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See Proposed Change to Tech Specs.

SUBJECT: Forwards response to NRC 990510 RAI pertaining to NMP application for amend re conversion of NMPNS Unit 2 current TS to ITS.NRC requested info re several Sections,including Section 3.6, "Containment Sys."

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AA2

Niagara Mohawk

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August 16, 1999
NMP2L 1886

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

*Subject:* ***Request for Additional Information Regarding Improved Technical Specification (ITS) Section 3.6 for the Nine Mile Point Nuclear Station, Unit No. 2 (TAC No. MA3822)***

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) transmitted an Application for Amendment regarding conversion of the Nine Mile Point Unit 2 (NMP2) Current Technical Specifications (CTS) to the ITS by letter dated October 16, 1998 (NMP2L 1830). Subsequently, by letter dated May 10, 1999, the NRC requested additional information pertaining to our Application for Amendment. The Staff requested information regarding several Sections, including Section 3.6, Containment Systems.

Attached to this letter are the required Section 3.6 responses.

Very truly yours,

Richard B. Abbott



Richard B. Abbott
Vice President - Nuclear Engineering

RBA/KWK/kap
Attachment

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A001

# REQUEST FOR ADDITIONAL INFORMATION (RAI)

# IMPROVED TECHNICAL SPECIFICATIONS (ITS)

# NIAGARA MOHAWK POWER CORPORATION

# NINE MILE POINT NUCLEAR STATION UNIT NO. 2

ITS SECTION 3.6, CONTAINMENT SYSTEMS
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT NO. 2

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*3.6.1.1-1* *DOC A.17 (CTS 1.0)*
*DOC A.2*
*CTS 1.31*
*CTS 3/4.6.1.1*
*ITS B3.6.1.1 Bases - BACKGROUND*

*CTS 1.31 defines CONTAINMENT INTEGRITY. A markup of CTS 1.31 is provided in the CTS markup of CTS 1.0, but not in the markup of CTS 3.6. DOC A.17 (CTS 1.0) and DOC A.2 in CTS 3.6 states that the definition of CONTAINMENT INTEGRITY is deleted from the CTS/ITS. In addition, DOC A.17 (CTS 1.0) and DOC A.2 in CTS 3.6 state that the definition requirements have been relocated or are addressed by the LCOs in ITS 3.6. Both of these justifications are not entirely correct. Both DOCs are incorrect in that the definition is not deleted but relocated to various Bases in ITS 3.6, which is a Less Restrictive (LA) change. DOC A.2 changes CTS 3/4.6.1.1 from maintaining CONTAINMENT INTEGRITY to the containment shall be OPERABLE. This is an Administrative change which is acceptable. See Comment Numbers 3.6.1.1-2, and 3.6.1.3-1.*

*Comment: Revise the CTS markup of CTS 1.31 to reflect the above discussion. Provide additional discussions and justifications for relocating the details of the definition to ITS B3.6.1. Bases - BACKGROUND. See Comment Numbers 3.6.1.1-2, and 3.6.1.3-1.*

Licensee Response:

The definition of PRIMARY CONTAINMENT INTEGRITY is in Current Technical Specification (CTS) Chapter 1.0, and was dispositioned in Chapter 1.0 in Discussion of Change (DOC) A.17. This disposition classifying the change as an "A" change has been reviewed and accepted by the NRC Reviewer for Chapter 1.0. This is also consistent with the most recent Boiling Water Reactor (BWR)/5 Improved Technical Specification (ITS) submittal (WNP-2). Therefore, Nine Mile Point 2 (NMP2) believes the currently approved NRC disposition is correct and no changes are necessary.

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*3.6.1.1-2* *DOC A.17 (CTS 1.0)*
*Bases JFD 1*
*CTS 1.31.f*
*STS B3.6.1.1 Bases - BACKGROUND*
*ITS B3.6.1.1 Bases - BACKGROUND*

*CTS 1.31 defines CONTAINMENT INTEGRITY. A markup of CTS 1.31 is provided in the CTS markup of CTS 1.0. DOC A.17 (CTS 1.0) states that the definition of CONTAINMENT*

*INTEGRITY is deleted from the CTS/ITS. DOC A.17 is incorrect. CTS 1.31.f states that "The sealing mechanism associated with each primary containment penetration (e.g., welds, bellows, or O-rings) is OPERABLE." STS B3.6.1.1 Bases - BACKGROUND has a similar statement defining the leak tight barrier. ITS B3.6.1.1 Bases - BACKGROUND deletes this statement based on plant specific design details (Bases JFD 1) that is not applicable to NMP-2. Since CTS 1.31.f is contained in the CTS, it needs to be included in ITS B3.6.1.1 Bases - BACKGROUND.*

*Comment: Revise ITS B3.6.1.1 Bases - BACKGROUND to include CTS 1.31.f or provide additional discussion and justification for its deletion based on system design, operational constraints, or current licensing basis.*

Licensee Response:

The statement in the Improved Standard Technical Specification (ISTS) Bases was deleted since it was referring to a pressurized sealing mechanism for the penetrations, which NMP2 does not have. The sealing mechanisms associated with each primary containment penetration (e.g., welds, bellows, or O-rings) are considered OPERABLE provided the primary containment is meeting its leakage limits (e.g., 1.0 $L_a$). This requirement is effectively covered by the statement in the 3.6.1.1 Background section of the Bases that the primary containment provides an essentially leak tight barrier against an uncontrolled release of radioactive material to the environment, and the Surveillance Requirement (SR) 3.6.1.1.1 requirement to perform leakage tests of the primary containment. However, for clarity, a statement similar to the one in the current definition will be added to the Background section of the Bases for 3.6.1.1.

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*3.6.1.1-3*

*DOC A.8*
*JFD 1*
*Bases JFD 2*
*CTS 4.6.2.1.d*
*ITS SR 3.6.1.1 and Associated Bases*

*CTS 4.6.2.1.d specifies that a visual inspection of the exposed accessible interior and exterior surfaces of the suppression chamber including each vacuum relief valve and associated piping shall be conducted at least once per 18 months. This CTS requirement is incorporated into ITS SR 3.6.1.1.1; however, the frequency of the ITS SR is in accordance with the 10 CFR 50 Appendix J Testing Program Plan, which is a performance based frequency. The visual inspections of containment are performed on the same frequency as the 10 CFR 50 Appendix J Type A Tests. The frequency of the Type A Tests according to 10 CFR 50 Appendix J Option A is approximately every 40 months (Option B starts at 40 months, but can be increased based on previous tests). Thus the change is not an Administrative change, but a Less Restrictive (L) change (frequency goes from 18 months to a minimum of 40 months).*

*Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.*

Licensee Response:

The change was submitted and categorized as an administrative change consistent with the NRC's review and approval of a recent BWR/4 ITS submittal (Brunswick 1 and 2). NMP2 understands that the NRC would prefer this change to be identified as less restrictive. Consistent with this current expectation, NMP2 will revise our submittal accordingly.

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*3.6.1.1-4* *DOC A.10*
*CTS 4.6.2.1.e.1*

*CTS 4.6.2.1.e.1 requires a Commission review and approval following any drywell-to-suppression chamber bypass leakage test failure. This requirement is not retained in ITS. DOC A.10 provides an interpretation which does not match the written text of CTS 4.6.2.1.e.1. DOC A.10 implies that test frequency is only required to be changed if two consecutive tests have failed per CTS 4.6.2.1.e.2, and since this is in the CTS/ITS and is approved by the staff, CTS 4.6.2.1.e.1 can be deleted. This is incorrect. CTS 4.6.2.1.e is performed at the same time as the 10 CFR 50 Appendix J Type A tests whose frequency is a minimum of once every 40 months. Thus, after reviewing the results of the failed test, the Commission has reserved implicitly the right to require this test at more frequent intervals such as each refueling outage (after the first test failure), rather than waiting for two consecutive test failures which could be 40 months apart. The removal of this CTS requirement is a Less Restrictive (L) change that will require a more detailed technical justification for review by the staff, and may be considered as a beyond scope of review item for this conversion.*

*Comment: This is a Less Restrictive (L) change. Provide additional justification, NSHE and revise CTS as applicable.*

Licensee Response:

The change was submitted and categorized as an administrative change consistent with the NRC's review and approval of the previous BWR/5 ITS submittal. NMP2 understands that the NRC would prefer this change to be identified as less restrictive. Consistent with this current expectation, NMP2 will revise our submittal accordingly.

