		Delete this change.

BNP ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-1	M.2 JFD 3 Bases JFD 8	STS SR 3.6.1.3.11 ITS SR 3.6.1.3.8 and Associated Bases	ITS SR 3.6.1.3.8 is a new SR that has been added to BNP ITS. The frequency for this SR is "In accordance with the Inservice Testing Program". STS SR 3.6.1.3.11 is the STS equivalent to ITS SR 3.6.1.3.8. The frequency for this SR is "18 months on a STAGGERED TEST BASIS." Inadequate justification is provided with regards to the changing of the SR frequency from "18 months on a STAGGERED TEST BASIS" to "In accordance with the IST Program." The staff cannot determine if the two frequencies are equivalent, or More Restrictive or Less Restrictive as compared to each other.	6/13/97		Provide additional discussion and justification on ITS SR 3.6.1.3.8 frequency deviation from the STS.

BNP ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-2	M.3 JFD 9 Bases JFD 8	CTS 3/4.4.7 CTS 3.6.1.2 CTS 3.6.3 ACTION a STS 3.6.1.3 ACTION D and Associated Bases ITS 3.6.1.3 ACTION D and Associated Bases	CTS 3.6.1.2 specifies the MSIV leakage limits and remedial actions to take upon discovery of leakage rates exceeding specified limits. CTS 3/4.4.7 provides additional operability requirements, remedial actions and associated times in which to complete the repairs and retests associated with an inoperable MSIV due to anything but leakage. The repair time per CTS 3/4.4.7 is 8 hours. ITS 3.6.1.3 Condition D changes STS 3.6.1.3 Condition D from "Secondary containment bypass leakage rate not within limit to "One or more penetration flow paths with MSIV leakage not within limits." Based on STS B 3.6.1.3 Bases RA D.1 discussion, STS 3.6.1.3 Condition D includes both secondary containment and MSIV leakage. Therefore, the proposed change to Condition D is acceptable. However, the change of the Completion Time	6/13/97		Delete this generic change. See Item Number 3.6.1.3-3.

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			associated with RA D.1 from 4 hours to an ITS time of 8 hours is not adequately justified. The justification used is consistency with the Completion Time of CTS 3.4.7 ACTION, CTS 3.6.3 ACTION a, and ITS 3.6.1.3 RA A.1. In addition this change in Completion Time is Less Restrictive than current licensing basis (See Item Number 3.6.1.3-3). The Completion Time associated with STS 3.6.1.3 RA D.1 takes into account the safety significance of containment leakage versus valve inoperability. Thus the STS Completion Time for leakage is less than the Completion Time for an inoperable MSIV. In addition, the staff finds this change to be generic and beyond the scope of review for a conversion.			
3.6.1.3-3	M.3	CTS 3.6.1.2 ACTIONS	See Item Numbers 3.6.1.1-3 and 3.6.1.1-4	6/13/97		See Item Numbers 3.6.1.1-3 and 3.6.1.1-4.
3.6.1.3-4	LD.3 JFD 2 Bases JFD 1 Bases JFD 3	CTS 4.6.1.2.2 ITS SR 3.6.1.3.9 and Associated Bases	See Item Number 3.6.1.1-1	6/13/97		See Item Number 3.6.1.1-1

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-5	JFD 7	STS 3.6.1.3 ACTIONS Note 4 ITS 3.6.1.3 ACTIONS Note 4	STS 3.6.1.3 ACTIONS Note 4 requires entering applicable Conditions and Required Actions of ITS 3.6.1.1, "Primary Containment," when PCIV leakage results in exceeding overall containment leakage rate acceptance criteria in MODES 1, 2, or 3. ITS 3.6.1.3 ACTIONS Note 4 deletes the Note applicability restriction of "in MODES 1, 2, or 3." The STS Note applicability restriction was added to clarify that the Note only applied in MODES 1, 2, and 3 and not to the full STS APPLICABILITY of MODES 1, 2, and 3 and "when associate instrumentation is required to be OPERABLE per LCO 3.3.6.1, which could include MODES 4 and 5. ITS 3.6.1.3 APPLICABILITY includes all STS APPLICABILITY. ITS LCO 3.3.6.1 "Primary Containment Isolation Instrumentation," adds a MODE 4 and 5 requirement to the RHR Shutdown Cooling System isolation valves. OPERABILITY of these valves precludes an inadvertent draindown of the reactor vessel through the shutdown cooling isolation valves and	6/13/97		Delete this generic change.

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			lowering reactor vessel level to the top of the fuel. Because of this, the Note clarification "In MODES 1, 2, or 3" needs to be retained. In addition, the wording of the justification (JFD 7) would make the change a generic change which is beyond the scope of review for this conversion.			
3.6.1.3-6	JFD 12 Bases JFD 8	STS SR 3.6.1.3.2 STS SR 3.6.1.3.15 and Associated Bases	STS SR 3.6.1.3.2 requires that each containment purge valve be verified closed on a 31 day frequency. STS SR 3.6.1.3.15 requires that certain containment purge valves be restricted or blocked from fully opening so that they can be closed automatically within the appropriate closure time. The ITS does not include these two SRs. The Bases for their deletion was a staff SER dated 9/18/84, which found the valves were demonstrated to be OPERABLE. However, ITS B3.6.1.3 Bases states that the purge valves are normally closed. Based on this statement it seems that STS SR 3.6.1.3.2 should be included and also possible SR 3.6.1.3.15.	6/13/97		Provide additional justification and discussion to show why these two STS SRs should not be included in the ITS.

BNP ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-7	JFD 15	STS 3.6.1.3 ACTION I ITS 3.6.1.3 ACTION F	STS 3.6.1.3 Condition I defines the acronym OPDRVs in Condition I. ITS 3.6.1.3 ACTION F removes the phrase "Operation with a potential for draining the reactor vessel (OPDRVs) from Condition F and places it in RA F.1 in place of "OPDRVs." The justification states that it is consistent with the format of the ITS and it is the first use of the term in NUREG-1433. The first use is in the Condition not the RA. The staff has determined that this is a generic change which is beyond the scope of review for this conversion.	6/13/97		Delete this generic change.
3.6.1.3.8	Bases JFD 6	ITS B3.6.1.3 Bases SR 3.6.1.3.3	ITS B 3.6.1.3 Bases SR 3.6.1.3.3 states that the SR may be performed by verification of absence of alarms. The justification (Bases JFD 6) is a general editorial justification which does not apply to this addition. The absence of alarms does not constitute a verification of continuity in the explosive charge particular if the alarm is inoperable. This also could be considered a generic change.	6/13/97		Provide additional discussion and justification for this change.

BNP ITS 3.6.1.3 PRIMARY C AINMENT ISOLATION VALVES (PCIVs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-9	Bases JFD 7	ITS B3.6.1.3 Bases APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6
3.6.1.3-10	None	CTS 3.6.3 ITS 3.6.1.3 Condition A Note ITS 3.6.1.3 Condition B Note and Associated Bases	ITS 3.6.1.3 Condition A and Condition B Note requires this Condition be applicable to penetration flow paths with two PCIVs. This requirement is not included in the CTS. There is no discussion or justification this administrative change.	6/13/97		Provide a discussion and justification for this administrative change.
3.6.1.3-11	None	CTS 3.6.3 Cond'tion C Note and Associated Bases	ITS 3.6.1.3 Condition C Note requires this Condition is applicable to penetration flow paths with one PCIV. This requirement is not included in the CTS. There is no discussion or justification for this administrative change.	6/13/97		Provide a discussion and justification for this administrative change.

BNP ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-12	None	CTS 4.6.1.1 *Note ITS 3.6.1.3 RA A.2 Note ITS 3.6.1.3 RA C.2 Note and Associated Bases.	CTS 4.6.1.1 *Note provides an exception for valves, blind flanges, and deactivated automatic valves which are located inside the containment, MSIV pit, RWCU Penetration Triangle room, or TIP Room and are locked, sealed, or otherwise secured in the closed position. ITS 3.6.1.3 RA A.2 Note and ITS 3.6.1.3 RA C.2 Note requires verifying isolation devices in high radiation areas by using administrative means. This note encompasses more than the *footnote valves. There is no justification for requiring this validation by administrative means.	6/13/97		Provide a discussion and justification for including the requirement of verification for isolation devices by administrative means.

BNP ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-13	None	ITS SR 3.6.1.3.9 and Associated Bases	The Bases for ITS SR 3.6.1.3.9 refers to a Note 1 while ITS SR 3.6.1.3.9 does not show a note. Therefore, the Bases discussion on the Note was deleted from the ITS. This is an error. The Note should be added to ITS SR 3.6.1.3.9 and the discussion retained in the Bases. This Note deals with leakage limit applicability and is associated with ITS 3.6.1.3 ACTIONS Note 4. Also, BWR 16 C.5 corrected this error. See Item Number 3.6.1.1-5 with regards to changes to this note.	6/13/97		Add Note to ITS 3.6.1.3.9 and retain Bases description of Note. Provide additional justification and discussion to support this change. See Item Number 3.6.1.1-5.

BNP STS 3.6.1.4 DRYWELL PRESSURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
S3.6.1.4-1	L.1 JFD 16 Bases JFD 12	CTS 3.6.1.5 STS 3.6.1.4 and Associated Bases	CTS 3.6.1.5 specifies the Primary Containment internal pressure limits. STS 3.6.1.4, Drywell Pressure, is deleted for the ITS. The ITS is renumbered such that ITS 3.6.1.4 is Drywell Air Temperature. The discussion and justification for deleting the primary containment internal pressure STS requirement does not address the current licensing basis, system design, or operational constraints. The justification is based on a recent GE evaluation on containment pressure. The justification used virtually the same words as Browns Ferry and Duane Arnold for deleting this requirement from their respective amendments. The justification references GE Report-NEDC - 32466P Supplement 1 and a BNP power uprate amendment. The topical report has not been reviewed and approved by	6/13/97		Provide justification for the STS deviation based on current licensing basis, system design, or operation constraints, or retain the STS 3.6.1.4 and Associated Bases.

