

NOVEMBER 17, 2021 PUBLIC MEETING

TURKEY POINT AND ST. LUCIE

IMPROVED TECHNICAL SPECIFICATIONS COVERIONS

ISSUES IDENTIFIED TO DATE

NOTE: All page numbers are taken from the Adobe count for the associated document in the Agencywide Document Access and Management System (ADAMS).

GENERIC – St. Lucie and Turkey Point

1. In general, the submittal does not address the identified plant specific conditions that the licensee must meet to adopt various STS NUREG changes since improved STS were issued in 1992. Therefore, provide a list of all unapproved changes (applicable to NUREG 1431) to STS Rev 0 (issued in 1992) beginning in 1993, and included in STS Rev 1 (issued in 1995), beginning in 1995 when the current TSTF change process began; and included in STS Rev 2, 2.1, 2.2 (issued in 2001) beginning in 2001; and included in STS Rev 3, 3.1 (issued in 2004) beginning in 2004; and included in STS Rev 4 (issued in 2012) beginning in 2012; and included in STS Rev 5 (issued in 2021), through TSTF-577.

For each TSTF traveler, the list should discuss the disposition of each change in each affected ITS Specification subsection and in the associated ITS Bases section(s) (which are Background, Applicable Safety Analyses, LCO, Applicability, Actions, Surveillance Requirements, and References). For each unapproved TSTF, the licensee should identify each of the plant-specific conditions and how the licensee has/will meet each of the conditions that must be met for each unapproved STS change, as provided in the TSTF itself.

Where the CTS, as reformatted in the ITS, technically or editorially differs from the corresponding provision or passage in Rev. 5 of the improved STS, a JFD should reference the technical safety case for the technical difference provided in the approved NRC model safety evaluation; if an editorial difference, provide the rationale addressing why it is not a technical difference. In addition, a summary of the safety case may be included in the JFD.

SECTION SPECIFIC – Turkey Point

Volume 6 – Section 3.1 (ADAMS Accession No. ML21265A377)

1. ITS 3.1.1 – page 18 – The proposed Bases for improved technical specifications (ITS) markup subsection 3.1.1 do not appear to include Applicable Safety Analyses (ASA) section passages about reactivity excursion transients resulting from reactor coolant pump (RCP) start. The markup of the ASA section of the Bases for STS Subsection 3.1.1, indicates that JFDs 1 and 5 apply to this omission. Address whether this transient is included as an analyzed transient in the Updated Final Safety Analyses Report (UFSAR), and/or if the passage is valid for TPN.

Volume 8 – Section 3.3

1. On Page 450/499 Enclosure 2 Vol 8 (ITS 3.3), The Final Policy Statement on TS Improvements for Nuclear Power Reactors states "When licensees submit amendment requests based on this Policy Statement, they should identify the location of and controls for the technical and administrative requirements of the relocated requirements." Discussion of Changes for CTS 3.3.3.2 R01 does not state where requirements for the MIDS will be relocated or changes controls that would apply.

Volume 10 – Section 3.5 (ADAMS Accession No. ML21265A381)