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*3.6.1.1-5* *DOC A.11*
*JFD 3*
*Bases JFD 2*
*CTS 4.6.2.1.e*
*ITS SR 3.6.1.1.2 and Associated Bases*

*CTS 4.6.2.1.e.3 states that the provisions of CTS 4.0.2 do not apply when conducting the drywell-to-suppression chamber bypass leakage test. This requirement according to DOC A.11 is not retained in ITS SR 3.6.1.1.2. The bases for this deletion is that the test is performed in*

*accordance with the 10 CFR 50 Appendix J Testing Program. Even though the 10 CFR 50 Appendix J Testing Program Plan specified in CTS 6.8.4.f/ITS 5.5.12 states that CTS 4.0.2/ITS SR 3.0.2 does not apply, there is a second frequency associated with CTS 4.6.2.1.e to which CTS 4.6.1.2.1.e.3 applies that is the frequency of every refueling outage specified in CTS 4.6.2.1.e.2. This frequency changed to 24 months in the CTS markup is the second frequency associated with ITS SR 3.6.1.1.2. See Comment Numbers 3.6.0-1 and 3.6.1.1-6. Because this second frequency is specified in ITS SR 3.6.1.1.2 with no CTS 4.0.2 restriction associated with it, the 24 month frequency may be extended by 25% as permitted by ITS SR 3.0.2. This is unacceptable. ITS SR 3.6.1.1.2 needs to retain the requirements of CTS 4.6.2.1.e.3 for the second frequency.*

*Comment: Revise the CTS/ITS markup to show the retention of CTS 4.6.2.1.e.3 and provide the appropriate discussion and justification for this Administrative change. See Comment Numbers 3.6.0-1 and 3.6.1.1-6.*

Licensee Response:

CTS 4.6.2.1.e requires a drywell-to-suppression chamber bypass leak test to be performed in accordance with the criteria specified in the 10 CFR 50 Appendix J Testing Program Plan. CTS 4.6.2.1.e.1, 2, and 3 all modify the requirements of CTS 4.6.2.1.e; they are not stand alone requirements nor do they modify each other. As such, CTS 4.6.2.1.e.3, which states that the provisions of CTS 4.0.2 do not apply, is not applicable to the modification of the CTS 4.6.2.1.e requirements provided in CTS 4.6.2.1.e.2, nor does it apply to the test schedule review and approval requirements in CTS 4.6.2.1.e.1. Likewise, as implied in RAI 3.6.1.1-4, CTS 4.6.2.1.e.2 does not apply to CTS 4.6.2.1.e.1. Therefore, since the Frequency in CTS 4.6.2.1.e.2 has no CTS 4.0.2 restrictions, it is acceptable to extend the Frequency by 25% as allowed in CTS 4.0.2 and ITS SR 3.0.2. Thus, no changes to the CTS/ISTS markups are necessary since the deletion of CTS 4.6.2.1.e.3 is not a less restrictive change. However, DOC A.11 will be modified to more clearly state that CTS 4.6.2.1.e.3 only applies to CTS 4.6.2.1.e.

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*3.6.1.1-7* *DOC L.2*
*CTS 3.0.3*
*CTS 3.6.1.1 ACTIONS*
*CTS 3.6.2.1 ACTIONS*
*ITS 3.6.1.1 ACTIONS*

*CTS 3.6.2.1 ACTIONS restrict reactor coolant heat up beyond 200 °F if the drywell-to-suppression chamber bypass leakage rates are outside established limits. The CTS markup of CTS 3.6.2.1 changes this requirement to ITS 3.6.1.1 ACTIONS A and B. This change is characterized as a Less Restrictive (L) change since the CTS ACTIONS are non-specific as to the appropriate required actions and ITS 3.6.1.1 ACTION A's Completion Time of 1 hour is less restrictive than CTS requirements. This change is incorrect. As currently written in the CTS markup, no remedial actions are provided if the reactor coolant temperature is >200 ° (Mode 3) and the drywell-to-suppression-chamber bypass leakage rates are outside established*

*limits. In this case, CTS 3.0.3 or CTS 3.6.1.1 ACTIONS are to be entered since they are equivalent. Because ITS 3.6.1.1 ACTIONS are the same as both CTS 3.6.1.1 ACTIONS and CTS 3.0.3, the replacement of these CTS ACTION requirements by the ACTIONS of ITS 3.6.1 is an Administrative Change not a Less Restrictive (L) change.*

*Comment: This is an Administrative Change. Revise the DOC and CTS appropriately.*

Licensee Response:

The CTS 3.0.3 Actions and the CTS 3.6.1.1 Actions are not equivalent. CTS 3.0.3 requires a shutdown to be initiated within 1 hour, and the unit to be placed in STARTUP (MODE 2) within the next 6 hours (7 hours total), HOT SHUTDOWN (MODE 3) within the following 6 hours (13 hours total), and COLD SHUTDOWN within the subsequent 24 hours (37 hours total). CTS 3.6.1.1 Actions do not require entry into MODE 2, only entry into MODE 3 and MODE 4. Therefore, CTS 3.0.3 is more restrictive than CTS 3.6.1.1 Actions. Thus, since CTS 3.0.3 must be entered when the requirements of CTS Limiting Condition of Operation (LCO) 3.6.2.1.b are not met and the temperature is above 200 degrees F, ITS 3.6.1.1 ACTION A is less restrictive than the current requirements. Therefore, NMP2 believes the current L.2 DOC and NSHE are correct.

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*3.6.1.1-8* *JFD 1*
*Bases JFD 2*
*Bases JFD 5*
*CTS 4.6.1.1.a*
*CTS 4.6.1.1.c*
*CTS 3/4.6.1.2*
*CTS 4.6.2.1.e*
*STS SR 3.6.1.1.1*
*ITS SR 3.6.1.1.1, SR 3.6.1.1.2 and Associated Bases*

*CTS 4.6.1.1a and c, 3/4.6.1.2 and 4.6.2.1.e require leak rate testing in accordance with the 10 CFR 50 Appendix J Testing Program Plan which is based on the requirements of 10 CFR 50 Appendix J, Option B. 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 4.6.1.1a and c and 3/4.6.1.2 as modified in the CTS markup. The STS is based on Appendix J, Option A while the CTS and 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, as modified by staff comments 10/96 and 12/98. While the changes to ITS 3.6.1.1 and ITS 3.6.1.2 are in conformance with the above documents, the changes to ITS 3.6.1.3 and the Bases associated with ITS 3.6.1.1, ITS 3.6.1.2 and ITS 3.6.1.3 are not in conformance with the letter and TSTF-52 as modified by staff comments. See Comment Numbers 3.6.1.2-4 and 3.6.1.3-14.*

*Comment: Licensee should revise its submittal to conform to the 11/2/95 letter and TSTF-52 modified by the staff. See Comment Numbers 3.6.1.2-4 and 3.6.1.3-14.*

Licensee Response:

During the development of the NMP2 ITS, NMP2 used proposed Technical Specification Task Force (TSTF)-52, Rev. 1 to modify the ISTS Bases, since Rev. 1 came after and superseded the November 2, 1995 letter. NMP2 has reviewed proposed TSTF-52, Rev. 1 and determined that the NMP2 ITS 3.6.1.1 Bases is consistent with the TSTF, except for editorial changes made to achieve consistency with plant specific terminology, two typographical errors, and a location where the title of the plant-specific leakage plan was missing. The submittal will be revised to make appropriate corrections.

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*3.6.1.2-1 DOC L.3*
*CTS 3.6.1.3 ACTIONs a.1 and c*
*ITS 3.6.1.2 Required Actions A.1 and C.2*

*CTS 3.6.1.3 ACTION a.1 and c requires that with an airlock door or airlock inoperable that at least one airlock door be maintained closed. The CTS markup indicates through DOC L.3 that the word "maintain" is changed to "verify" and one hour is allowed to complete this verification. The change is characterized as a Less Restrictive (L) change. The justification (DOC L.3) does not provide sufficient information to conclude that the change is a Less Restrictive (L) change. However, because no time limit is specified in the CTS other than the "within 24 hours" to lock the OPERABLE airlock door closed or restore the inoperable airlock to OPERABLE status, the staff concludes that the change is a More Restrictive change.*

*Comment: Revise the CTS markup and provide a discussion and justification for this More Restrictive change.*

Licensee Response:

CTS 3.6.1.3 Action a.1 requires, with one air lock door inoperable, the other OPERABLE door must be maintained closed. NMP2 believes that maintaining the remaining OPERABLE door closed is an immediate requirement since no time is provided in the Action. If the other door is not OPERABLE and closed, then Action a.3 must be taken, which requires a shutdown. ITS 3.6.1.2 ACTION A allows 1 hour to ensure an OPERABLE door is closed when one air lock door is determined inoperable. This new allowance is less restrictive than the current requirements. For clarity, DOC L.3 will be modified to clarify that the CTS word "maintain" is an immediate action.