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			the staff. Therefore, the justification based on this report would constitute a generic change to the STS and would be beyond the scope of review for a conversion.			

BNP ITS 3.6.1.4 DRYWELL AIR TEMPERATURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.4-1	JFD 16 Bases JFD 8	ITS 3.6.1.4 and Associated Bases	The renumbering of ITS 3.6.1.4 and succeeding specifications will depend on the resolution of Item Number S3.6.1.4-1.	6/13/97		See Item Number S3.6.1.4-1.
3.6.1.4-2	Bases JFD 6	STS B3.6.1.5 Bases- RA A.1 ITS B3.6.1.4 Bases RA A.1	STS B3.6.1.5 Bases RA A.1 states the following: "The 8 hour Completion Time is acceptable, considering the sensitivity of the analysis to variations in this parameter,..." ITS B3.6.1.4 Bases RA A.1 adds the words "Allow significant" between "to" and "variations" Bases JFD 6 is a clarity justification. The additional words changes the meaning of the sentence and restricts the variations. This would be considered a generic change.	6/13/97		Delete this generic change.
3.6.1.4-3	Bases JFD 7	ITS B3.6.1.4 Bases- APPLICABILITY SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6.

BNP ITS 3.6.1.5 REACTOR BUILDING-TO SUPPRESSION CHAMBER VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.5-1	A.2	CTS 3.6.4.2 ITS 3.6.1.5 ACTIONS Note	ITS 3.6.4.2 ACTIONS Note allows Separate Condition entry for each line. This allowance is not included in the CTS, nor is it implied in the CTS 3.6.4.2 ACTIONS as it is in CTS 3.6.3 "Primary Containment Isolation Valves." Also, the reference to L.2 is incorrect (See Item Number 3.6.1.5-2). Therefore, the justification is inadequate and incorrectly labeled for this Less Restrictive change.	6/13/97		Provide additional discussion and justification for this Less Restrictive change. See Item Number 3.6.1.5-2.

BNP ITS 3.6.1.5 REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.5-2	L.2	CTS 3.6.4.2 ACTION a. ITS 3.6.1.5 ACTION B	CTS 3.6.4 ACTION a specifies the actions to take with one Reactor Building-to-Suppression Chamber vacuum breaker inoperable for opening. If more than one vacuum breaker is inoperable for opening, CTS 3.0.3 would require a plant shutdown. Justification L.2 only addresses both vacuum breakers in a line inoperable (ITS 3.6.1.5 Action B). It does not cover the Less Restrictive change of more than 2 vacuum breakers inoperable which is also covered by ITS 3.6.1.5 ACTION B.	6/13/97		Provide additional discussion and justification for this Less Restrictive change.

BNP ITS 3.6.1.5 REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.5-3	JFD 9	STS SR 3.6.1.7.1 ITS SR 3.6.1.5.2	Due to the addition of plant specific SRs, STS SR 3.6.1.7.1 was changed to ITS SR 3.6.1.5.2. The number change is designated JFD 9. JFD 9 deals with MSIV leakage not reactor Building-To-Suppression Chamber Vacuum Breakers.	6/13/97		Correct this discrepancy.
3.6.1.5-4	JFD 16 Bases JFD 1 Bases JFD 8	ITS 3.6.1.5 and Associated Bases.	See Item Number 3.6.1.4-1	6/13/97		See Item Number 3.6.1.4-1.

BNP ITS 3.6.1.5 REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.5-5	JFD 29	CTS 4.6.4.2.1.b STS SR 3.6.1.7.3 ITS SR 3.6.1.5.4	CTS 4.6.4.2.1.b verifies the opening setpoint of the vacuum breakers to be ≤ 0.5 psid. STS SR 3.6.1.7.3 uses basically the same words: "Verify the opening setpoint of each vacuum break is ≤ 0.5 psid." ITS SR 3.6.1.5.4 changes the CTS and STS wording to say "Verify the full open setpoint of each vacuum breaker is ≤ 0.5 psid." This change changes the meaning and interpretation of the CTS to require the vacuum breaker to be fully open at 0.5 psid. Inadequate justification is provided for this change and the change could be considered generic.	6/13/97		Provide additional discussion and justification for this CTS change or delete the change.
3.6.1.5-6	Bases JFD 7	ITS B3.6.1.5 Bases APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6.

BNP ITS 3.6.1.5 REACTOR BUILDING-TO-SUPPRESSION CHAMBER VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.5-7	Bases JFD 13	STS B3.6.1.7 Bases APPLICABLE SAFETY ANALYSES ITS B3.6.1.5 Bases APPLICABLE SAFETY ANALYSES	STS B3.6.1.7 Bases-APPLICABLE SAFETY ANALYSES specifies the five cases that were considered in the safety analyses to determine the adequacy of the external vacuum breakers. ITS B3.6.1.5 Bases-APPLICABLE SAFETY ANALYSES deletes this information entirely. The justifications (Bases JFD 13) states that the appropriate analyses are in the UFSAR, and that the discussion in the Bases is not needed. This is incorrect. The discussion is needed in the Bases to provide a degree of understanding on how these technical concerns were addressed at BNP.	6/13/97		Either retain the STS wording, provide plant-specific wording, or appropriate plant specific references for each of the five STS cases or the plant-specific cases. Provide additional discussion and justification as necessary.

BNP ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-1	A.4	CTS 3.6.4.1 ACTION b ITS 3.6.1.6 ACTION B	CTS 3.6.4.1 ACTION b requires with one drywell-suppression chamber vacuum breaker in the open position, the provision of CTS 3.0.4 are not applicable and operation may continue under certain conditions. ITS 3.6.1.6 does not retain the requirement for CTS 3.0.4 not applicable. This change is classified as an Administrative change when in fact MODE changes are not allowed in MODES 1, 2, 3 when a vacuum breaker is open, per ITS 3.6.1.6 Action B. This is a More Restrictive change.	6/13/97		Provide discussion and justification for the More Restrictive change of not allowing MODE changes with a vacuum breaker open.

BNP ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-2	LA.1 L.7 JFD 23 Bases JFD 8	CTS 4.6.4.1.a STS SR 3.6.1.8.1 ITS SR 3.6.1.6.1 and Associated Bases	CTS 4.6.4.1.a requires demonstrating each drywell suppression chamber vacuum breaker is closed at least once per 14 days and "within 2 hours after any discharge of steam to the suppression chamber from any source." This second requirement is not retained in ITS SR 3.6.1.6.1 and is moved to plant procedures. STS SR 3.6.1.8.1 requires verifying each vacuum breaker closed (1) every 14 days, (2) within 2 hours after any discharge of steam to the suppression chamber from the safety/relief valves or (3) any operation that causes the drywell-to-suppression chamber differential pressure to be reduced by ≥ [0.5] psid. STS SR 3.6.1.8.1 covers all aspects of CTS 4.6.4.1.a as well as any other unexpected event which would reduce the differential pressure	6/13/97		Delete this generic change. Provide additional discussion and justification for the More Restrictive change for the additional conditions which would cause the vacuum breakers to open when the differential pressure ≥ 0.5 psid. See Item Number 3.6.1.6-4.

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			and open the vacuum breaker. Therefore the staff considers the proposed change/relocation as a generic change and beyond the scope of review for this conversion. See Item Number 3.6.1.6-4.			
3.6.1.6-3	JFD 16 Base JFD 8	ITS 3.6.1.6 and Associated Bases	See Item Number 3.6.1.4-1	6/13/97		See Item Number 3.6.1.4-1

BNP ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-4	JFD 21	CTS 4.6.4.1.d.1 STS SR 3.6.1.8.3 ITS SR 3.6.1.6.3	CTS 4.6.4.1.d.1 verifies the opening setpoint of the vacuum breakers from the closed position to be ≤ 0.5 psid. STS SR 3.6.1.8.3 uses basically the same words: "Verify the opening setpoint of each vacuum breaker is ≤ 0.5 psid." ITS SR 3.6.1.6.3 changes the CTS and STS wording to say "Verify the full open setpoint of each vacuum breaker is ≤ 0.5 psid." This change changes the meaning and interpretation of the CTS to require the vacuum breaker to be fully open at 0.5 psid. No adequate justification is provided for this change, and the change could be considered generic.	6/13/97		Provide additional discussion and justification for this CTS change or delete the change.

BNP ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-5	JFD 24 Bases JFD 8	CTS 4.6.4.1.b STS SR 3.6.1.8.2 ITS SR 3.6.1.6.2 and Associated Bases	CTS 4.6.4.1.b requires exercising each suppression chamber-to-drywell vacuum breaker through one complete cycle at least once per 31 days and after any discharge of steam to the suppression chamber from any source. STS SR 3.6.1.8.2 requires performing a functional test of each vacuum breaker (1) every 31 days, (2) within 12 hours after any discharge of steam to the suppression chamber from S/RVs, and (3) within 12 hours following an operation causing any of the vacuum breakers to open. The functional test is defined in the Bases as one complete cycle. ITS SR 3.6.1.6.2 requires performing a functional test of each vacuum breaker every 31 days, and within 12 hours after any discharge of steam	6/13/97		Delete this generic change. Provide additional discussion and justification for the More Restrictive change for the additional conditions which would cause the vacuum breakers to open. See Item Number 3.6.1.6.2.

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			to the suppression chamber from safety/relief valves. It deletes the third frequency. STS SR 3.6.1.8.2 covers all aspects of CTS 4.6.4.1.b as well as any other unexpected event which would open the vacuum breakers. The justification (JFD 24) refers to an internal staff memo dated 9/92. This memo was reviewed and factored into Rev. 1 of NUREG-1433 which was the basis for this conversion. Therefore, the staff considers the proposed change as a generic change and beyond the scope of review for this conversion. See Item Number 3.6.1.6-2.			