1. ITS 3.5.1 – page 5 - The proposal is to change the COMPLETION TIME for CTS 3.5.1 Action a. from 1 hour to 24 hours, consistent with ITS and WCAP-15049-A. Address the applicability of WCAP-15049-A to TPN and intended implementation of any limitations and/or conditions for this topical report.
2. ITS 3.5.2 - page 52 - Under the ITS Bases background, language documenting hot leg recirculation. It states: After 6.5 hours the hot leg recirculation is fully initiated. The ECCS is cycled back to the cold legs by 17 hours into the event with all subsequent cycling on 16 hour intervals until boiling is terminated. Section 14.3.2.3.3 of the UFSAR indicates that hot leg recirculation is "completed" by 6.5 hours after the event. Address the discrepancy between the proposed language and the UFSAR.
3. ITS - 3.5.2 – page 35 - CTS SURVEILLANCE REQUIREMENT (SR) 4.5.2 g.1 requires the position stops for ECCS throttle valves be verified to be in the correct position within 4 hours following completion of each valve stroking operation or maintenance on the valve when the valve is required to be OPERABLE. The ITS does not contain this requirement. This changes the CTS by eliminating the requirement from TS.
4. ITS 3.5.2 – page 49 - For SR 3.5.2.8, the licensee is placing information that deviates from the STS. However, the submittal does not indicate that information in the CTS SR is being moved to the ITS bases regarding SR 3.5.2.8. Properly characterize the proposed change and provide the appropriate support for the proposed relocation.
5. ITS 3.5.2 – page 55 - In last paragraph of background of Bases for 3.5.2, the licensee refers to other TSs. The licensee points to containment sump and provides a correction indicating 3.6.19, "containment sump" of ISTS is 3.6.8 for the plant-specific TSs. However, in TS 3.6, it is indicated that TPN is not adopting the containment sump TS. Properly characterize the proposed change and provide the appropriate justification for the deviation from NUREG-1431.
6. ITS 3.5.3 – page 76 - CTS 3.5.3 ACTION a. allows one hour to restore an emergency core cooling system (ECCS) flow path from the refueling water storage tank (RWST) and, if it cannot be restored, requires a cooldown to COLD SHUTDOWN. ITS 3.5.3 requires an immediate initiation of Action to restore the ECCS train. This changes CTS by eliminating a cooldown requirement if the flow path cannot be restored.
7. The purpose of CTS 3.5.3 ACTION a is to restore an ECCS flow path if there is none OPERABLE and further requires a cooldown if it cannot be restored. ITS does not require a cooldown but requires immediate Action to commence to restore the ECCS train. This is the more prudent action when there is no cooling capability. Since the ECCS is the

preferred cooldown method and it is not available, it is more prudent to stay in MODE 4 until a train of ECCS can be restored. This change is acceptable because the Required Actions are used to establish remedial measures that must be taken in response to the degraded conditions in order to minimize risk associated with continued operation while providing time to repair inoperable features. The Required Actions are consistent with safe operation under the specified Condition. This includes a reasonable time for repairs or replacement, and the low probability of a design basis accident (DBA) occurring during the repair period. With no ECCS flow paths available, it would be unwise to require the plant to go to MODE 5, where the only available heat removal system is the RHR. Therefore, the appropriate action is to initiate measures to restore one ECCS RHR subsystem and to continue the actions until the subsystem is restored to OPERABLE status. This change is designated as less restrictive because less stringent Required Actions are being applied in the ITS than were applied in the CTS.

8. ITS 3.5.4 – page 97 - The change to the current technical specifications (CTS) markup is to increase the COMPLETION TIME for restoration of an inoperable refueling water storage tank (RWST) due to boron concentration or temperature not within limits from one hour to eight hours. In DOC L02, the licensee indicated that one hour is not sufficient to address changes in boron concentration and/or temperature. Provide the justification that supports the eight-hour completion time change.
9. ITS 3.5.4 – page 97 - CTS 3.5.4 ACTION, in part, specifies that if the requirements of CTS 3.5.4 are not satisfied, the reactor shall be placed in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ITS 3.5.4 Condition C states that if the Required Actions and associated Completion Times have not been met, the reactor must be placed in MODE 3 within 6 hours and in MODE 4 within a total of 12 hours. This changes the CTS by permitting a Required Action end state of hot shutdown (MODE 4) rather than an end state of cold shutdown (MODE 5).

L02 indicates that the four conditions for Technical Specification Task Force (TSTF) traveler TSTF-432-A Revision 1 (ADAMS Accession No. ML103360003) have addressed in the adoption of TSTF-432-A Bases. Provide the information which verifies adoption of the identified conditions.

Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A382)

1. ITS 3.6.2 - page 34 - CTS markup to SR 4.6.1.3.a (related to containment air locks) points to ITS SR 3.6.2.1 as the ITS SR that meets CTS SR 4.6.1.3.a requirements. However, ITS SR 3.6.2.1 does not appear to fully meet the requirements of CTS SR 4.6.1.3.a (i.e., missing: "Following each closing, ... by verifying that the seals have not been damaged ... by vacuum testing...") and there is no associated DOC associated with CTS SR 4.6.1.3.a that addresses this requirement. Address the missing requirement to verify no seal damage by vacuum testing.
2. ITS 3.6.3 - page 65- The CTS markup DOC A07 description refers to containment air locks while the DOC A07 subject (CTS SR 4.6.1.7.2) appears to be limited to containment purge and exhaust. Provide a discussion for the proposed change to the containment air locks.
3. ITS 3.6.3 - page 78 - The ISTS 3.6.3 markup, in the left margin by Required Action A.2, references DOC L07. Address how/whether DOC L07 applies to or is associated with Required Action A.2.

4. ITS 3.6.3 - page 82 - The ISTS 3.6.3 markup references DOC L02 in the left margin near Condition C (insert 2). It is not clear that DOC L02 applies because it appears that DOC L02 is limited to penetration flow paths with two containment isolation valves (CIVs). Address the applicability of L02 to Condition C (insert 2).
5. ITS 3.6.5 - page 136 – The CTS LCO 3.6.1.5 markup does not show "primary" as a deletion with a corresponding DOC. Properly characterize the change and provide the appropriate justification.
6. ITS 3.6.6 - pages 160 and 163 – Discussion of Changes (DOCs) L01 and L05 (containment spray and containment cooling, respectively) discuss changes to the current technical specifications (CTS) that would permit a Required Action end state of HOT SHUTDOWN (MODE 4) rather than an end state of COLD SHUTDOWN (MODE 5).

For specific TS conditions, TSTF-432 and Westinghouse Topical Report WCAP-16294-A R1 (ADAMS Accession No. ML103430249) justifies MODE 4 as an acceptable alternate end state to MODE 5.

The WCAP states that the containment spray and containment cooling systems are designed for accident conditions initiated at power. One train of each system satisfies the assumptions in the safety analyses and one train of containment spray is required to satisfy assumptions regarding iodine removal. If one train of either containment spray or containment cooling is inoperable the other train is available to mitigate the accident along with both trains of the other system. If both trains of containment cooling are inoperable, containment spray can serve as the cooling system and it also serves to remove iodine. Therefore, sufficient defense-in-depth is maintained when the endstate is changed from MODE 5 to MODE 4.

ITS 3.6.6 justification for deviation (JFD) 4 explains that the redundancy in cooling capability is no longer available due to power uprate and one containment spray train and two emergency containment cooling units are required to provide post-accident cooling.

Turkey Point Units 3 and 4 (PTN) design for containment spray and containment cooling differs from the standard TS (STS) design assumed in the TSTF-432 and WCAP-16294-A.

Given that the containment spray and containment cooling design differ from the systems, structures or component (SSC) design assumed in the STS (TSTF-432 and WCAP-16294), explain how TSTF-432 and WCAP-16294 justify these less restrictive changes for ITS 3.6.6, as described in DOCs L01 and L05.

7. ITS Bases 3.6.5 - page 145 – ITS Bases 3.6.5 Applicable Safety Analysis markup inserts temperature values without support. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated temperature information.
8. ITS Bases 3.6.6 - page 179 - ITS Bases 3.6.6 Applicable Safety Analyses markup changes containment "High-3" pressure setpoint to containment "High-2" pressure setpoint. Provide the UFSAR reference that supports the selection for the "High-2" pressure setpoint.
9. ITS Bases 3.6.6 - page 180 – ITS Bases 3.6.6 Actions A.1 refers to "... the redundant heat removal capability afforded by the Containment Spray System, ..." However, based on ITS 3.6.6 JFD 4, it appears that redundancy in heat removal is afforded by combinations of

containment spray and emergency containment cooling units. Provide a discussion that addresses which system(s) afford heat removal capability in this context.