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*3.6.1.2-4 Bases JFD 1*
*Bases JFD 5*
*ITS B3.6.1.2 Bases - LCO and SR 3.6.1.2.1*

*See Comment Number 3.6.1.1-8*

*Comment: See Comment Number 3.6.1.1-8*

Licensee Response:

During the development of the NMP2 ITS, NMP2 used proposed TSTF-52, Rev. 1 to modify the ISTS Bases, since Rev. 1 came after and superseded the November 2, 1995 letter. NMP2 has reviewed proposed TSTF-52, Rev. 1 and determined that the NMP2 ITS 3.6.1.2 Bases is consistent with the TSTF, except for editorial changes made to achieve consistency with plant specific terminology and typographical errors. Therefore, no changes to CTS 3.6.1.2 are necessary.

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*3.6.1.2-5 Bases JFD 3*
*STS B3.6.1.2 Bases - ACTIONS*
*ITS 3.6.1.2 ACTIONS Note 1 and Associated Bases*

*ITS 3.6.1.2 ACTIONS Note 1 states that entry and exit is permissible to perform repairs of the affected air lock components. The first paragraph in ITS B3.6.1.2 Bases - ACTIONS provides a discussion on the intent of this Note. The ITS modifies this discussion based on editorial changes made for enhanced clarity (Bases JFD 3). The staff does not agree that the changes are editorial nor do they enhance clarity, but change the meaning of the discussion. The first change is to the second sentence. The STS words "may be easily accessed for most repairs" has been changed in the ITS to "may be accessed to repair." The STS wording states that if the other air lock door is inoperable, most but not all repairs can be made from outside the airlock. The ITS change implies that all repairs can be made from outside the airlock. The second ITS change is to the fourth sentence. The STS words "(during access through the OPERABLE door)" has been changed in the ITS to "(during access through the OPERABLE outer door). "The STS words do not imply which door (inner or outer) is inoperable or OPERABLE, while the ITS words specifically limits the OPERABLE door to the outer door, thus the inner may never be repaired.*

*Comment: Delete these changes.*

Licensee Response:

NMP2 changed the words because it was believed that if the outer door were inoperable, all repairs on the outer door could be performed without the need to enter the airlock from the inner door side. However, for consistency with the ISTS Bases, the ISTS Bases words will be maintained.

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*3.6.1.2-6* *CTS 4.6.1.3.c*
*STS SR 3.6.1.2.3 and Associated Bases*
*ITS SR 3.6.1.2.2 and Associated Bases*

*STS SR 3.6.1.2.3 requires verifying only one door in the airlock will open at a time at six month intervals. The interval is modified in 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.*

*Comment: Revise the ITS Bases to be in accordance with TSTF-17 or justify the deviations.*

Licensee Response:

NMP2 made two editorial changes concerning the TSTF-17, Rev. 1 Bases change, consistent with the most recent BWR/5 ITS submittal. The changes were not specifically identified and justified by a Justification for Deviation (JFD), since they were editorial in nature, and the NRC had previously accepted the changes without specific JFDs in the most recent BWR/5 ITS submittal. The first change was to TSTF-17, Rev. 1, Insert B. The Insert B stated that "The 24 month Frequency for the interlock is justified based on generic operating experience." This type of statement is not worded this way anywhere else in the ISTS Bases. The words were changed in the NMP2 ITS Bases to "Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency." The proposed words are consistent with numerous other similar statements in the ISTS Bases. The second change was to correct a typographical error in TSTF-17, Rev. 1, Insert C. The Insert used the word "airlock" instead of "air lock." For clarity, the JFDs will be provided for both of these changes.

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*3.6.1.3-1* *DOC A.17 (CTS 1.0)*
*DOC A.2 (ITS 3.6.1.1)*
*CTS 1.31*
*CTS 3/4.6.1.1*
*ITS 3.6.1.3 and Associated Bases*

*See Comment Number 3.6.1.1-1.*

*Comment: See Comment Number 3.6.1.1-1.*

Licensee Response:

See the NMP2 response to RAI 3.6.1.1-1.

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*3.6.1.3-2* *DOC A.2*
*DOC A.3*
*DOC L.5*
*JFD 1*
*Bases JFD 6*
*Bases JFD 7*
*CTS 3.4.7 ACTIONS*
*CTS 3.6.1.7 ACTIONS*
*CTS 3.6.3 ACTIONS*
*ITS 3.6.1.3 ACTION Notes and Associated Bases*

*The CTS markup of CTS 3/4.6.3 adds four Notes to CTS 3.6.3 Actions. The markup justifies the addition of these Notes. The CTS markup of CTS 3/4.6.1.7 and 3.4.7 do not show the addition of the four Notes to the Actions of CTS 3.6.1.7 and 3.4.7. Based on the structure and format of the CTS markup these Notes need to be added to the markups of CTS 3/4.6.1.7 and 3/4.4.7 because they also apply to these CTS. The justifications used to add these Notes to CTS 3.6.3 were based on CTS 3.6.3 and therefore they may not be applicable to CTS 3.6.1.7 and 3/4.4.7. See Comment Number 3.6.1.3-5.*

*Comment: Revise the CTS markup of CTS 3/4.6.1.7 and 3.4.7 to add the four ITS ACTION Notes and provide the appropriate discussion and justification for these changes. See Comment Number 3.6.1.3-5.*

Licensee Response:

Only ITS 3.6.1.3 ACTIONS Notes 1 and 2 are applicable to CTS 3.4.7 and only ITS 3.6.1.3 ACTIONS Notes 1, 2, and 4 are applicable to CTS 3.6.1.7. ITS 3.6.1.3 ACTIONS Note 3 is not applicable to CTS 3.4.7 and CTS 3.6.1.7 since no additional "systems" are made inoperable by closing Main Steam Isolation Valves (MSIVs) or purge valves. ITS 3.6.1.3 ACTIONS Note 4 is not applicable to CTS 3.4.7 since there is no leakage limit in CTS 3.4.7. Appropriate CTS markup and DOC changes will be made.

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*3.6.1.3-4* *DOC M.3*
*DOC L.15*
*JFD 5*
*JFD 8*
*Bases JFD 3*
*Bases JFD 7*
*CTS 3.6.1.7 ACTION a and Associated Footnote*
*CTS 4.6.1.7*
*STS SR 3.6.1.3.2 and Associated Bases*
*ITS SR 3.6.1.3.1 and Associated Bases*

*CTS 4.6.1.7 has been modified by the addition of ITS SR 3.6.1.3.1. ITS SR 3.6.1.3.1 Note 2 modifies STS SR 3.6.1.3.2 Note 2 to reflect the requirements specified in the Footnote*

*associated with CTS 3.6.1.7 ACTION a. The proposed modification does not reflect the requirements specified in the Footnote associated with CTS 3.6.1.7 ACTION a. The staff believes that the "or" between conditions "a" and "b" should be an "and" and that the phrase "and one SGT subsystem is OPERABLE" should be deleted since the CTS requires suspension of venting/purging if one SGT is inoperable. The proposed Note would not require this. In addition, the deletion of the STS phrase "The drywell [purge supply and exhaust] lines are isolated" is not properly justified. The justification used for this deletion (JFD 5) has nothing to do with the purge valves.*

*Comment: Revise the ITS markup to correctly reflect the CTS requirements and provide the appropriate discussions and justifications for this change.*

Licensee Response:

The CTS does not require suspension of all venting and purging if one Standby Gas Treatment (SGT) subsystem is inoperable. CTS 3.6.5.3 Action a.1, footnote **, allows venting and purging to continue, provided 2GTS*AOV101 is closed. 2GTS*AOV101 is the valve that isolates the full flow line to the SGT System. With this line isolated, purging can continue with the 12 and 14 inch purge valves open. This is provided in condition b of the ITS SR 3.6.1.3.1 Note. Purging through all lines is only restricted when both SGT subsystems are inoperable, as stated in CTS 3.6.5.3 Action b.1. The ITS SR 3.6.1.3.1 Note allows the 12 and 14 inch valves to be open provided either the SGT System is OPERABLE (which means both SGT subsystems are OPERABLE), or one SGT subsystem is OPERABLE and the full flow line to the SGT System is isolated. With the full flow line isolated, the only purge path available is the 2 inch bypass line. Therefore, the ITS SR 3.6.1.3.1 Note is consistent with the current licensing basis requirements for when the purge valves can be open. The deletion of the ISTS phrase "The drywell [purge supply and exhaust] lines are isolated" should be justified using JFD 8; the same justification that added in the CTS requirements discussed above. The ISTS markup will be corrected.