BNP ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6	Bases JFD 1 Bases JFD 6 Bases JFD 11	STS B3.6.1.8 Bases RA B.1 ITS B3.6.1.6 Bases RA B.1	STS B3.6.1.8 Bases-RA B.1 states the following: "An open vacuum breaker allows communication between the drywell and suppression chamber air space and, as a result, overpressurization due to..." ITS B3.6.1.6 Bases RA B.1 changes this statement to the following: "With one vacuum breaker not closed communication between...airspace could occur and, as a result,...for primary containment overpressurization due to..." The justification used were general type justifications for consistency, editorial clarity, plant specific nomenclature, etc. The staff has reviewed these changes and finds that the STS wording is correct and that the changes do not clarify, are not editorial and changes the intent of the Bases discussion.	6/13/97		Delete these changes.

BNP ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-7	Bases JFD 7	ITS B3.6.1.6 Bases-APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6

BNP ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-1	A.2 JFD 26 Bases JFD 8	CTS 3.6.2.1.a.2 ITS LCO 3.6.2.1.a ITS LCO 3.6.2.1.b and Associated Bases	CTS 3.6.2.1.a.2 requires a maximum average suppression chamber temperature of 95°F during OPERATION CONDITION 1 or 2. CTS 3.6.2.1.a.2.a requires a maximum average suppression chamber temperature of 105° during testing which adds heat to the suppression chamber. ITS 3.6.2.1.a requires suppression pool average temperature is ≤ 95°F with THERMAL POWER > 1% RTP and performing no testing that adds heat to the suppression pool. ITS 3.6.2.1.b requires suppression pool average temperature ≤ 105°F with THERMAL POWER > 1% RTP and testing that adds heat to the suppression pool. Adding a specific THERMAL POWER level limits to these CTS LCOs is a Less Restrictive change and was not discussed or justified. See Item Numbers 3.6.2.1-2, 3.6.2.1-3, 3.6.2.1-4.	6/13/97		Provide additional discussion and justification for this Less Restrictive change. See Item Numbers 3.6.2.1-2, 3.6.2.1-3, 3.6.2.1-4.

BNP ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-2	A.2 JFD 26 Bases JFD 8	CTS 3.6.2.1.a.2 STS LCO 3.6.2.1 STS B3.6.2.1 Bases-LCO ITS LCO 3.6.2.1. and Associated Bases	CTS 3.6.2.1.a.2 requires a maximum average suppression chamber temperature of 95°F during OPERATIONAL CONDITION 1 or 2. CTS 3.6.2.1.a.2.a requires a maximum average suppression chamber temperature of 105°F during testing which adds heat to the suppression chamber. CTS 3.6.2.1.a.2.b requires a maximum average suppression chamber temperature of 110°F with Thermal Power ≤ 1% RTP. STS 3.6.2.1.a requires a suppression pool average temperature be ≤ 95°F when any OPERABLE intermediate range monitor (IRM) channel is > 25/40 divisions of full scale on Range 7, while STS 3.6.2.1.b and c require a suppression pool average temperature be ≤ 105°F when any IRM channel is	6/13/97		Delete this generic change. See Item Numbers 3.6.2.1-1, 3.6.2.1-3, 3.6.2.1-4.

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			> 25/40 divisions on Range 7 and ≤ 110°F when all IRM channels are ≤ 25/40 divisions on Range 7. ITS 3.6.2.1 changes the IRM criteria to 1% RTP. Both STS B3.6.2.1 Bases-LCO and JFD 26 state that 1% RTP is not readily quantified with much accuracy. However, the Bases states that 25/40 divisions of full scale on IRM Range 7 is a convenient measure of when reactor is providing power essentially equivalent to 1% RTP. Since 1% RTP cannot be readily quantified with much accuracy the STS specifies an acceptable means to determine this. Therefore the staff finds ITS change unacceptable and generic. See Item Numbers 3.6.2.1-1, 3.6.2.1-3, and 3.6.2.1-4.			

BNP ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-3	A.2 JFD 26 Bases JFD 8	CTS 3.6.2.1 ACTION b and CTS 3.6.2.1 ACTION b.1 ITS 3.6.2.1 RA A.2 ITS 3.6.2.1 RA B.1 and Associated Bases	CTS 3.6.2.1 ACTION b and ACTION b.1 require restoring the suppression pool average temperature to less than or equal to 95°F within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. ITS 3.6.2.1 RA A.2 requires restoring suppression pool average temperature to ≤95°F in 24 hours and ITS 3.6.2.1 Required Action B.1 reduces THERMAL POWER to ≤1% RTP in 12 hours. There is inadequate justification for this less Restrictive change of changing the CTS Completion Time from COLD SHUTDOWN in 36 hours to THERMAL POWER ≤1% RTP in 12 hours. See Item Number 3.6.2.1-1, 3.6.2.1-2, and 3.6.2.1-4.	6/13/97		Provide additional discussion and justification for this Less Restrictive change. See Item Numbers 3.6.2.1-1, 3.6.2.1-2, and 3.6.2.1-4.

BAP ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-4	A.2	CTS 4.6.2.1.b	CTS 4.6.2.1.b requires verifying the suppression chamber average water temperature at least once per 24 hours in OPERATIONAL CONDITION 1 or 2 be less than or equal to 95°F. ITS SR 3.6.2.1.1 requires verifying suppression pool average temperature within applicable limits every 24 hours. There is no justification for the More Restrictive change of removing the CTS applicability requirement for OPERATIONAL CONDITION 1 or 2 to MODES 1, 2, and 3.	6/13/97		Provide additional discussion and justification for this More Restrictive change. See Item Numbers 3.6.2.1-1, 3.6.2.1-2, and 3.6.2.1-3.

BNP ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-5	L.2	CTS 4.6.2.1.c	CTS 4.6.2.1.c requires performing an external visual examination of the suppression chamber enclosure emergency core cooling system suction line penetrations prior to taking the reactor from COLD SHUTDOWN following safety/relief valve (SRV) operation with the suppression chamber water temperature greater than or equal to 160°F and reactor coolant system pressure greater than 200 psig. This requirement is not retained in ITS 3.6.2.1. However, based on the discussion in L.2, this requirement seems to be plant specific and part of the current licensing basis for BNP. Changes to this requirement are therefore considered to be beyond the scope of review for this conversion.	6/13/97		Update the ITS to include this requirement.
3.6.2.1-6	Bases JFD 7	ITS B3.6.2.1 Bases APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6.

BNP ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-7	Bases JFD 16	STS B3.6.2.1 Bases BACKGROUND ITS B3.6.2.1 BASES-BACKGROUND	STS B3.6.2.1 Bases-BACKGROUND specified the technical concerns that lead to the development of the suppression pool average temperature limits. ITS B3.6.2.1 Bases-BACKGROUND deletes the technical justifications for the specific items listed in STS B3.6.2.1. The justification (Bases JFD 16) states that the appropriate analyses are in the UFSAR and that the discussion in the Bases is not needed. This is incorrect. The discussion is needed in the Bases to provide a degree of understanding on how these technical concerns were addressed at BNP.	6/13/97		Either retain the STS wording, provide plant-specific wording, or appropriate plant-specific references for each of these technical concerns. Provide additional discussion and justification as necessary.

BNP ITS 3.6.2.2 SUPPRESSION POOL WATER LEVEL

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.2-1	La.1 JFD 3 Bases JFD 5	CTS 3.6.2.1.a.1 ITS LCO 3.6.2.2 and Associated Bases	CTS 3.6.2.1.a.1 specifies the suppression pool water level volume and level. The level limits are retained in ITS LCO 3.6.2.2, however, the volume limits are relocated to the Bases. The volume limits in CTS 3.6.2.1.a.1 have been changed in the markup. The changes are justified in BNP Technical Specification change request 967SB07 which has not been submitted to or reviewed by the staff. This Less Restrictive change is a beyond scope of review for this conversion.	6/13/97		Delete this change.
3.6.2.2-2	Base JFD 7	ITS B3.6.2.2 Bases- APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6

BNP ITS 3.6.2.3 RESIDUAL HEAT REMOVAL (RHR) SUPPRESSION POOL COOLING

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.3-1	Bases JFD 7	ITS B.3.6.2.3 APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6.	6/13/97		See Item Number 3.6.1.1-6.
3.6.2.3-2	Bases JFD 9	STS B3.6.2.3 Bases RA A.1 ITS B3.6.2.3 Bases RA A.1	STS B3.6.2.3 Bases RA A.1 states the following: "In this Condition, the..." ITS B3.6.2.3 Bases RA A.1 decapitalizes the "C" in "Condition". The justification is typographical/grammatical. This is incorrect. The STS is correct since the sentence is talking about Condition A.	6/13/97		Delete this change.

BNP STS 3.6.3.2 DRYWELL COOLING SYSTEM FANS

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
S3.6.3.2-1	JFD 32 Bases JFD 12	STS 3.6.3.2 and Associated Bases	STS 3.6.3.2 specifies the requirements and surveillances for Drywell Cooling System Fans. The ITS does not contain this specification. The justification (JFD 32) used states BNP does not assume Drywell Cooling System Fans are available to assure adequate mixing. STS B3.6.3.2 Bases APPLICABLE SAFETY ANALYSES states that even though no credit for mechanical mixing is assumed in the analysis, the system does meet criterion 3 or 10 CFR 50.36 (c)(2)(ii), for other reasons.	6/13/97		Provide additional discussion and justification for this deletion based on current licensing Bases, system design or operational constraints.

