

**Expectations for Licensee's Responses to
Improved Technical Specification (ITS) Conversion
License Amendment Request (LAR) and
Requests for Additional Information (RAIs)**

The NRC staff expects the licensee to provide the following items, as applicable, in response to requests for additional information (RAIs). Fully addressed issues will save resources and time.

We noted the following issues in the supplement:

- The licensee did not provide clear or enough information.
- The supplement did not address the editorial items raised by the NRC staff.
- **Items not addressed in the supplement will be uploaded to the Q&A database.**

Expectations for RAI responses:

- The licensee will respond in the database and attach affected documents.
- If changes are necessary to any part of the LAR, the licensee's response will include attached markups of the relevant sections of the affected documents to the RAI (e.g., DOC, JFD, ITS, CTS, etc.). The staff needs to review complete responses, including markup pages, to close the RAI or issue follow-up questions, as needed.
- For new changes in the ITS adopted throughout the conversion LAR, it will save time and resources for the associated traveler to be named in the DOCs.

Expectations for Attachments to RAI Responses:

- Every ITS markup should reference a DOC number.
- Each DOC should clearly explain how CTS becomes the ITS (i.e., a disposition of each CTS requirement and newly added/changed requirements).
- All deviations from the ISTS should have a justification for deviation (JFD).
- Removed requirements should have a discussion of why it is no longer needed and the reference (document) to where it will be relocated.
- If a technical change from CTS is related to a particular traveler, adding the traveler number to the DOC will provide efficiency in the staff's review. This only applies if a traveler is being adopted as part of this LAR.
- If a traveler is being adopted as part of this LAR, the DOC should justify the change, similarly to what was required in the model application.
 - This may be a simple statement that the traveler and associated staff's safety evaluation have been reviewed and confirmed to be applicable.
 - If the model application required additional references or other actions, those references should be provided, and the actions should be confirmed as complete.