Volume 16 - Section 5.5 (ADAMS Accession No. ML21265A387)

1. ITS 5.5 – page 55 - The JFD for ITS 5.5, Programs and Manuals had a lot of deviations to this section, however the plant-specific details in support of those deviations are generally insufficient to justify the proposed deviations detailed in order for me to understand why they deviated.
2. ITS 5.5.9 - pages 67 & 94 – ITS 5.5.9.c address provisions for steam generator (SG) tube repair criteria. However, this section is missing, and no justification has been provided. Discuss the provisions intended for the TS required SG tube repair criteria
3. ITS 5.5.13 – page 60 – The CTS has different language for describing the containment leakage rate testing program than that provided in NUREG-1431. Address the deviation from ITS 5.5.13 in NUREG-1431.
4. ITS 5.5.14 - page 73 - In ITS 5.5.14, it appears that the licensee is adopting TSTF-500, but a justification consistent with the information required by the model application for the traveler does not appear to be included in the submittal. Provide the technical information as discussed in the associated TSTF.
5. Licensee is applying TSTF-577-A to its conversion. Provide the technical information as discussed in the associated TSTF. See page 76 of 155 of Chapter 5 document.

SECTION SPECIFIC – St. Lucie

Enclosure 2 - Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A296)

1. ITS 3.6.1 - page 7 - PSL U1 CTS 3.6.1.2 markup is described in part by DOC A02. It appears that DOC A02 does not describe deleting the CTS 3.6.1.2 requirement to "restore the overall leakage rate ... prior to increasing the reactor coolant system temperature above 200F." Provide justification for deleting this requirement.
2. ITS 3.6.1 – page 13 - PSL U1 CTS 3.6.1.2 markup is described in part by DOC A02. It appears that DOC A02 does not describe deleting the CTS 3.6.1.2 requirement to "restore the overall leakage rate ... prior to increasing the reactor coolant system temperature above 200F." Provide justification for deleting this requirement.
3. ITS Bases 3.6.2 – page 75 - PSL U2 B 3.6.2 markup to the Applicable Safety Analysis shows Pa as 43.43 psig. Based on CTS, it appears this Pa value is incorrect (see CTS 6.8.4.h for Containment Leakage Rate Testing Program; see also ITS 5.5.13.b).
4. ITS 3.6.3 – page 102 – PSL U2 CTS 3.6.1.7 markup contains a NOTE that was not fully adopted by the corresponding ITS 3.6.3 ACTION E.2 Notes (page 132). It appears that ITS 3.6.3 ACTION E.2 Note 2 was deleted (part of CTS NOTE) without justification. Provide justification for deleting ITS 3.6.3 ACTION E.2 Note 2.
5. ITS Bases 3.6.3 – page 149 – PSL U1 B 3.6.3 markup deletes the Reviewers Note related to purge valves. The note explains that the options for purge valve leakage are based

primarily on the design. The justification for purge valve leakage did not address the Reviewers Note.

6. ITS Bases 3.6.5 – page 219 – PSL U1 B 3.6.3 Applicable Safety Analysis markup inserts temperature values without support. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated temperature information.
7. ITS Bases 3.6.5 – page 224 – PSL U2 B 3.6.3 Applicable Safety Analysis markup inserts temperature values without support. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated temperature information.
8. ITS 3.6.7 – page 318 – PSL U2 SR 3.6.7.3. No basis for shield building flowrate and time limit values is provided in ITS SR 3.6.7.3. Provide the UFSAR reference (e.g., section, table, figure, page number, etc.) which supports confirmation of the associated information.
9. ITS Bases 3.6.7 – page 334 – PSL U2 B 3.6.7: SR Bases discussion for SR 3.6.7.3 provides a time limit value that differs from the actual SR. There should not be a difference between the actual SR and the SR Bases.
10. ITS Bases 3.6.8 – page 354 – PSL U2 B 3.6.8 INSERT 1 adds ASME Code information regarding “containment external pressure load” (1.05 psig) that is different from the ASME Code information provided in the PSL Unit 2 UFSAR (see page 3.8-10).
11. ITS Bases 3.6.10 – page 433 – PSL U1 SR 3.6.10.5 adds flow rate (gpm) information that is different from CTS SR 4.6.2.2.d (the ITS has a different flow band as compared to the CTS).
12. On Page 197/296 Enclosure 2 Vol 16 (ITS 5.0), The last sentence of Justification For Deviations #9 cites a plant specific approval and the plant is not Saint Lucie. The related CTS is 3.8.6, and ITS is 5.5.14 “Battery Monitoring and Maintenance Program”.
13. Unit 1 and Unit 2, CTS 3.6.2.1 Action 1.a (one containment spray train inoperable), has a restore time of 72 hours or in accordance with the Risk Informed Completion Time. The CTS markup proposed to change the restore time to 7 days or in accordance with the Risk Informed Completion Time. A discussion for this change is provided in ITS 3.6.6 DOC L01. The associated ISTS Bases 3.6.6 markup (see ITS Section 3.6.6 pdf page 271 (U1) or 286 (U2)) for this condition (one containment spray train inoperable) has a reviewer's note that states:

Utilization of the 7 day Completion Time for Required Action A.1 [one containment spray train inoperable] is dependent on the licensee adopting CE NPSD-1045-A (Ref. 6) and meeting the requirements of the Topical Report and the associated Safety Evaluation including the following commitment: “[LICENSEE] has enhanced its Configuration Risk Management Program, as implemented under 10 CFR 50.65(a)(4), the Maintenance Rule, to include a Large Early Release Fraction assessment to support this application.” Otherwise, a 72 hour Completion Time applies.

Based on ITS 3.6.6 DOC L01, it appears that there was no consideration given to adoption of CE NPSD-1045-A and the associated Safety Evaluation and commitment. Provide an explanation for why there was no discussion of the proposed change consistent with the ISTS Bases 3.6.6 described above. In addition, describe how the limitations specified in the Topical Report and in the associated NRC safety evaluation, as well as the commitment, are met or are not applicable.

Enclosure 2 -Volume 16 – Section 5.0, “Administrative Control, Revision 0” (ADAMS Accession No. ML21265A301)

1. For Unit 2, refer to Pages 199 through 204 of the subject document. The relaxed inspection requirements were approved in Amendment No. 205, dated November 18, 2020 (ADAMS Accession No. ML20259A298). Previously, PSL Unit 2 RCP flywheels were inspected per NRC Regulatory Guide 1.14, “Reactor Coolant Pump Flywheel Integrity,” Revision 1 and the requirements were previously contained in the CTS pre-Amendment 205 requirements. NRC Regulatory Guide 1.14 describes a method acceptable to the NRC staff of implementing RCP flywheel inspection requirements and include a recommended inspection schedule. Since the PSL RCP flywheels consisting of ASTM A-543 material were previously inspected per Regulatory Guide 1.14, Revision 1, August 1975 and the requirements were previously approved for use for Unit 2, the pre-Amendment 205 requirements are proposed to be restored in support of future RCP flywheel exchanges between Unit 1 and Unit 2. This change is designated as less restrictive because RCP flywheel inspection requirements, which have been previously approved for use at PSL, have been added
2. For IST 5.7, CTS changes do not appear to be consistent with NUREG-1432. The CTS for the most part is retained and the language in the ITS was deleted (basically inserting what is in the CTS versus what is in the ITS). The JFD is boilerplate high level information without the proper details as to why the CTS language is being kept and the ITS language not adopted and deleted.

NOVEMBER 18, 2021 PUBLIC MEETING

TUKEY POINT AND ST. LUCIE

IMPROVED TECHNICAL SPECIFICATIONS COVERIONS

EDITORIAL ITEMS IDENTIFIED TO DATE

Turkey Point

General

- a. Volumes 2, 4,7, 14, and 15 of Enclosure 2 to the submittal dated September 22, 2021 cites consistency with "NUREG-1432, Rev. 5.0." As NUREG-1432 applies to Combustion Engineering Plants and the remaining volumes reference NUREG-1431, "Westinghouse Plants, Rev. 5 STS," identify which NUREG the cited volumes are intended to be compared against.

Volume 8 – Section 3.3

- a. On Page 448/499 Enclosure 2 Vol 8 (ITS 3.3) and P 18 & 21/130 Encl 2 Vol 7 (ITS 3.2), TS 3.3.3.2 for Movable Incore Detector System is proposed for removal, but ITS 3.2.1 Required Action C.2.2 and SR 3.2.1.2 call out MIDS as a SSC.
- b. On Page 29/499 Enclosure 2 Vol 8 (ITS 3.3), Discussion of Changes L05 is missing the letter "d" after the word "require" in the last sentence of the first paragraph.