BNP ITS 3.6.3.1 PRIMARY CONTAINMENT OXYGEN CONCENTRATION

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3.1-1	JFD 1 Bases JFD 8	CTS 3.6.6.3.b STS 3.6.2.3 APPLICABILITY b. and Associated Bases ITS 3.6.2.3 APPLICABILITY b and Associated Bases	STS 3.6.2.3 APPLICABILITY b is 24 hours prior to reducing THERMAL POWER to < 15% RTP prior to the next scheduled reactor SHUTDOWN. CTS 3.6.6.3.b and ITS 3.6.2.3 APPLICABILITY b is 24 hours prior to a scheduled reduction of THERMAL POWER to < 15% RTP. All three seem to say the same thing. There is inadequate justification for deviating from the STS APPLICABILITY.	6/13/97		Provide additional discussion justification for the STS deviation Based on current licensing Basis, system design or operational constraints.
3.6.3.1-2	JFD 32 Bases JFD 8	ITS 3.6.3.1 and Associated Bases	The renumbering of ITS 3.6.3.1 and succeeding specifications will depend on the resolution of Item Number S3.6.3.2-1.	6/13/97		See Item Number S3.6.3.2-1.
3.6.3.1-3	Bases JFD 7	ITS B3.6.3.1 Bases APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6.

BNP ITS 3.6.3.1 PRIMARY CONTAINMENT OXYGEN CONCENTRATION

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3.1-4	Bases JFD 8	STS B3.6.3.3 Bases-BACKGROUND ITS B3.6.3.1 Bases BACKGROUND	STS B3.6.3.3 Bases-BACKGROUND specifies other STS which provide redundant and diverse methods to mitigate events that produce hydrogen. ITS B3.6.3.1 Bases-BACKGROUND deletes these STS references. This is incorrect. Resolution of this item is dependent on resolution of Item Number S3.6.3.2-1.	6/13/97		See Item Number S3.6.3.2-1.

BNP STS 3.6.3.4 CONTAINMENT ATMOSPHERE DILUTION (CAD) SYSTEM

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
S3.6.3.4-1	R.1 JFD 33 Bases JFD 12	CTS 3/4.6.6.2 STS 3.6.3.4 and Associated Bases	CTS 3/4.6.6.2 specifies that requirements and surveillances for the Containment Atmosphere Dilution System. STS 3.6.3.4 is deleted from the ITS. STS B3.6.3.4 Bases-APPLICABLE SAFETY ANALYSIS states that the CAD system meets Criterion 3 of the Policy Statement/10 CFR 50.36 (c)(2)(ii). No detailed justification is provided to show that the CAD System at BNP does not meet 10 CFR 50.36 (c)(2)(ii). In addition, a NEDO report is referenced as part of the justifications (NEDO-22155) which does not seem to have been reviewed and approved by the staff. Based on the above, the staff considers this change to be generic and beyond the scope of review for this conversion.	6/13/97		Delete this generic change.
S3.6.3.4-2	None	STS 3.6.3.4	See Item Number 3.6.3.1-2	6/13/97		See Item Number 3.6.3.1-2.

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.1-1	LA.1 JFD 34 Bases JFD 8	CTS 1.0 STS SR 3.6.4.1.1 STS SR 3.6.4.1.2 STS SR 3.6.4.1.3 and Associated Bases	CTS 1.0 DEFINITIONS defines secondary containment integrity/OPERABILITY. BNP current licensing basis requires, based on this definition, that the OPERABILITY of secondary containment be verified on a periodic basis. Even though the details of the definition can be relocated to the Bases, the requirements need to remain in the TS, as was similarly done for primary containment. STS SRs 3.6.4.1.1, through 3.6.4.1.3 specify these definition requirements and their surveillance frequencies.	6/13/97		Include STS SRs 3.6.4.1.1 through 3.6.4.1.3 and their Associated Bases in ITS 3.6.4.1, and renumber succeeding SRs accordingly.
3.6.4.1-2	Bases JFD 7	ITS B3.6.4.1 Bases-APPLICABLE SAFETY ANALYSIS	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6.

BNP ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION DAMPERS (SCIDs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-1	JFD 1 Bases JFD 8	STS 3.6.4.2 RA A.2 ITS 3.6.4.2 RA A.2 and Associated Bases	STS 3.6.4.2 RA A.2 requires verifying the affected penetration flow path is isolated once per 31 days. ITS 3.6.4.2 RA A.2 requires verifying the affected penetration flow path is isolated once per 92 days. The justification (JFD 1) used states that the change is consistent with current licensing basis. The CTS does not have an ACTION statement verifying the dampers are closed on a specified frequency, nor is there a surveillance verifying the dampers are closed. Thus, there is inadequate justification for this Less Restrictive change of extending the STS Completion Time from 31 days to 92 days, in the ITS.	6/13/97		Provide additional discussion and justification for the Less Restrictive change STS deviation based on current licensing basis, system design, or operational constraints.

BNP ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION DAMPERS (SCIDs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-2	JFD 21	STS SR 3.6.4.2.2 and Associated Bases ITS SR 3.6.4.2.1 and Associated Bases.	STS SR 3.6.4.2.2 verifies "The isolation time of each power operated and each automatic SCIV is within limits." ITS SR 3.6.4.2.1 deletes the words "each power operated and" from the STS SR. This change in the SR and Associated Bases are not in accordance with TSTF-46 Rev. 1.	6/13/97		Licensee to update submittal with regards to TSTF-46 Rev. 1 or provide additional justification for the deviations.

BNP ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION DAMPERS (SCIDs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-3	JFD 36 JFD 37 Bases JFD 8	STS SR 3.6.4.2.1 and Associated Bases ITS B3.6.4.2 Bases-BACKGROUND ITS B3.6.4.2 Bases-LCO	STS SR 3.6.4.2.1 verifies that each secondary containment isolation manual valve and blind flange that is required to be closed during accident conditions is closed on a 31 day frequency. The ITS deletes this SR and the reference to manual valves and blind flanges in STS B3.6.4.2 Bases-BACKGROUND and LCO Sections based on the premise that these items are not in the current licensing basis. However, CTS change L.3 for ITS 3.6.4.2 RA A.1 and RA B.2 allows penetrations to be isolated using blind flanges. If blind flanges are used in the ITS RAs, then it can be assumed that they are permanently installed. Therefore, STS SR 3.6.4.2.1 should be included in ITS 3.6.4.2. Also JFD 37 has nothing to do with these changes.	6/13/97		Include STS SR 3.6.4.2.1 and the references to manual valves and blind flanges in STS B3.6.4.2 Bases-BACKGROUND and LCO Sections in ITS 3.6.4.2 and ITS B3.6.4.2 Bases or provide additional discussion and justification as to why it should not be included. Correct the discrepancies.

BNP ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION DAMPERS (SCIDs)

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-4	Bases JF 7	ITS B3.6.4.2 Bases- APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6	6/13/97		See Item Number 3.6.1.1-6
3.6.4.2-5	None	CTS 3.6.5.2 ACTION	CTS 3.6.5.2 ACTION requires with one or more secondary containment isolation dampers inoperable, operation my continue and the provisions of CTS 3.0.4 are not applicable, provided at least one isolation damper is maintained OPERABLE in each affected penetration that is open. ITS 3.6.4.2 does not address CTS 3.0.4 as not applicable. A justification was not provided for the administrative change of removing the requirement that CTS 3.0.4 is not applicable.	6/13/97		Provide discussion and justification for this Administrative change.

BNP ITS 3.6.4.3 STANDBY GAS TREATMENT (SGT) SYSTEM

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-1	A.3 Bases JFD 5	CTS 4.6.6.1.a STS B3.6.4.3 Bases-SR 3.6.4.3.1 ITS B3.6.4.3 Bases-SR 3.6.4.3.1	CTS 4.6.6.1.a operates the SGT sub-systems for ≥ 10 hours with the heaters on automatic control. STS B3.6.4.3 Bases-SR 3.6.4.3.1 states that operation with the heaters on (automatic heater cycling to maintain temperature) for ≥ 10 continuous hours eliminates moisture on the adsorbers and HEPA filters. ITS B3.6.4.3 Bases-SR 3.6.4.3.1 deletes the requirement for automatic heater cycling to maintain temperature. Justification A.2 states that no change in actual operating practice or, the CTS requirement is intended. However the Bases changes could be interpreted that automatic control is not required for this SR.	6/13/97		Delete this change and provide additional discussion and justification for the relocation of the automatic control requirement to the Bases.

BNP ITS 3.6.4.3 STANDBY GAS TREATMENT (SGT) SYSTEM

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-2	JFD 38 Bases JFD 8	CTS 3.6.6.1 ACTION b.1 STS 3.6.4.3 ACTION D and Associated Bases ITS 3.6.4.3 ACTION B. and Associated Bases	CTS 3.6.6.1 ACTION b.1 requires a shutdown within 36 hours with two SGT subsystem inoperable in MODES 1, 2, or 3. ITS 3.6.4.3 ACTION B also requires a shutdown within 36 hours with two SGT subsystems inoperable in MODES 1, 2, or 3. STS 3.6.4.3 ACTION D requires entry into STS/ITS LCO 3.0.3 with two SGT subsystems inoperable. STS 3.6.4.3 ACTION D was deleted from the ITS. STS/LCO 3.0.3 requires a shutdown within 37 hours. The CTS is more restrictive than the STS.	6/13/97		Even though the CTS is More Restrictive than the STS and is acceptable, provide any additional discussion and justification other than current licensing basis as to why the slightly more lenient STS requirement was not used.