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*3.6.1.3-5 DOC L.5*
*CTS 3.6.3 and Associated ** Footnote*
*CTS 3.6.3 ACTIONS and Associated* Footnote*
*ITS 3.6.3 ACTION Note 1, SR 3.6.1.3.2, SR 3.6.1.3.3 and Associated Bases*

*The footnote associated with CTS 3.6.3 and 3.6.3 ACTIONS allow closed or locked, or sealed closed PCIVs to be opened intermittently under administrative controls. The requirements become Note 1 to ITS 3.6.1.3 ACTIONS and Note 2 to ITS SR 3.6.1.3.2 and SR 3.6.1.3.3. The change is characterized as a Less Restrictive (L) change. This is incorrect. This change for CTS 3.6.3 ACTIONS is an Administrative change, since there is no change in requirements only in location.*

*Comment: Revise the CTS markup and provide a discussion and justification for this Administrative change.*

Licensee Response:

CTS LCO 3.6.3 footnote ** only allows locked or sealed closed valves to be opened on an intermittent basis under administrative controls. It does not allow closed, unlocked valves to be opened on an intermittent basis under administrative controls. Note 2 to ITS SR 3.6.1.3.2 and ITS SR 3.6.1.3.3 provides this allowance. This is described in DOC L.5 and is a less restrictive change. CTS 3.6.3 Action footnote * allows valves closed to comply with CTS 3.6.3 Action a.2 or a.3 to be reopened on an intermittent basis under administrative control. It does not allow valves closed to comply with CTS 3.6.3 Action b to be reopened. In addition, CTS 3.4.7 and CTS 3.6.1.7 do not allow valves closed to comply with the associated Actions to be reopened. Note 1 to the ITS 3.6.1.3 ACTIONS provides this allowance. This is described in DOC L.5 and is a less restrictive change. Therefore, since both the described changes are less restrictive, no reclassification of the current DOC is required.

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*3.6.1.3-6* *DOC L.7*
*CTS 4.6.3.2*
*ITS SR 3.6.1.3.8 and Associated Bases*

*CTS 4.6.3.2 requires an automatic valve test at least once per 18 months during cold shutdown or refueling. ITS SR 3.6.1.3.8 requires the same test on a frequency of 24 months. See Comment Number 3.6.0-1 and 3.6.1.3-3. The CTS markup shows that the test frequency detail of "during COLD SHUTDOWN or REFUELING" as being relocated to a licensee-controlled document that is not under regulatory program controls. The justification is incorrect. The details on when the test is to be performed are found in the Bases for ITS SR 3.6.1.3.8. The description in the Bases would require the test be performed during cold shutdown or refueling, thus the change is a Less Restrictive (LA) change rather than a Less Restrictive (L) change.*

Comment: *This information is relocated to ITS B3.6.1.3 Bases - SR 3.6.1.3.8, and the change is a Less Restrictive (LA) change. Revise DOC L.7 appropriately.*

License Response:

The description in the Bases states "The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power." The term "plant outage" is not equivalent to "COLD SHUTDOWN or REFUELING." The two defined terms equate specifically to MODES 4 and 5; i.e., for MODE 4, reactor mode switch in shutdown, reactor coolant temperature less than or equal to 200 degrees F, and fuel in the vessel with all reactor head closure bolts fully tensioned, and for MODE 5, reactor mode switch in shutdown or refueling and fuel in the reactor vessel with one or more reactor vessel head closure bolts less than fully tensioned. The term "plant outage" applies to any time the reactor is shutdown; i.e., MODE 3, 4, or 5, or the reactor defueled. Therefore, this CTS requirement is not being proposed to be relocated to the Bases. In addition, Generic Letter 91-04 did not require these special restrictions to be relocated to the Bases when they are removed

from the Technical Specifications. This allowance to delete this specific restriction from the Technical Specifications and allow it to be placed in a licensee-controlled document that is not under regulatory program controls was also approved by the NRC for the most recent BWR/5 ITS submittal. Therefore, NMP2 believes this change should remain a less restrictive change.

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*3.6.1.3.7* ***DOC L.9***
***JFD 5***
***Bases JFD 7***
***CTS 4.6.3.4***
***ITS SR 3.6.1.3.9 and Associated Bases***

*CTS 4.6.3.4 verifies that each EFCV is OPERABLE by "verifying that the valve checks flow." The corresponding ITS SR 3.6.1.3.9 verifies that each EFCV activates to its isolation position. The "checks flow" in CTS 4.6.3.4 implies that the flow is stopped with no leakage. The "activates to its isolation position" in ITS SR 3.6.1.3.9 only verifies that the EFCV closes, it does not imply that there is no leakage. A closed valve can leak. The justification provided for this Less Restrictive change. (DOC L.9) does not provide sufficient information to evaluate this change, and based on the information provided, it can be considered as a change in the current licensing basis. Thus it would be considered as a beyond scope of review item for this conversion. It should be noted that the corresponding STS SR in NUREG 1433 does allow some leakage.*

*Comment: Delete this change.*

Licensee Response:

NMP2 does not agree that the term "checks flow" implies that there is no leakage. "Checks flow" simply means that when the valve closes, flow through the valve decreases. The design of the excess flow check valves (EFCVs) is not to have zero leakage when closed; it is only designed to decrease most of the flow through the valve. As described in DOC L.9, the requirements for the EFCVs are provided in 10 CFR 50 Appendix A, GDCs 55 and 56, and in Regulatory Guide (RG) 1.11. These requirements state that there should be a high degree of assurance that the EFCVs will close or be closed if the instrument line outside containment is lost during normal reactor operation, or under accident condition. The proposed SR ensures this requirement, since it requires the EFCV to isolate to the isolation position (i.e., closed) on an instrument line break signal. The CTS requirement does not specifically require the valve to close fully, just to "check flow." Thus, the proposed ITS SR 3.6.1.3.9 ensures the Regulatory Guide 1.11 requirement is met. In addition, DOC L.9 further states that the Updated Safety Analysis Report (USAR) analysis of an instrument line break does not even assume the valve goes closed; a specific leakage limit is not an assumption in the analysis. In addition, a similar change, using a similar DOC, was approved by the NRC for the most recent BWR/5 ITS submittal. Therefore, NMP2 believes sufficient information is provided in

DOC L.9 to justify the change. Additionally, this issue was identified as a beyond-beyond in our submittal and is being handled by the NRC Project Manager.

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*3.6.1.3-8* *DOC L.10*
*JFD 4*
*Bases JFD 7*
*CTS 4.6.1.1.b and Associated** Footnote*
*ITS SR 3.6.1.3.3 and Associated Bases*

*CTS 4.6.1.1.b verifies that all primary containment penetrations not capable of being closed by OPERABLE automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their closed position on a 31 day frequency except valves that are locked, sealed or otherwise secured in the closed position and are inside containment. These valves are verified during COLD SHUTDOWN except such verification need not be performed when the primary containment has not been de-inerted since the last verification or more often than once every 92 days. The corresponding ITS SR for this CTS surveillance (valves inside containment) is ITS SR 3.6.1.3.3. DOC L.10 justifies changing "locked, sealed..." requirement to "not locked, sealed...," but it does not address the change in frequency from 31 days for valves inside containment that are not locked, sealed or otherwise secured in the closed position to the CTS/ITS frequency of "prior to entering MODE 2...previous 92 days." This change is a Less Restrictive (L) change. See Comment Numbers 3.6.1.3-9 and 3.6.1.3-13.*

*Comment: Provide additional discussion and justification for this Less Restrictive (L) change. See Comment Numbers 3.6.1.3-9 and 3.6.1.3-13.*

Licensee Response:

NMP2 does not have any primary containment penetrations that are not capable of being closed by OPERABLE automatic Primary Containment Isolation Valves (PCIVs), whose PCIVs are located inside the primary containment and not locked, sealed or otherwise secured in the closed position. All manual PCIVs inside the primary containment are locked, sealed or otherwise secured in the closed position. Therefore, there is no change in Frequency associated with this change, and an "L" DOC is not necessary. While it is noted that the NMP2 design is such that no PCIVs are required to be checked by ITS SR 3.6.1.3.3, the SR was not deleted in case the NMP2 design is changed (following the appropriate change control process; i.e., 10 CFR 50.59) such that the SR becomes necessary (i.e., a PCIV inside primary containment is not locked, sealed, or otherwise secured in the closed position).