Volume 10 – Section 3.5 (ADAMS Accession No. ML21265A381)

- a. ITS 3.5.2 – page 42 - In the improved technical specifications (ITS) markup the licensee indicates that the safety injection (SI) flow paths isolated when T_{avg} less than or equal to 380 degrees. Page 30 the current technical specifications (CTS) markup states less than 380 degrees.
- b. ITS 3.5.2 – page 49 – The Surveillance Frequency is missing. Page 34 states that the frequency is "In accordance with the Surveillance Frequency Control Program [SFCP]"
- c. ITS - 3.5.2 – page 63 - under Insert 4A, E.1. Action E.1 states: "...EDG must be restored. The 14 day or in accordance..." It appears the phrase should state: "...EDG must be restored within 14 days or in accordance..." Therefore, it appears there is a typo in E.1 of the BASES.
- d. ITS - 3.5.2 - pages 49 & 70 - The Frequency for SR 3.5.2.9 is missing. Also, page 70 of 142 for the bases for SR 3.5.2.9, has the SR as "SR 3.5.3.9."
- e. ITS - 3.5.2 - page 56 – The bases includes an extra space for 3.5.2 after deletion of Ref. 3. There is an extra "s" after "Ref." although the revised only refers to one reference now instead of two.

- f. ITS 3.5.2 - page 58 - In the markup of ITS (page 42) the licensee indicates that the safety injection (SI) flow paths isolated when T_{avg} less than or equal to 380°F, but the CTS (page 30) states less than 380°F. Similarly, the ITS BASES limiting condition for operation (LCO) discussion on the last paragraph, does not reflect that T_{avg} is maintained less than 380 not less than or equal to 380°F.
- g. ITS - 3.5.2 – page 61 - In the bases describing Action H.1 and H.2, the licensee adds language stating "component or flow path in...". However, ITS 3.5.2 discusses equipment and flow paths.

Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A382)

- a. ITS 3.6.1 - page 28 -The ITS 3.6.1 Bases justification for deviation (JFD) page has a footer that states Sequoyah Unit 1 and Unit 2. Given that this is a TPN application it appears that this is an editorial error.
- b. ITS 3.6.2 - page 43 – The ISTS 3.6.2 markup appears to be missing Discussion of Changes (DOC) M01 reference (in the left margin) for Required Action A.1.
- c. ITS 3.6.3 - page 63 - The CTS SR 4.6.4.2.c markup associated with ITS 3.6.3 refers to DOC LA01. DOC LA01 refers to "containment purge and exhaust isolation" signal whereas CTS SR 4.6.4.2.c refers to "containment ventilation isolation test signal." In addition, LA01 refers to ITS SR 3.6.3.8, which does not exist.
- d. ITS 3.6.3 - page 69 - The ITS 3.6.3 DOC L01 refers to CTS 3.6.3.1. It appears that CTS 3.6.3.1 does not exist.
- e. ITS 3.6.3 - page 70 – The ITS 3.6.3 DOC L02 refers to CTS 4.6.1.1.a.1. It appears that this CTS item does not exist.
- f. ITS 3.6.3 - page 84 - The ITS 3.6.3 markup to SR 3.6.3.1 refers to JFD 5. It appears that this is incorrect because JFD 5 indicates that this SR is not necessary and was deleted. In addition, ITS 3.6.3 markup shows SR 3.6.3.2 as deleted and cites JFD 5. However, JFD 5 description does not state that it applies to deletion of SR 3.6.3.2.
- g. ITS 3.6.4 - page 126 - The ITS 3.6.4 JFD 2 appears to erroneously refer to the ITS Bases.
- h. ITS 3.6.5 - page 137 – The ITS 3.6.5 DOC LA01 refers to CTS 4.6.1.5.1. It appears that there is no CTS with that numbering.
- i. ITS 3.6.6 - page 157- The DOC and JFD for ITS 3.6.6 are currently entitled containment spray system. However, the ITS 3.6.6 DOCs discuss both containment spray and containment cooling units. It appears that the title should reflect both.
- j. ITS 3.6.6 - page 158 - DOC A04 refers to CTS 3.6.2.1 Action b on two occasions. It appears the second use is incorrect and should be CTS 3.6.2.2 Action b.
- k. ITS 3.6.6 - page 167 - ITS 3.6.6 markup for new Condition D refers to DOC L06 in the margin. It appears there is no DOC L06.