BNP ITS 3.6.4.3 STANDBY GAS TREATMENT (SGT) SYSTEM

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-3	Bases JFD 1	CTS 4.6.6.1.b CTS 4.6.6.1.c STS B3.6.4.3 Bases SR 3.6.4.3.2 ITS B3.6.4.3 Bases SR 3.6.4.3.2 ITS B3.6.4.3 Bases REFEREMCES	STS B3.6.4.3 Bases-SR 3.6.4.3.2 states that "The...filter tests are in accordance with Regulatory Guide (RG) 1.52) (Ref.3)." ITS B3.6.4.3 Bases-SR 3.6.4.3.2 deletes this statement and Ref. 3 from ITS B3.6.4.3 Bases-REFERENCE Section. The Bases for this deletion is the general plant-specific nomenclature, etc., justification. ITS 5.5.7 states that the VFTP test shall be done in accordance with R.G. 1.52, Rev. 1. Also CTS 4.6.6.1.b and 4.6.6.1.c also reference RG 1.5.2 Rev. 1. Therefore, the justification Bases JFD 1 is wrong, and the STS statement and Reference 3 should be reinserted into ITS B3.6.4.3.2 Bases SR 3.6.4.3.2 and ITS B3.6.4.3 Bases-REFERENCES, respectively. Furthermore, the staff would consider this change as a generic change.	6/13/97		Reinsert the STS statement and reference to RG 1.52 in the appropriate place in ITS B3.6.4.3 Bases-SR 3.6.4.3.2 and ITS B3.6.4.3 Bases-REFERENCES.

BNP ITS 3.6.4.3 STANDBY GAS TREATMENT (SGT) SYSTEM

ITEM NO.	DOC/ JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3	Bases JFD 7	ITS B3.6.4.3 Bases APPLICABLE SAFETY ANALYSES	See Item Number 3.6.1.1-6.	6/13/97		See Item Number 3.6.1.1-6.

BNP ITS 3.7.1 RESIDUAL HEAT REMOVAL SERVICE WATER (RHRSW) SYSTEM

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.1-1	JFD1	CTS 3.7.1.1 Action b, STS LCO 3.7.1 Action B	CTS 3.7.1.1 Action b and ITS Action B allows Mode changes with one inoperable RHRSW subsystem. Since two RHRSW pumps are need for a subsystem to be operable (achieve 100% flow) and each subsystem has only two pumps, exempting LCO 3.0.4 for Condition B seems hard to justify. Exempting LCO 3.0.4 for Condition A, in which one pump is inoperable, is only slightly more understandable. In both instances the ITS (and CTS) are not in conformance with the STS. Are these conditions at all addressed and justified by a risk-based analysis (such as GENE-B2100565-09, Technical Specification Improvements to the Emergency Core Cooling System for the Carolina Power and Light Brunswick Steam Electric Station Units 1 and 2, Revision 1, October 1996). Insert to Bases, B 3.7.1-3, on redundant capabilities of the operable subsystem, appears to be incorrect.	5/26/97		Discuss and justify the LCO 3.0.4 exemptions for Conditions A and B.
BNP RESPONSE						

BNP ITS 3.7.2 SERVICE WATER (SW) AND ULTIMATE HEAT SINK (UHS)

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.2-1	L.1 JD6	CTS 3.7.1.2.a	The ACTIONS contained in CTS 3.7.1.2.a.1.a, CTS 3.7.1.2.a.2.a, CTS 3.7.1.2.a.4.a, and CTS 3.7.1.2.a.4.b are not included in ITS 3.7.2. ITS 3.7.2 extends the 72 hour Completion Time for CTS 3.7.1.2.a.2.b and CTS 3.7.1.2.a.4.c to 7 days. These changes are based on SW System hydraulic analyses documented in PCN G0050A-10, "BSEP Unit No. 1 Service Water System Hydraulic Analysis," Rev. 6, 07/29/93, and PCN G0050A-12, "BSEP Unit No. 2 Service Water System Hydraulic Analysis," Rev. 5, 08/11/92. These issues are the subject of TS Amendments 164 (Unit 1) and 195 (Unit 2).	5/26/97		These changes to the CTS ACTIONS are based on licensee amendment requests. Accepting these changes is contingent on accepting the TS License Amendment requests. Extending these CTS Completion Times are outside the scope of the STS conversion review. These changes are <u>not</u> consistent with the STS.
BNP RESPONSE						
3.7.2-2	LD.1	CTS 4.7.1.2.b	CTS 4.7.1.2.b specifies verifying that automatic components servicing safety-related components actuate to the correct position every 18 months. ITS SR 3.7.2.5 extends this Surveillance Frequency to 24 months.	5/26/97		This extension of the CTS Surveillance Test Interval is based upon NRC review of BNP change from 18 to 24 month refueling cycle; pending.
BNP RESPONSE						

BNP ITS 3.7.2 SERVICE WATER (SW) AND ULTIMATE HEAT SINK (UHS)

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.2-3	LA.3	CTS 4.7.1.2.b	CTS 4.7.1.2.b requires verifying automatic components during shutdown. ITS SR 3.7.2.5 does not include the words "during shutdown;" this requirement is moved to plant procedures in accordance with the guidance of Generic Letter 91-04. The justification provided states that the plant procedure will be controlled via the 10 CFR 50.59 process.	5/26/97		Provide the document (TRM) that will contain this plant procedure, that is to be incorporated into the UFSAR and controlled the 50.59 process.
BNP RESPONSE						
3.7.2-4	JFD7	ITS 3.7.2 Conditions F & G	The UHS temperature condition is new to both the CTS and STS, and justified "plant specific analyses." Condition F lists required actions if the temp is between 89° and 92°. If the temp rises above 92° the intent apparently is to enter Condition G, however, at above 92° Condition F is not violated.	5/26/97		Condition G should include an explicit statement, "With UHS water temperature >92°."
BNP RESPONSE						

BNP ITS 3.7.3 CONTROL ROOM EMERGENCY VENTILATION (CREV) SYSTEM

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.3-1	L.2 JFD11 JFD12 JFD13	CTS 3.7.2.a CTS 3.7.2.b CTS 3.7.2.c	CTS 3.7.2., 3.7.2.b, and 3.7.2.c, require a plant shutdown if the CTS requirements are not met. ITS 3.7.3.B has been added to the STS which allows continued plant operation for 92 days if the Chlorine Protection Mode is initiated within 1 hour. This is an extension of the CTS (and STS) Completion Time of 7 days.	5/26/97		This extension of CTS Completion Time is beyond the scope of the STS conversion review. The NRC staff is reviewing the change.
BNP RESPONSE						
3.7.3-2	LD.1	CTS 4.7.2.d.2	CTS 4.7.2.d.2 requires testing the CREV diverts its inlet flow through the HEPA filter and charcoal adsorber banks upon initiation of a CREV high radiation test signal at least once per 18 months. ITS SR 3.7.3.4 requires this testing at least once every 24 months. This is an extension of the CTS Refueling Surveillance Test Interval.	5/26/97		This extension of CTS Refueling Surveillance Test Interval is under NRC staff review.
BNP RESPONSE						

BNP ITS 3.7.3 CONTROL ROOM EMERGENCY VENTILATION (CREV) SYSTEM

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.3-3	R.1	CTS 3/4.7.2	CTS 3/4.7.2 includes Required Actions and Surveillance Requirements for the Smoke Protection and Chlorine Protection Modes of the CREV. The ITS relocates these requirements to "a" Technical Requirements manual.	5/26/97		Is the TRM a specific document? Provide additional discussion listing the licensee controlled document containing this requirement.
BNP RESPONSE						

BNP ITS 3.7.4 CONTROL ROOM AIR CONDITIONING (AC) SYSTEM

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No comments on this section.			

BNP ITS 3.7.5 MAIN CONDENSER OFFGAS

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No comments on this section.			

BNP ITS 3.7.6 MAIN TURBINE BYPASS SYSTEM

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.7.6-1	JFD 17	STS 3.7.6 ACTION A	ITS 3.7.6 adds STS 3.7.6 ACTION A. STS 3.7.6 Action A specifies a COMPLETION TIME of 2 hours. ITS 3.7.6 ACTION A revises the COMPLETION TIME to 4 hours. Having a CT that is more limiting than the APLHGR and MCPR CTs is not wrong or necessarily illogical. This is an extension of the STS COMPLETION TIME that lacks adequate justification.	5/26/97		Retain STS CT of 2 hours or, provide additional justification for this CT extension based on operational limits or plant design.
BNP RESPONSE						

BNP ITS 3.7.7 SPENT FUEL STORAGE POOL WATER LEVEL

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No comments on this section.			

BSEP ITS 3.9.1 REFUELING EQUIPMENT INTERLOCKS

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.9.1-1	JFD 1 A.5	CTS 3.9.1	A clarifying phrase has been added to the STS LCO and Applicability; that the interlocks are only those "associated with the refuel position of the reactor mode switch," consistent with the current licensing basis. This is added to eliminate confusion that exists in the STS.	5/30/97		Submit a TSTF change request. Approval of addition is pending the approval of TSTF change.
BNP RESPONSE						

BSEP ITS 3.9.2 REFUEL POSITION ONE-ROD-OUT INTERLOCK

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Comments on this Section.			

BNP ITS 3.9.3 REFUELING OPERATIONS CONTROL RODS POSITION

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Comments on this Section.			

BSEP ITS 3.9.4 REFUELING OPERATIONS CONTROL ROD POSITION INDICATION

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Comments on this Section.			

BNP ITS 3.9.5 REFUELING OPERATIONS CONTROL ROD OPERABILITY - REFUELING

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.9.5-1	LC.1	CTS 4.1.-3.5.b	CTS SR 4.1.3.5.b requires a Channel Functional Test of leak detectors and Channel Calibration of pressure detectors at least once per 18 months. The ITS does not include these requirements. The CTS requirements are moved to unspecified plant procedures.	5/30/97		Provide discussion and justification identifying the plant procedures that includes the CTS requirements.
BNP RESPONSE						

BNP ITS 3.9.6 REFUELING OPERATIONS REACTOR PRESSURE VESSEL (RPV) WATER LEVEL

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Comments on this Section.			