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*3.6.1.3-9* *DOC L.10*
*Bases JFD 7*
*CTS 4.6.1.1.b and Associated** Footnote*
*ITS SR 3.6.1.3.2, SR 3.6.1.3.3 and Associated Bases*

*CTS 4.6.1.1.b, its Associated** Footnote, ITS SR 3.6.1.3.2 and ITS SR 3.6.1.3.3 have been modified to exclude those valves which are locked, sealed or otherwise secured from the closure verification. This change implements TSTF-45. While the change to the ITS SRs is in accordance with the TSTF, the Bases changes are not in accordance with TSTF-45.*

*Comment: Licensee should revise its submittal to conform to TSTF-45.*

Licensee Response:

NMP2 inadvertently had a typo in ITS SR 3.6.1.3.2 and left out a phrase in ITS SR 3.6.1.3.3. The submittal will be revised to correct this oversight. TSTF-45 included an insert that added the sentence "This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing" to the Bases for ISTS SR 3.6.1.3.3 and ISTS SR 3.6.1.3.4. When adopting these TSTF words in ITS SR 3.6.1.3.2 and ITS SR 3.6.1.3.3, NMP2 added the words "and blind flanges" between the words "valves" and "that" since the actual SR allowance added by TSTF-45 is applicable to both valves and blind flanges. Since this proposed NMP2 wording is correct, and without this change the TSTF-45 wording would conflict with the actual SR allowance, NMP2 is not revising the submittal to conform exactly to TSTF-45 words for this specific sentence.

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*3.6.1.3-10* *DOC L.12*
*JFD 3*
*JFD 7*
*Bases JFD 1*
*Bases JFD 4*
*Bases JFD 7*
*Bases JFD 13*
*CTS 3.6.1.2 ACTIONS*
*STS 3.6.1.1 ACTIONS*
*STS 3.6.1.3 ACTIONS A, B, C, and D*
*ITS 3.6.1.1 ACTIONS*
*ITS 3.6.1.3 ACTIONS A, B, C, D, and Associated Bases*

a. *STS 3.6.1.3 ACTION D has been modified in ITS 3.6.1.3 ACTION D to reflect what the licensee states is potential inconsistencies between valve leakage and inoperability. Three changes have been made to STS 3.6.1.3 ACTION D; they are changes associated with (1) secondary containment bypass leakage, (2) main steam isolation valve (MSIV) leakage, and (3) hydrostatic tested valve leakage. The changes associated with changes 1 and 2 are encompassed by TSTF-207 Rev O. See Comment Number 3.6.1.3-11 for concerns on TSTF-207 Rev O changes. With regards to the changes associated with the hydrostatically tested valve leakage, the hydrostatic test leakage is considered as part of the 10 CFR 50 Appendix J Type B and C leakage and thus is covered by STS 3.6.1.1 ACTIONS and 3.6.1.3 ACTION A, B, and C for PCIVs. This change has been proposed as TSTF-207 Rev 1. In TSTF-207 Rev 1 the 72 hour Completion Time pre-*

*supposed that the hydrostatically tested valves are in penetrations with single valves and a closed system, thus the Completion Time is based on STS ACTION C as revised by TSTF 30. 10 CFR 50 Appendix J Option A and B do not limit the Type B and C hydrostatic tests that are done to just those penetrations in a closed system with a single valve. Thus this change would allow additional time (72 hours versus 4 hours) for penetrations with two valves that are hydrostatically tested. DOC L.10 states that some of the hydrostatically tested valves are in penetrations with two valves. TSTF-207 Rev 1 and DOC L.10 do not justify this change (4 hours to 72 hours). For this and other reasons, the staff has rejected this portion of TSTF-207 Rev.1. These changes and the changes made to ITS B3.6.1.3 Bases -D.1 are not in accordance with TSTF-207 Rev O.*

*Comment: Delete these generic changes discussed in paragraph a. above. Licensee should revise its submittal to conform to TSTF-207 Rev O.*

Licensee Response:

TSTF-207, Rev. 3 has recently been provided to the NRC for review and approval. NMP2 will revise the submittal to be consistent with this revision, except where plant specific differences apply or where typographical/consistency errors are noted.

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*3.6.1.3-12* *DOC L.12*
*JFD 16*
*Bases JFD 7*
*CTS 3.6.1.7.a*
*CTS 3.6.1.7 ACTION b*
*ITS 3.6.1.3 ACTION E and Associated Bases*

*CTS 3.6.1.7.a and ACTION b requires excessive leaking purge supply and exhaust valves to be restored to OPERABLE status within 24 hours. ITS 3.6.1.3 ACTION E only applies to the purge exhaust valves. No ACTIONS are provided for the purge supply valves. DOD L.12 implies but does not state explicitly that the ITS 3.6.1.3 ACTION D applies because the valves are considered secondary containment bypass leakage paths. This is, however, is stated in JFD 16. If this is the case then the change would be a More Restrictive change not a Less Restrictive (L) change (24 hours to 4 hours) and either ITS 3.6.1.3 ACTION D or its Associated Bases needs to be changed to reflect this. However, the staff cannot determine based on the Bases discussions, the DOCs and the JFDs how the supply purge valve system differs from any other BWR supply purge system such that it would be considered as a secondary containment bypass leakage path. Furthermore, if the supply purge system is a secondary bypass leakage path why isn't the exhaust also a potential bypass leakage path.*

*Comment: Revise the CTS/ITS markup and provide additional discussion and justification for the changes.*

Licensee Response:

The purge supply lines are secondary containment bypass leakage pathways since there is a flow path from the primary containment directly to the outside environment. The purge exhaust lines are not secondary containment bypass leakage pathways since there is no flow path from the primary containment directly to the outside environment; all pathways lead to the SGT System, which filters the air before release to the environment. ITS SR 3.6.1.3.11 requires verification that the leakage rate for secondary containment bypass leakage paths is within the limits of Table 3.6.1.3-1, and ITS Table 3.6.1.3-1 provides the leakage rate limits for the purge supply valves (2CPS*AOV104, 105,106, 107 are the purge supply valves). Therefore, when purge supply valve leakage is not within limits, ITS 3.6.1.3 ACTION D is entered. DOC L.12 states that when leakage is not within limits, three different LCO Actions must be entered. CTS 3.6.1.2 Action (Restore) d requires restoration of the leakage to within limits, but does not provide a finite Completion Time. CTS 3.6.1.1 Action (which must be entered since the leakage rate from the purge supply valves is considered in the current definition of PRIMARY CONTAINMENT INTEGRITY), requires restoration within 1 hour. CTS 3.6.1.7 Action b requires the purge supply valve leakage to be restored within 24 hours. Since all three Actions must be entered, the most restrictive of the three is the governing one. Thus, since ITS 3.6.1.3 ACTION D now allows 4 hours to restore the leakage, this change from 1 hour to 4 hours to restore the purge supply valve leakage to within limits is a less restrictive change. However, DOC L.12 will be modified to clarify that purge supply valve leakage is a secondary containment bypass leakage pathway.

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*3.6.1.3-13* *JFD 6*
*Bases JFD 7*
*CTS 4.6.1.1.b and Associated ** Footnote*
*STS 3.6.1.3 ACTION C*
*ITS 3.6.1.3 ACTION C and Associated Bases*

*CTS 4.6.1.1.b and its Associated** Footnote are being incorporated into ITS 3.6.1.3 ACTION C. STS 3.6.1.3 Required Action C.2 and its associated Completion Times has been modified in ITS 3.6.1.3 Required Action C.2 , and its associated Completion Times to account for penetrations in closed systems with a single valve either inside containment or outside containment. No justification is provided for the change associated with valves inside containment. Based on CTS 4.6.1.1.b and the discussion in Comment Number 3.6.1.3-8 this change would be a Less Restrictive (L) change. In addition, the change may be generic and may already be covered by ITS 3.6.1.3 Required ACTION C.2 Note 1. See Comment Number 3.6.1.3-20 for additional concerns which may impact this change.*

*Comment: Revise the CTS/ITS markup and provide additional discussion and justification on this Less Restrictive (L) change to show that it is plant specific and that there are penetrations with single valves inside containment. See Comment Numbers 3.6.1.3-8 and 3.6.1.3-20.*

Licensee Response:

NMP2 has reviewed this proposed change and determined that it is not necessary, since NMP2 does not have any PCIVs inside primary containment in penetrations that have a single PCIV. Therefore, the ITS submittal will be revised to delete this allowance.