- l. ITS 3.6.6 - page 167 - ITS 3.6.6 markup to new Condition E refers to JFD 2. JFD 2 does not appear to apply (not bracketed info).
- m. ITS BASES 3.6.6 - page 179 – The ITS BASES 3.6.6 Applicable Safety Analysis markup refers to emergency containment cooling "train." Given that the PTN ITS 3.6.6 LCO refers to emergency containment cooling "units," it appears that referring to emergency containment cooling train in the Bases for ITS 3.6.6 is inconsistent.

Volume 16 - Section 5 (ADAMS Accession No. ML21265A387)

- a. ITS 5.3.1 – pages 35 and 36 - both pages contain the same "Insert 1" language for the same specification. It appears the "Insert 1" language was inadvertently included twice.
- b. ITS 5.4.1 – page 42 - the licensee indicates in the CTS markup that "6.8.1.e" should be identified as "5.4.1.d" in the proposed ITS markup; however consistent with the DOC on page 43 and the ITS markup, it appears that "6.8.1.e" should be numbered as "5.4.1.c."
- c. ITS 5.4.1 - page 46 - it appears that the word "in" was deleted, however it appears the language is necessary to support incorporation of the proposed "Quality Assurance Topical Report".
- d. ITS 5.6.2 - page 129 - the "r" in the deleted "year" needs to also be deleted.
- e. ITS 5.7.1 – page 146 – DOL L01 identifies ITS 5.8.1.d as providing similar requirements as CTS 6.1.2.1. As the ITS markup does not include a section 5.8.1, the topic seems more aligned with 5.7.1.d.

St. Lucie

Enclosure 2 - Volume 11 – Section 3.6 (ADAMS Accession No. ML21265A296)

- a. ITS Bases 3.6.8 – page 356 – PSL U2 SR Bases information associated with SR 3.6.8.1 cites a reference but the reference number was deleted (redline strike through) and not replaced; it appears it should have been updated with the appropriate reference number.
- b. ITS 3.6.9 – page 367 – PSL U2 CTS 3.6.6.1 ACTION b(1) markup refers in part to ITS 3.6.9 ACTION D. It appears that it should refer to ACTION C.
- c. ITS 3.6.9 – page 367 – PSL U2 CTS SR 4.6.6.1.b markup is missing a reference to the ITS Section number (it simply states "See ITS").
- d. ITS Bases 3.6.10 – page 433 – PSL U1 SR 3.6.10.5 adds flow rate (gpm) information that is different from CTS SR 4.6.2.2.d (the ITS has a different flow band as compared to the CTS).
- e. On Page 197/296 Enclosure 2 Vol 16 (ITS 5.0), The last sentence of Justification For Deviations #9 cites a plant specific approval and the plant is not Saint Lucie. The related CTS is 3.8.6, and ITS is 5.5.14 "Battery Monitoring and Maintenance Program".

Enclosure 2 -Volume 16 – Section 5.0, (ADAMS Accession No. ML21265A301)

- a. In the markup of the CTS, the licensee indicates on page 5 of 296 that its CTS 6.1 is ITS 5.2, when in fact it is ITS 5.1.
- b. On page 17 of 296, licensee indicates that language added per ITS for CTS 6.2.1.d. The language added based on the ITS is missing the term "organizational". However, it is included in the ITS markup.
- c. In the Insert 6 for the ITS on page 180 of 296 for St. Lucie 2, licensee indicates less than or equal to 8.5" instead of less than, which is what their CTS indicates for the SBVS Delta P. See page 111 of 296 for CTS.