BNP ITS 3.9.7 REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - HIGH WATER LEVEL

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Comments on this Section.			

BNP ITS 3.9.8 REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - LOW WATER LEVEL

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Comments on this Section.			

BNP ITS 3.9.9 WATER LEVEL - SPENT FUEL STORAGE POOL

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Comments on this Section.			

BNP ITS 3.10.1 INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.1-1	L.1	CTS Table 1.2 STS 3.10.1	No CTS requirements are provided for review comparable to the Inservice Leak and Hydrostatic Testing Operation requirements of STS 3.10.1. 1) How are test exceptions for inservice or hydrostatic tests presently handled? 2) Are the analyses discussed in L.1 part of the licensing basis or previously reviewed by the NRC?			

BNP ITS 3.10.2 REACTOR MODE SWITCH INTERLOCK TESTING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.2-1	JFD 10	STS Bases SR 3.10.-7.1 and ITS SR 3.1-0.2.1 & .2	If being technically qualified is not to be defined by the discussion in the STS basis, what makes a person "technically qualified" - ANSI? The CTS use the term but does not define it either. What is the present standard?			
3.10.2-2	None	ITS 3.10.2 Bases Applicability	The intent of the addition "... or testing that must be performed prior to entering another MODE" is unclear given that all the discussion that follows it is about interlock testing.			
3.10.2-3	M.1	CTS Table 1.2	CTS Table 1.2 does not contain requirements equivalent to the Required Actions, associated Completion Times or Surveillance Requirements of ITS 3.10.2. The justification is based on that the requirements are not included in the CTS and that they are added to the ITS making the change More Restrictive. The justification does not contain discussion which provides why the added actions are appropriate or adequate to accomplish the intended purpose.			

BNP ITS 3.10.3 SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.3-1	M.1	CTS Table 1.2	CTS Table 1.2, Footnote ***, allows placing the reactor mode switch in the Refuel position while moving a single control rod providing the one-rod-out interlock is OPERABLE. Under the same conditions, ITS 3.10.3 allows placing the reactor mode switch in the Refuel position while moving a single control rod providing the requirements of ITS 3.9.2, One-Rod-Out Interlock, are met. ITS 3.10.3 also applies the additional restrictions of ensuring all other control rods are fully inserted; meeting the requirements of ITS 3.9.4 and; either meeting the requirements of ITS 3.3.1.1, 3.3.8.2 and 3.9.5 or ensuring all rods within a 5 by 5 array are disarmed. The justification does address why added requirements are appropriate or adequate to ensure the additional safety margin sought during single rod withdrawal.			

BNP ITS 3.10.4 SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN

ISSUE #	DOC OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.4-1	L.2	CTS 3.9.10.1	CTS 3.9.10.1 does not contain requirements equivalent to ITS 3.10.4.b.2, ITS 3.10.4.c.1, ITS SR 3.10.4.1 or ITS SR 3.10.4.4. The justification identifies the added ITS requirements but does not indicate why adding these new requirements are less restrictive. Additionally, while L.2 explains what the new requirements are designed to accomplish, the discussion does not address why, even though they are less than what was in CTS, they are in fact adequate.			
3.10.4-2	L.2	CTS 3.9.10.1	CTS 3.9.10.1.c requires the CTS 3.1.1 SDM requirements satisfied PRIOR to the removing the control rod. ITS 3.10.4.c.2 allows that if the control rods in a five by five array are disarmed, SDM MODE 4 requirements are changed to allow assuming the single control rod to have the highest worth. The ITS 3.10.4.c.2 requirement is not equivalent to the CTS 3.9.10.1.c (and or 3.9.10.d) requirement. No discussion or justification is provided for deleting the CTS requirement for satisfying the SDM requirements.			

BNP ITS 3.10.4 SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN

ISSUE #	DOC OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.4-3	None	CTS 3.9.10.4 ACTION	CTS 3.9.10.1 specifies the requirements of CTS 3.0.3 are not applicable. ITS 3.10.4 does not contain this exception. No discussion or justification is provided for this deleted CTS requirement.			
3.10.4-4	None	CTS 4.9.10.1 .c	CTS 4.9.10.1.c requires verifying the CTS 3.1.1 SDM requirements at least every 24 hours and CTS 3.9.10.1 requires that the SDM of CTS 3.1.1 be satisfied prior to the removal of the control rod. Neither ITS 3.10.4.c.2 nor ITS 3.10.4.1 appear to require SDM of ITS 3.1.1 to be done prior to removal of the control rod or at any other interval associated with this LCO. (contrary to the discussion in L.3).			

BNP ITS 3.10.5 SINGLE CONTROL ROD DRIVE (CRD) REMOVAL - REFUELING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.5-1	L.1 M.1	CTS 3.9.10.1.a	Both Discussion of Change M.1 and L.1 state the one-rod-out interlock is inoperable under ITS 3.10.5 conditions and the interlock requirement is replaced by the ITS 3.10.5.c requirement to insert a control rod withdrawal block. DOC L.1 justifies removal of the one-rod-out interlock and M.1 justifies inserting the rod withdrawal block requirement. Both state that the actions taken "compensate" for the inoperable one-rod-out interlock. If both compensate for the interlock how can one be more restrictive and one less restrictive? Unlike M.1, L.1 does not even try to justify why it less restrictive.			
3.10.5-2	None	CTS 3.9.10.1.c	CTS 3.9.10.1.c states the SDM requirements of CTS 3.1.1 must be satisfied prior to the removal of the control rod. ITS 3.10.5.c requires inserting a rod block and changing the SDM MODE 5 requirements allowing the single control rod assumed to be the highest worth. The ITS 3.10.5.c requirement is not the same as the CTS 3.9.10.1.c requirement. No discussion or justification is provided for this deleted CTS requirement.			

BNP ITS 3.10.5 SINGLE CONTROL ROD DRIVE (CRD) REMOVAL - REFUELING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.5-3	None	CTS 3.9.10.1.d	CTS 3.9.10.1.d requires all other control rods in a five by five array centered on the control rod being removed are fully inserted and disarmed. ITS 3.10.5.b requires all other control rods in a five by five array centered on the control rod being withdrawn are disarmed The ITS 3.10.5 requirement does not require inserting the control rods and is not the same as the CTS 3.9.10.1.d requirement. No discussion or justification is provided for the changed CTS requirement.			
3.10.5-4	A.4	CTS 3.9.10.1.e	CTS 3.9.10.1.e requires inserting all other control rods or removing the surrounding four fuel assemblies. ITS 3.10.5 allows for only inserting all other control rods. Isn't his a more restrictive requirement and why is it necessary/justified?			
3.10.5-5	A.5	CTS 3.9.10.1	CTS 3.9.10.1 Applicability is Condition 5. ITS 3.10.5 Applicability is MODE 5 with ITS 3.9.5 not met. A.5 states the Applicability addition "is derived from the intent of CTS 3.9.10.1 which says "... its associated control rod drive mechanism may be removed from the reactor pressure vessel." Given that the ITS contains a similar statement as the one relied on, it is not clear how it can also be the justification for the change in Applicability.			See comment #7 for a related issue.

BNP ITS 3.10.5 SINGLE CONTROL ROD DRIVE (CRD) REMOVAL - REFUELING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.5-6	None	CTS 3.9.10.1 Action	CTS 3.9.10.1 states the requirements of CTS 3.0.3 are not applicable. ITS 3.10.5 does not contain this exception. No discussion or justification is provided for this deleted CTS requirement.			
3.10.5-7	None	ITS 3.10.5	ITS 3.10.5 allows removing a single CRD "...from a core cell containing one or more fuel assemblies." This statement which is also in the bases is not contained in CTS 3.9.10.1. Is the definition of a "core cell" the control rod and the surrounding four fuel assemblies?			

BNP ITS 3.10.6 MULTIPLE CONTROL ROD DRIVE WITHDRAWAL - REFUELING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.6-1	A.5	CTS 3.9.10.2 ITS 3.10.6	CTS 3.9.10.2 Applicability is Condition 5. ITS 3.10.6 Applicability is MODE 5 with ITS 3.9.3, 3.9.4, or 3.9.5 not met. Given that the ITS contains words similar to those taken from the CTS to justify the new Applicability, how is the justification adequate?			
3.10.6-2	M.1	ITS 3.10.6.c	CTS 3.9.10.2 requirements comparable to ITS 3.10.6.c which requires fuel assemblies loaded in compliance with an approved spiral reload sequence, do not exist. The justification is inadequate as it does not explain the purpose of the new requirement or how it is accomplished by the requirement.			
3.10.6-3	None	CTS 3.9.10.2a ITS 3.10.6	CTS 3.9.10.2.a states the "one-rod-out" interlock may be bypassed. The CTS mark-up indicates this requirement is contained in ITS LCO 3.10.6. ITS 3.10.6 only states the "full-in" position indicators may be bypassed. No discussion is provided to justify this change.			

BNP ITS 3.10.6 MULTIPLE CONTROL ROD DRIVE WITHDRAWAL - REFUELING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.6-4	None	CTS 3.9.10.2d ITS 3.10.6.b	CTS 3.9.10.2.d requires all other control rods fully inserted. The CTS markup indicates this requirement is relocated to ITS LCO 3.10.6.b. However, ITS 3.10.6.b only requires all other control rods in core cells containing one or more fuel assemblies fully inserted. No discussion or justification is provided for the changed CTS requirement.			

BNP ITS 3.10.7 CONTROL ROD TESTING - OPERATING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.7-1	JFD 10	STS SR 3.10.7.1 Bases	In accordance with the CTS or the licensing basis who is qualified to perfrom the verification of ITS 3.10.7.b?			Similar comment to 3.10.2-1.