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*3.6.1.3-14* *JFD 8*
*Bases JFD 2*
*STS SR 3.6.1.3.9, SR 3.6.1.3.11, and Associated Bases*
*ITS SR 3.6.1.3.11, SR 3.6.1.3.13 and Associated Bases*

*See Comment Number 3.6.1.1-8.*

*Comment: See Comment Number 3.6.1.1-8.*

Licensee Response:

During the development of the NMP2 ITS, NMP2 used proposed TSTF-52, Rev. 1 to modify the ISTS Bases, since Rev. 1 came after and superseded the November 2, 1995 letter. NMP2 has reviewed proposed TSTF-52, Rev. 1 and determined that the NMP2 ITS 3.6.1.3 Bases is consistent with the TSTF, except for editorial changes made to achieve consistency with plant specific terminology and an addition to ISTS SR 3.6.1.3.11 that provided the acceptance criteria. This was not added since the acceptance criteria are already specified in the actual SR and, thus it does not need to be repeated in the Bases. Therefore, no changes to ITS 3.6.1.3 are necessary.

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*3.6.1.3-15* *Bases JFD 3*
*ITS B3.6.1.3 Bases - BACKGROUND*

*The second paragraph of ITS B3.6.1.3 Bases - BACKGROUND is modified by the phrase "(which includes plugs, caps, and other suitable closure devices)." The justification provided for this change (Bases JFD 3) does not provide sufficient information with regards to the acceptability of these items as isolation devices. A similar type change was proposed in TSTF-196 which was rejected by the staff. See Comment Numbers 3.6.1.3-22, 3.6.4.2-4 and 3.6.4.2-8.*

*Comment: Delete this change. See Comment Numbers 3.6.1.3-22, 3.6.4.2-4 and 3.6.4.2-8.*

Licensee Response:

The NMP2 design includes plugs, caps, and other suitable devices that isolate primary containment penetrations. These types of devices perform a similar function as a blind flange. CTS 4.6.1.1.b requires verification that primary containment penetrations not capable of being

isolated by Operable automatic valves are isolated by manual valves, blind flanges, or deactivated automatic valves in the closed position. For the penetrations isolated by plugs, caps, and other suitable devices, it is the NMP2 position that CTS 4.6.1.1.b can be met using these plugs, caps, and other suitable devices, since NMP2 interprets that the term blind flanges includes these plugs, caps, and other suitable devices. The plugs, caps, and other suitable devices are within the leak rate test boundaries of the penetration, thus they are leak rate tested. For consistency with current design and practice, and to ensure no misinterpretation occurs in the future as to the acceptability of using these devices, NMP2 added clarifying words to the Bases that the term blind flange also includes plugs, caps, and other suitable devices. To ensure only the proper plugs, caps, and other suitable devices are used to meet ITS 3.6.1.3, the Bases will be modified to state that the plugs, caps, and other suitable devices are listed in the Technical Requirements Manual (TRM). The TRM is the location where the list of PCIVs is to be located, and changes to it are controlled by 10 CFR 50.59 (since the TRM will be referenced in the USAR). In addition, the term "other suitable devices" will be deleted from the Bases since the other suitable devices fall under the general term of a plug or a cap.

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*3.6.1.3-17 Bases JFD 3*
*ITS B3.6.1.3 Bases - SR 3.6.1.3.11*

*ITS B3.6.1.3 Bases - SR 3.6.1.3.11 is modified by "Insert SR 3.6.1.3.11." Insert - SR 3.6.1.3.11 states in part "...actions are required to be taken in accordance with ACTION C." ITS 3.6.1.3 ACTION C has nothing to do with MSIV leakage. ITS 3.6.1.3 ACTION D would be the appropriate ACTION reference.*

*Comment: Correct this discrepancy.*

Licensee Response:

This typographical error will be corrected.

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*3.6.1.3-18 Bases JFD 7*
*STS B3.6.1.3 Bases - SR 3.6.1.3.2*
*ITS B3.6.1.3 Bases - SR 3.6.1.3.1*

*STS B3.6.1.3 Bases - SR 3.6.1.3.2 states the following: "If a purge valve is open...inoperable. If the inoperable valve...limits." ITS B3.6.1.3 Bases - SR 3.6.1.3.1 deletes these sentences. The justification used (Bases JFD 7) states the deletion reflects changes made to the specification. No such changes have been made to the specification which would allow the deletion of these sentences. In addition, the sentences are valid for NMP-2.*

*Comment: Delete this change.*

Licensee Response:

The proper justification is JFD 12. The ISTS Bases markup will be corrected to indicate this. The statements are not needed in the Bases and could lead to misinterpretation of similar Surveillance Requirements. The Bases words that were deleted essentially state that if a purge valve is open when it is not allowed to be open, then the purge valve is inoperable. However, just because the purge valve is open does not mean the purge valve's leakage must be also considered not within limit. These words are essentially true for other automatic PCIVs that have individual leakage limits and are inoperable due to being unable to close within the assumed time. For example, ITS SR 3.6.1.3.7 requires the full closure time of the MSIVs to be verified within limits. However, when the time cannot be met (e.g., as in the case when the MSIV will not close), the MSIV leakage limit is not assumed to be not met; only the MSIV is considered inoperable. The Bases for ITS SR 3.6.1.3.7 does not have similar statements in it concerning this issue, even though it is identical to the purge valve case. Therefore, since the statements did not appear to be needed in ITS SR 3.6.1.3.1 Bases, and similar words did not appear to be in all the places to which it is applicable, the statements were deleted.

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*3.6.1.3-19* *JFD 2*
*Bases JFD 7*
*STS SR 3.6.1.3.10 and Associated Bases*
*ITS SR 3.6.1.3.12 and Associated Bases*

*STS B3.6.1.3 Bases-SR 3.6.1.3.10 describes a Note 1 that is added to STS SR 3.6.1.3.10. STS SR 3.6.1.3.10 does not contain such a Note, however, BWR 16 justification C.5, approved by the staff, added this Note to STS SR 3.6.1.3.10. It was inadvertently omitted in Revision 1 to the NUREGs. TSB 13 has been generated to correct this problem. ITS B3.6.1.3 Bases SR 3.6.1.3.12 deletes this Note description based on Bases JFD 7. This is incorrect. Bases JFD 7 has nothing to do with this Note. A justification similar to JFD 2 would be a more appropriate justification for deleting the Note description.*

Comment: *Provide additional discussion and justification for the deletion of this Note description.*

Licensee Response:

JFD 7 states that changes were made to reflect changes made to the Specification. This was the JFD that was used to delete the same Note description in the ISTS SR 3.6.1.3.2, ISTS SR 3.6.1.3.6, ISTS SR 3.6.1.3.9, and ISTS SR 3.6.1.3.11 Bases. NMP2 believed it seemed appropriate to use the same JFD for the deletion of the Note description from the ISTS SR 3.6.1.3.10 Bases, even though the Note did not actually appear in ISTS SR 3.6.1.3.10. A more appropriate JFD is JFD 12, which states that the change has been made to be consistent with the Specification. The ISTS Bases markup will be changed to identify JFD 12 as the proper JFD. If the actual Note were in ISTS SR 3.6.1.3.10, JFD 2 would be used to justify its deletion, similar to the deletion of this Note in the other four Surveillances identified above.

*3.6.1.3-20 Bases JFD 11*
*STS 3.6.1.3 ACTION C and Associated Bases*
*ITS 3.6.1.3 ACTIONS and Associated Bases*

*ITS 3.6.1.3 ACTION C and its Associated Bases modifies STS 3.6.1.3 ACTION C and its Associated Bases to incorporate TSTF-30. The changes to ITS 3.6.1.3 ACTION C is not in accordance with TSTF-30, in particular the Note Associated with Condition C should read "Only applicable to penetration flow paths with only one PCIV and a closed system."*

*Comment: Licensee to update submittal to conform to TSTF-30.*

Licensee Response:

TSTF-30, Rev. 3 has recently been provided to the NRC for review and approval. NMP2 will revise the submittal to be consistent with this revision, except where plant specific differences apply or where typographical/consistency errors are noted.