BN[illegible] ITS 3.10.8 SHUTDOWN MARGIN (SDM) TEST - REFUELING

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.8-1	L.4	CTS SR 4.10.3	CTS 4.10.3 requires verifying Surveillance Requirements within 30 minutes (Unit 1) or within 2 hours (Unit 2) prior to starting SDM testing. ITS 3.10.8 does not contain the above times requirements. The justification states that the verification was just a "paper-check" that the surveillance was current and that now now the test will have to actually be performed. However, isn't the ITS SR requirement also just a "paper-check"? The SR requires performance of the SR "According to the applicable SRs" which have no special requirement to perform the SR while in LCO 3.10.8.			
3.10.8-2	JFD.8	ITS 3.10.8 Cond C	ITS 3.10.8 Condition C requires action if one control rod is not coupled to its associated CRD. The justification states this Condition was added by Generic Change BWR-01A and removed by Generic Change BWR-18.			This STS deviation is contingent on NRC approval of the Generic Changes.

BNP ITS 3.10.9 Recirculation Loops - Testing
BNP ITS 3.10.10 Training Startups

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.10.9-1 3.10.10-1	JFD.9	STS 3.10.9 3.10.10	The requirements of STS 3.10.9 and 3.10.-10 are deleted from the BNP ITS based on the fact that the requirements are not needed. A short discussion of why each requirement is not needed should be provided.			

BNP ITS 5.1 RESPONSIBILITY

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.1-1	LA1	CTS 6.1.1, 6.5.2.5, 6.5.2.7	CTS 6.1.1, 6.5.2.5, and 6.5.2.7 require the General Manager - Brunswick Plant to approve proposed tests, experiments, etc. ITS 5.1.1 requires the plant manager to approve proposed tests, experiments, etc. The justification is inadequate for this apparently less restrictive change of lowering the responsibility from the General Manager to the plant manager. There is no discussion or justification to equate the General Manager position to the plant manager position. "General Manager - Brunswick Plant" is plant specific, while "plant manager" seems very generic.	5-31-97		Provide discussion and justification for this less restrictive change.
BNP RESPONSE						
5.1-2	M1	CTS 6.5.2.5, 6.5.2.7	CTS 6.5.2.5 and 6.5.2.7 require approval of proposed tests, experiments, etc. which are determined to not involve an unreviewed safety question or a change to the CTS. ITS 5.1.1 requires approval of proposed tests, experiments, etc. that affect nuclear safety. There is no discussion of the USQ (10 CFR 50.59) review and approval process before and after the adoption of the new requirement.	5-31-97		Provide discussion and justification for changes in the 10 CFR 50.59 review and approval process.
BNP RESPONSE						

BNP ITS 5.1 RESPONSIBILITY

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.1-3	JFD 3	STS 5.1.2	STS 5.1.2 requires control room command functions to reside with the Shift Supervisor (SS). Absences from the control room during MODES 1, 2, or 3 require the SS to designate an active Senior Reactor Operator (SRO) license holder to assume the command function. Absences from the control room during MODES 4 or 5 require the SS to designate either an active SRO or Reactor Operator license holder to assume the command function. ITS 5.1 does not retain these requirements.	5/31/97		Include STS 5.1.2 requirements in the ITS.
BNP RESPONSE						

BNP ITS 5.2 ORGANIZATION

ISSUE #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.2-1	LA.4	CTS 6.2.1.b	CTS 6.2.1.b requires the General Manager - Brunswick Plant responsible for overall unit safety, etc. ITS 5.2.1.b requires the plant manager responsible for overall unit safety. There is no discussion or justification to equate the CTS General Manager position to the ITS plant manager position.	5/31/97		Provide discussion and justification for changing this CTS management requirement.
BNP RESPONSE						
5.2-2	LA.4	CTS 6.2.1.c	CTS 6.2.1.c requires the Senior Vice President - Nuclear Generation corporately responsible for overall plant nuclear safety, etc. ITS 5.2.1.c requires a specified corporate officer corporately responsible for overall plant nuclear safety. There is no discussion equating the CTS Senior Vice President - Nuclear Generation position to the ITS "specified corporate officer position."	5/31/97		Provide discussion and justification for changing this CTS management requirement.
BNP RESPONSE						
5.2-3	JFD 4	STS 5.2.1.a	STS 5.2.1.a requires documentation describing facility authority include functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions. ITS 5.2.1.a does not retain these requirements.	5/31/97		Retain STS 5.2.1.a requirements on organizational structures.
BNP RESPONSE						

BNP ITS 5.2 ORGANIZATION

ISSUE #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.2-4	JFD 5	STS 5.2.2.b	STS 5.2.2.b provides control room staffing requirements. ITS 5.2.2.b provides staffing requirements that do meet the requirements of 10 CFR 50.54(m)(2)(iii). Attached TSB letter to NEI of Apr 9, 97, on staffing requirements, recommends deleting paragraph 5.2.2.b since it is redundant to 10 CFR 50.54(m)(2)(iii).	5/31/97		See attached TSB letter to NEI of Apr 9, 97, on work hours, staffing, etc. Adopt proposed requirements as appropriate.
BNP RESPONSE						
5.2-5	JFD 7	STS 5.2.2.e	STS 5.2.2.e requires guidance on overtime usage by facility personnel. ITS 5.2.2.e relegates these overtime usage by facility personnel to working guidelines published by the Nuclear Regulatory Commission in Generic Letter 82-12. There is no discussion or justification for this deviation from the STS.			See attached TSB letter to NEI of Apr 9, 97, on work hours, staffing, etc. Adopt proposed requirements as appropriate.
BNP RESPONSE						
5.2-6	JFD 8	CTS 6.2.2.e STS 5.2.2.e	The CTS requires the Operations Manager to "hold or have held an STO license for either Brunswick or a similar plant." The STS requires either the Operations Manager or his assistant to hold an SRO license. The intent is that one of the managers in charge of the day-to-day operations of the plant shall hold an active SRO license for the plant they are supervising.	6/5/97		Revise the ITS to conform with the STS.
BNP RESPONSE						

BNP ITS 5.2 ORGANIZATION

ISSUE #	DOC# or JFD#	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.2-7	JFD 9	STS 5.2.2.g	STS 5.2.2.g requires the STA meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift. ITS 5.2.2.g does not include this qualification requirement.	5/31/97		Provide discussion and justification for this deviation from the STS.
BNP RESPONSE						

BNO ITS 5.3 FACILITY STAFF QUALIFICATIONS

ISSUE #	DOC# or JFD#	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.3-1	LA.1 STS 5.2	CTS 6.2.2-1	The STS deletes Table 6.2.2-1 on crew staffing requirements, due to redundancy with 10 CFR 50.54(m). 10 CFR 55.4 requirements on qualifications refers to positions in the TS. To ensure that 10 CFR 55.4 is met, a new paragraph 5.3.2 is proposed in the attached TSB letter to NEI of Apr 9, 1997, on staffing requirements.	5/31/97		See attached TSB letter to NEI of Apr 9, 1997, on work hours, staffing, etc. Adopt proposed requirements as appropriate.
BNP RESPONSE						
5.3-2	LA.1	CTS 6.3.1	CTS 6.3.1 requires the Manager - Environmental & Radiation Control meets or exceeds the qualifications of Reg. Guide 1.8, September 1975. ITS 5.3.1 requires the Manager of the radiation control function meets or exceeds the qualifications of Reg. Guide 1.8, September 1975. There is no discussion or justification to equate the CTS Manager - Environmental & Radiation Control position and job functions to the ITS Manager of the radiation control function position and job function.	3/6/97		Provide additional discussion and justification for changing the CTS requirement.
BNP RESPONSE						

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.5-6	LD.3	CTS 4.7.2.b and 4.7.2.d	CTS 4.7.2.b and 4.7.2.d requires the Control Room Emergency Ventilation System HEPA filters tested every 18 months following maintenance. ITS 5.5.7 requires a 24 month testing frequency on the Control Room Emergency Ventilation System HEPA filters following maintenance. This is a change to CTS Surveillance Test Interval.	6/2/97		This change to CTS Surveillance Test Interval is under review.
BNP RESPONSE						
5.5-7	JFD 13	STS 5.5.2	STS 5.5.2 does not contain provisions to apply SR 3.0.2 to ILRT requirements. ITS includes a statement that the provisions of ITS SR 3.0.2 apply to the 24 month frequency for performing integrated system leak test activities. There is no discussion or justification for the deviation from the STS surveillance frequency.	6/2/97		Prepare and submit a TSTF change request, for this generic change.
BNP RESPONSE						
5.5-8	JFD 1	STS 5.5.8.a	STS 5.5.8.a requires the HEPA filter penetration and bypass flow of $<0.05\%$. ITS 5.5.7 requires the HEPA filter penetration and bypass flow of $<1.0\%$. There is no discussion or justification for changing this STS requirement.	6/3/97		Provide discussion and justification for changing this STS requirement.
BNP RESPONSE						

BNP ITS 5.5 PROGRAMS AND MANUALS

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.5-9	JFD 1	STS 5.5.8.b	STS 5.5.8.b requires an inplace test of each charcoal filter of an ESF system with a penetration and system bypass <0.05%. ITS 5.5.7.b requires an inplace test of each charcoal filter of an ESF system with a penetration and system bypass <1.0%. There is no discussion or justification for changing this STS requirement.	6/3/97		Provide discussion and justification for changing this STS requirement.
BNP RESPONSE						
5.5-10	JFD 22	STS 5.5.8.c	STS 5.5.8.c requires the testing each ESF system charcoal absorber in accordance with ASTM 03803-1989 at a specified temperature. ITS 5.5.7.c does not contain this requirement.	6/3/97		Provide discussion and justification for not incorporating this STS requirement.
BNP RESPONSE						
5.5-11	JFD 23	STS 5.5.8.d	STS 5.5.8.d requires demonstrating the pressure drop across the combined HEPA filters, the prefilters, and the charcoal absorber of each ESF ventilation system is less than the value specified in the table. ITS 5.5.7.d requires demonstrating the pressure drop across the combined HEPA filters, the prefilter (SGT only), and the charcoal absorber of each ESF ventilation system is less than the value specified in the table. The ITS also deletes reference to RG 1.53 and ASME-510.	6/3/97		Provide discussion and justification for changing these STS requirements.
BNP RESPONSE						