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*3.6.1.3-21 Bases JFD 12*
*STS B3.6.1.3 Bases - LCO*
*ITS B3.6.1.3 Bases - LCO*

*STS B3.6.1.3 Bases - LCO in the third paragraph first sentence states the following: "The normally closed PCIVs are considered OPERABLE when...automatic valves are de-activated and secured in their closed position,..." ITS B3.6.1.3 Bases - LCO deletes the words "automatic valves are deactivated and secured in their closed position." The justification used for this deletion (Bases JFD 12) states that it is for consistency with similar phrases or with the Specification. This is unacceptable. The sentence deals with those PCIVs manual or otherwise that during normal operation are closed. This defines for these valves their OPERABILITY. Based on the discussion in ITS B3.6.1.3- Bases BACKGROUND, NMP-2 does contain in their design de-activated automatic valves secured in their closed position. Thus the phrase cannot be deleted.*

*Comment: Delete this change.*

Licensee Response:

The LCO Bases states that a normally closed, automatic valve that is de-activated and secured in the closed position is OPERABLE. NMP2 believed that this statement was referring to automatic valves that were closed and de-activated to comply with an ACTION. For this type of valve, this statement is not correct. NMP2 considers this type of valve inoperable even when closed and de-activated, and takes the appropriate Actions required by the CTS 3.6.3. The Actions would require the associated penetration to be isolated by use of a de-activated valve, which would already be met. In addition, CTS 4.6.1.1.b requires the associated penetration to be periodically verified isolated, since the associated penetration is required to

be closed during accident conditions and is not capable of being isolated by an OPERABLE automatic valve. The ISTS incorporated this CTS requirement into ITS 3.6.1.3 Required Actions A.2 and C.2, as well as ISTS SR 3.6.1.3.3 and ISTS SR 3.6.1.3.4. However, upon discussion with another licensee in the process of adopting the ITS, NMP2 learned that the intent of this statement was to describe automatic PCIVs that are normally closed and de-activated due to system design requirements; it was not intended to apply to automatic valves isolated to comply with an ACTION. NMP2 does have this type of automatic PCIV, since some automatic PCIVs are normally closed and de-activated to meet 10 CFR 50 Appendix R requirements. Therefore, the LCO Bases section will be modified to reflect this design. However, in lieu of adding back into the LCO Bases the words from the ISTS, the LCO Bases will be modified to more clearly state the requirements, similar to the words recently agreed upon by the NRC reviewer for the Fermi ITS submittal.

In addition, while NMP2 does have these types of valves, this was not stated in our Background section. The Background section of the Bases states that an automatic valve that is de-activated and secured in the closed position is a passive device, however, it does not state that NMP2 has a valve that is normally in this condition. This statement is strictly defining what a passive device is. In addition, while the Background section of the Bases states that the 12 and 14 inch purge valves, which are automatic valves, are closed, it does not state that they are de-activated and secured in the closed position. Therefore, the Background section of the Bases does not identify that this type of valve is applicable to the NMP2 design.

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*3.6.1.3-22 Bases JFD 12*
*STS B3.6.1.3 Bases - C.1 and C.2, SR 3.6.1.3.3 and SR 3.6.1.3.4*
*ITS B3.6.1.3 Bases - C.1 and C.2, SR 3.6.1.3.2 and SR 3.6.1.3.3*

*In a number of places, ITS B3.6.1.3 Bases changes the STS words "valves and blind flanges", "these valves," and "PCIVs" to the generic term "isolation devices". The change is incorrect. The term "isolation device" is not defined in the Bases and based on its intended use encompasses more than just valves, it would include blind flanges, plugs, caps, and other suitable closure devices (See Comment Numbers 3.6.1.3-15 and 3.6.4.2-4). In all cases where the change was made the discussion concerned the applicability of the Note and/or the verification of valve misposition. Blind flanges, plugs, caps and other suitable closure devices cannot be mispositioned. They are fixed isolation devices. Thus the STS words are the correct words. See Comment Numbers 3.6.1.3-24 and 3.6.4.2-8.*

*Comment: Delete this change. See Comment Numbers 3.6.1.3-15, 3.6.1.3-24, 3.6.4.2-4 and 3.6.4.2-8.*

Licensee Response:

The term "isolation devices" is implicitly defined in the ISTS. The Notes and Completion Times for ISTS 3.6.1.3 Required Actions A.2, C.2, and E.2 use the term "isolation devices". In these cases, it is referring to the isolation devices described in ISTS 3.6.1.3 Required Actions A.1, C.1, and E.1; closed and de-activated automatic valves, closed manual valves,

blind flanges, or check valves with flow through the valves secured for Required Action A.1 and closed and de-activated automatic valves, closed manual valves, or blind flanges for Required Actions C.1 and E.1. The Bases for these Completion Times and Notes also use the term "isolation devices." NMP2 was attempting to change those words in the ACTIONS Bases to be consistent with the words in the Notes and Completion Times of the Required Actions. For example, in the description of the Notes for Required Action C.2 (Bases page B 3.6-22, 1st complete paragraph), the statement is "Required Action C.2 is modified by two Notes. Note 1 applies to valves and blind flanges located in high radiation areas..." However, in the description of the essentially identical Notes for Required Actions A.2 and E.2 (Bases pages B 3.6-20 and insert page B 3.6-23), the words are "isolation devices" in lieu of "valves and blind flanges." (The Bases words for Required Action E.2 were added in accordance with approved TSTF-269).

The word "PCIVs" is used in the Bases for ISTS SR 3.6.1.3.3 and ISTS SR 3.6.1.3.4 when describing the Frequency or Note allowances that are similar to the Completion Times and Notes in the Required Actions. NMP2 changed this word to "isolation devices" to be consistent with the Required Actions Bases. However, NMP2 notes that the term "isolation devices" is not used in the Notes or the Frequencies of ISTS SR 3.6.1.3.3 and ISTS SR 3.6.1.3.4 (ITS SR 3.6.1.3.2 and ITS SR 3.6.1.3.3); thus, the word "PCIVs" could be used in the Bases for the Surveillances without creating any misunderstanding. Therefore, in order to maintain consistency with the ISTS as much as possible in this area, the words "isolation devices" will be changed back to "PCIVs" in the Bases for ITS SR 3.6.1.3.2 and ITS SR 3.6.1.3.3.

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*3.6.1.3-23 Bases JFD 12*

*STS 3.6.1.3 Required Actions A.2 Notes, C.2 Notes, E.2 Notes, and Associated Bases*

*ITS 3.6.1.3 Required Actions A.2 Notes, C.2 Notes, E.2 Notes and Associated Bases*

*STS 3.6.1.3 Required Actions A.2 Notes, C.2 Notes, E.2 Notes and their Associated Bases have been modified by TSTF-269. ITS 3.6.1.3 Required ACTIONS A.2 Notes, C.2 Notes, E.2 Notes and their Associated Bases incorporates the changes made by TSTF-269. The changes made to ITS 3.6.1.3 and the Associated Bases are in accordance with TSTF-269 except for the changes made to ITS B3.6.1.3 Bases - E.1, E.2 and E.3. The change is improperly located and "Insert E.2" differs from TSTF-269 "Insert 3". Insufficient justification (Bases JFD 12) is provided for a potentially generic change.*

*Comment: Licensee to update the submittal to conform to TSTF-269.*

Licensee Response:

NMP2 decided to locate the insert after the description of the Required Actions it was modifying. This was done for clarity and consistency with other Note descriptions. This

change is not a technical change and in no way affects the meaning of the Note description. Therefore, NMP2 believes that the Note description should remain as identified in the NMP2 ITS submittal. NMP2 added an additional justification statement for the Note descriptions added by TSTF-269. This statement is consistent with the Bases description for the same Note in Required Actions A.2 and C.2 (Bases page B 3.6-20 and B 3.6-22). However, it was noted that NMP2 placed the added statement in the wrong location; it was placed after the Note 1 description instead of after the Note 2 description. The submittal will be modified to place it after the Note 2 description, consistent with the Bases for the same Note in Required Actions A.2 and C.2. This change is consistent with similar phrases in other parts of the Bases, as stated in JFD 12.

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*3.6.1.3-24 Bases JFD 12*
*STS B3.6.1.3 Bases - SR 3.6.1.3.3*
*ITS B3.6.1.3 Bases - SR 3.6.1.3.2*

*The last sentence in the first paragraph of STS B3.6.1.3 Bases - SR 3.6.1.3.3 states the following: "Since verification of valve position for PCIVs..." ITS B3.6.1.3 Bases - SR 3.6.1.3.2 deletes the word "valve" from the sentence. The justification used for this deletion (Bases JFD 12) bases the deletion on consistency. This is incorrect. Based on the discussion associated with Comment Number 3.6.1.3-22, the word "valve" cannot be deleted.*

*Comment: Delete this change.*

Licensee Response:

ISTS SR 3.6.1.3.3 (ITS SR 3.6.1.3.2) requires both valves and blind flanges to be verified, not just valves. The Bases statement only used the word "valves" to state why the 31 day Frequency is acceptable. No similar justification was provided for why 31 days was acceptable for blind flanges. Since this justification applies to both valves and blind flanges, the current ISTS Bases statement is not totally correct and is not consistent with the actual Surveillance Requirement (since both valves and blind flanges are required to be checked). Thus, the word "valve" was deleted and justified by JFD 12, which states that changes were made to be consistent with the Specification, which NMP2 believes to be correct.