BNP ITS 5.5 PROGRAMS AND MANUALS

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.5-12	JFD 27 M.4	STS 5.5.10.a	STS 5.5.10.a requires new fuel oil to have an API gravity or an absolute specific gravity within limits, a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and a clear and bright appearance with proper color. ITS 5.5.9.a requires determining new fuel oil not contaminated with other products during transit, thus altering the quality. Even accepting a cetificate of compliance from the supplier does not necessitate the elimination of the specific criteria of significance from the SR. The discussion and justification is inadequate for changing this STS requirement.	6/4/97		Provide adequate discussion and justification for changing this STS requirement; or retain the acceptance criteria in the SR.
BNP RESPONSE						
5.5-13	JFD 27	STS 5.5.10.b	STS 5.5.10.b requires testing fuel oil every 31 days after adding to storage tanks. ITS 5.5.9.b requires testing every 92 days. There is no discussion or justification for the deviation from the STS Surveillance Test Frequency.	6/4/97		Provide discussion and justification for the STS Surveillance Test Frequency deviation.
BNP RESPONSE						

BNP ITS 5.5 PROGRAMS AND MANUALS

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.5-14	JFD 27	STS 5.5.10.c	STS 5.5.10.c requires testing fuel oil particulate concentration in accordance with ASTM D-2276, Method A-2 or A-3. ITS 5.5.9.c requires testing fuel oil particulate concentration in accordance with the applicable standard. There is inadequate discussion and justification for changing the STS required testing standard.	6/4/97		Provide adequate discussion and justification for changing this STS requirement, and submit a TSTF change request.
BNP RESPONSE						

BNP ITS 5.6 REPORTING REQUIREMENTS

ISSUE #	DOC# or JFD#	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.6-1A	L.1	CTS 6.9.1.6	CTS 6.9.1.6 requires annually submitting the radiological environmental operating reports prior to May 1 of each year. ITS 5.6.1 requires annually submitting the radiological environmental operating reports prior to May 15 of each year.	6/5/97		BNP can opt for change of submittal date from May 1 to May 15.
BNP RESPONSE						
5.6-2A	A.5	CTS 6.9.2	CTS 6.9.2 requires submitting numerous special reports to the Regional Administrator or the Regional Office. ITS 5.6.4 does not retain this requirement, and the justification implies that the reports are adequately addressed in other TS. Many of these reports are actually removed from TS.	6/5/97		Provide additional discussion on the actual ultimate location of these CTS requirements, and the controlling mechanisms.
BNP RESPONSE						
5.6-3A	STS 5.6.2	JDC1	STS 5.6.2 requires the Annual Radiological Environmental Operating Report identify the TLD results that represent collocated dosimeters, etc. ITS 5.6.2 does not contain this requirement. There is no discussion and justification for not including the STS requirement.	6/5/97		Provide discussion and justification for not including this STS requirement.
BNP RESPONSE						

BNP ITS 5.7 HIGH RADIATION AREA

ISSUE#	DOC # or JFD #	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.7-1A	L.1	CTS 6.12.2	ITS 5.7.2.a.1 requires keys to High Radiation Areas be under the administrative control of the shift superintendent or the radiation control supervisor.	6/5/97		Suggest that the phrase "or designated representative," be added after "shift superintendent or the radiation control supervisor."
BNP RESPONSE						

BNP CTS 3/4.4.4 CHEMISTRY

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3-444-1	R.1	CTS 3.4.4 CTS 4.4.4	CTS 3.4.4, Reactor Coolant System Chemistry, and CTS 4.4.4, Surveillances, are relocated to a Technical Requirements Manual. There is no discussion of how the TRM and its changes are controlled.			

BNP CTS 3/4.4.8 STRUCTURAL INTEGRITY

ITEM #	DOC or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3-448-1	R.1	CTS 3.4.8 CTS 4.4.8	CTS 3.4.8, Structural Integrity, and CTS 4.4.8, Surveillances, are relocated to a Technical Requirements Manual. There is no discussion of how the TRM and its changes are controlled.			

BNP ITS 3/4.7 Relocated CTS

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3/4.7	R.1	CTS 3/4.7	CTS 3/4.7 includes LCOs, Required Actions and Surveillance Requirements which may be relocated to a Technical Requirements Manual (TRM). The TRM must be incorporated into the UFSAR and controlled via 10 CFR 50.59.	05/30/97		Provide additional discussion listing the licensee controlled documents containing the relocated requirements, and the method used to control these documents.

BNP CTS 6 RELOCATED REQUIREMENTS

ISSUE#	DOC # or JFD #	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
6-1	LA.1 LA.2	CTS 6.5 CTS 6.6 CTS 6.8 CTS 6.10 CTS 6.14	The CTS sections on Review and Audits (6.5), Reportable Event Action (6.5), Procedure Review and Approval Processes (6.8), Record Retention (6.10), and PCP Implementation Procedures (6.14), all contain information to be relocated to the QAP.	6/6/97		These requirements must be relocated to the QAP. Provide a revised copy of the QAP for NRC review prior to NRC issuance of the ITS license amendment.
BNP RESPONSE						

BNP CTS 3.9.2 REFUELING OPERATIONS - INSTRUMENTATION

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			No Issues Found			Moved to ITS 3.3.-1.2

BNP CTS 3.9.4 REFUELING OPERATIONS - DECAY TIME

ISSUE #	DOC# or JFD#	CTS/STS REF.	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.9.4-1	LA.1	CTS 3/4.-9.4	CTS 3/4.9.4 requires a decay time of 24 hours before moving fuel in the RPV. This requirement is moved to plant procedures (changes to plant procedures are governed by the BNP procedure control processes). No discussion is provided identifying the plant procedures.	5/30/97		Provide additional discussion identifying the plant procedures containing the CTS 3/4.9.4 requirements. This requirement shall be relocated tc procedures incorporated into the UFSAR and controlled by 10 CFR 50.59.

BNP ITS 5.4 PROCEDURES

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.4-1	A.2	CTS 6.8.1 b/c/d, STS 5.4.1	PCP Implementation procedures have been deleted; they should be moved to QAP.	5/31/97		Move PCP Implementation Procedures to QAP. Submit revised QAP prior to issuance of ITS SER.
BNP RESPONSE						
5.4-2	A.3	CTS 6.8.1 d/e	The Security Plan and Emergency Plan implementation Procedures have been deleted; they should be moved to their respective plans.	5/31/97		Move Security Plan and Emergency Plan Implementation Procedures to their respective plans.
BNP RESPONSE						

BNP ITS 5.5 PROGRAMS AND MANUALS

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.5-1	A.2 JFD 13	CTS 6.8.3.1 6.8.3.4 4.0.5.c	CTS 6.8.3.1, 6.8.3.4, and 4.0.5.c do not contain the statement that "the provisions of ITS SR 3.0.2 and ITS SR 3.0.3 are applicable, etc." ITS 5.5.2, 5.5.6, 5.5.7, 5.5.8, 5.5.9, and 5.5.12 contain the statement that "the provisions of ITS SR 3.0.2 and ITS SR 3.0.3 are applicable, etc." The statement permits extending the frequency of the SR in order to satisfy the requirements of the SR in a timely manner. These are less restrictive requirement changes for which there is inadequate discussion or justification.	6/2/97		Provide discussion and justification for these less restrictive requirements. Submit TSTF change request due to generic nature of proposed changes.
BNP RESPONSE						
5.5-2	A.9	CTS 4.8.1.1.2.c	CTS 4.8.1.1.2.c requires obtaining a sample of diesel fuel in accordance with ASTM D270-65 and the limits established by ASTM D975-74. ITS 5.5.9 does not contain the sampling requirement of ASTM D270-65 and changes the acceptance limit requirements document to ASTM 2-D. This is a less restrictive requirement change for which there is inadequate discussion or justification.	6/2/97		Provide discussion and justification for these less restrictive requirements.
BNP RESPONSE						

BNP ITS 5.5 PROGRAMS AND MANUALS

ISSUE #	DOC # or JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
5.5-3	LA.7	CTS 4.8.1.1.2.c	CTS 4.8.1.1.2.c requires sampling the diesel fuel storage tanks per ASTM-D270-65 and the fuel oil meet the quality requirements of ASTM D975-74. ITS 5.5.9, Diesel Fuel Oil Testing Program, does not contain the sampling requirements and require an oil quality standard of ASTM 2-D fuel oil. There is no discussion or justification of this less restrictive requirement that the quality standard of ASTM D975-74 equates to ASTM 2-D fuel oil.	6/2/97		Provide discussion and justification for changing this CTS quality standard requirement.
BNP RESPONSE						
5.5-4	LD.1	CTS 6.8.3.1.2	CTS 6.8.3.1.2 requires the integrated leak test at refueling cycle intervals or less. ITS 5.5 requires the integrated leak test at a 24 month interval. This is a change to CTS Surveillance Test Interval.	6/2/97		This change to CTS Surveillance Test Interval is under review.
BNP RESPONSE						
5.5-5	LD.2	CTS 4.6.6.1.b and 4.6.6.1.d	CTS 4.6.6.1.b and 4.6.6.1.d requires an 18 month testing frequency on the ventilation system HEPA filters following maintenance. ITS 5.5.7 requires a 24 month testing frequency on the ventilation system HEPA filters following maintenance. This is a change to CTS Surveillance Test Interval.	6/2/97		This change to CTS Surveillance Test Interval is under review.
BNP RESPONSE						