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*3.6.1.3-25 CTS 3.6.1.1 ACTIONS*
*CTS 4.6.1.1.b*
*ITS 3.6.1.3 ACTIONS*
*ITS SR 3.6.1.3.2, SR 3.6.1.3.3 and Associated Bases*

*CTS 4.6.1.1.b verifies that all penetrations not capable of being closed by OPERABLE automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions. The corresponding ITS SRs for this CTS surveillance are ITS SR 3.6.1.3.2 for valves outside containment and ITS SR 3.6.1.3.3 for valves inside containment. If CTS 4.6.1.1.b cannot be*

*met, the ACTIONS of CTS 3.6.1.1 are entered which require restoration of valve OPERABILITY within 1 hour or shutdown within the following 36 hours. If ITS SR 3.6.1.3.2 or ITS SR 3.6.1.3.3 cannot be met, the ACTIONS of ITS 3.6.1.3 are entered which allows for one valve inoperable between 4 hours and 72 hours depending on the type of penetration to restore valve OPERABILITY before shutdown commences. This Less Restrictive (L) change to the CTS is not justified.*

*Comment: Revise the CTS markup to show this Less Restrictive change and provide the appropriate discussions and justifications.*

Licensee Response:

When CTS 4.6.1.1.b is not met, this does not directly result in entering the Actions of CTS 3.6.1.1. If a valve is open that is not allowed to be open, the Actions of CTS 3.6.3 are entered, not the Actions of CTS 3.6.1.1. CTS LCO 3.6.1.1 requires PRIMARY CONTAINMENT INTEGRITY to be maintained. CTS 1.31, which defines PRIMARY CONTAINMENT INTEGRITY, states, in part, that PRIMARY CONTAINMENT INTEGRITY exists when "All primary containment penetrations required to be closed during accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic valve secured in its closed position, except as provided in Specification 3.6.3." Thus, when one of the two manual valves in the penetration is open, PRIMARY CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the Actions of CTS 3.6.1.1 do not have to be entered. With one of the two valves open when not allowed by CTS 3.6.3 footnote **, this valve would be declared inoperable and the Actions of CTS 3.6.3 would be entered. CTS 3.6.3 allows 4 hours to isolate the affected penetration. ISTS 3.6.1.3 ACTIONS are consistent with this 4 hour allowance, except where justified (the change to 72 hours for some valves is justified in DOC L.1). Therefore, since the current time in the CTS to isolate a valve is consistent with the proposed time in the ITS to isolate a valve (except where previously justified in DOC L.1), no additional justification is necessary.

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*3.6.1.4-1* *Bases JFD 2*
*STS B3.6.1.4 Bases - BACKGROUND*
*ITS B3.6.1.4 Bases - BACKGROUND*

*The last sentence in the third paragraph of STS B3.6.1.4 Bases - BACKGROUND states the following: "Therefore the Specification Pressure limits of [-0.1 and 1.0 psid] were established (Ref.2)." ITS B3.6.1.4 Bases - BACKGROUND deletes this sentence based on changes made to reflect plant specific nomenclature, system description or analysis description (Bases JFD 2). This is insufficient justification for this deletion. The pressures specified in ITS B3.6.1.4 Bases - BACKGROUND and APPLICABLE SAFETY ANALYSES specify the containment design pressure. The STS statement establishes where the LCO pressure limits were determined. The statement needs to be retained so that the Bases discussion is complete.*

*Comment: Correct this discrepancy.*

Licensee Response:

The deleted statement is duplicative of the first and second sentences in the Applicable Safety Analyses section of the Bases, and the first sentence of the LCO section of the Bases. The deleted statement is describing the USAR section that defines what the limit is and how it is determined. This type of description is applicable to the Applicable Safety Analyses and LCO sections, therefore, it does not need to be duplicated in the Background section. Since this change is not a technical change and is just deleting duplicative information, NMP2 believes this change is appropriate. For clarity, a new JFD will be provided.

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*3.6.1.5-2* *Bases JFD 2*
*ITS B3.6.1.5 Bases - LCO*

*ITS B3.6.1.5 Bases - LCO states the following: "...the peak accident temperature is maintained below the design temperature and less than the design negative differential pressure across the primary containment boundary." This sentence does not make sense and is incomplete in that there is no correlation stated between the accident temperature and design negative differential pressure.*

*Comment: Correct this discrepancy.*

Licensee Response:

The words "less than" will be deleted and the words "is not exceeded" will be added at the end of the sentence.

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*3.6.1.6-1* *DOC A.1*
*DOC A.2*
*DOC A.3*
*DOC LA. 1*
*DOC LA. 2*
*DOC L.1*
*DOC L.2*
*JFD 1*
*JFD 2*
*JFD 3*
*JFD 4*
*JFD 5*
*Bases JFD 1*
*Bases JFD 2*
*Bases JFD 3*

*Bases JFD 4*
*CTS 3/4.6.2.2*
*ITS 3.6.1.6 and Associated Bases*
*ITS 3.6.2.4 and Associated Bases*

*The structure and wording of CTS 3/4.6.6.2 implies that the RHR Suppression Pool and Drywell Spray System is one system not two independent systems as presented in ITS 3.6.1.6 and ITS 3.6.2.4. Insufficient information is provided in the DOCs, JFDs, Bases JFDs and Bases for ITS 3.6.1.6 and 3.6.2.4 for the staff to conclude that these are two independent systems and that CTS 3/4.6.6.2 should be split into two systems specifications.*

*Comment: Provide additional discussion and justification to show that the design of the RHR Suppression Pool and Drywell Spray System warrants two specifications. The licensee, as a minimum, needs to provide a description of system/subsystem operation and alignment and appropriate PIDs.*

Licensee Response:

The wording of CTS 3/4.6.6.2 does not imply that the Residual Heat Removal (RHR) Drywell Spray and RHR Suppression Pool Spray are one system. They are both separate modes of the RHR System, as stated in the CTS LCO statement. Also, the CTS Actions show that they are separate modes by the use of the term "and/or" when describing the modes. The drywell spray mode of the RHR System provides spray flow to the drywell while the suppression pool spray mode provides spray flow to the suppression pool. The two modes share many common components, including RHR pumps. The two modes split apart off the RHR discharge piping, and have separate spray headers and spray header isolation valves. This is essentially where all RHR modes split apart; e.g., RHR suppression pool cooling and Low Pressure Coolant Injection (LPCI). A complete description of the RHR System, including one line diagrams of the system, are provided in USAR, Section 5.4.7. Under normal conditions, all spray valves are closed. When the modes are needed, the necessary RHR pumps are started and the appropriate spray valve (either the suppression pool spray valve or the drywell spray valve) is opened. The plant Emergency Operating Procedures (EOPs) direct the operators to use suppression pool spray first. Operation of this spray should decrease pressure sufficiently such that drywell spray operation is not needed. NMP2 split the two modes into separate Technical Specifications to be consistent with the ISTS. The BWR/6 ISTS has a containment spray mode Technical Specification, and the containment spray mode does not spray the suppression pool. The BWR/4 ISTS has a suppression pool spray mode Technical Specification, and the suppression pool spray mode does not spray the drywell. Thus, NMP2 used both of these Technical Specifications. Essentially, the only components that are likely to be found inoperable while in MODES 1, 2, and 3 that are not common to the two modes are the individual spray valves. Likewise, the only components that are likely to be found inoperable while in MODES 1, 2, and 3 that are not common to all the RHR System modes are the individual mode valves.

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*3.6.1.6-2* *DOC A.2*
*CTS 3.6.2.2 ACTION b and Associated* Footnote*
*ITS 3.6.1.6 ACTION C*

*With both suppression chamber and/or drywell spray loops inoperable, CTS 3.6.2.2 ACTION b requires the restoration of at least one loop to OPERABLE status within 8 hours or be in COLD SHUTDOWN (MODE 4) within 36 hours. The ACTION statement is modified by a footnote which states that "if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods." The footnote allows the plant to remain in HOT SHUTDOWN (MODE 3) indefinitely. The CTS markup shows this footnote as being deleted, and justifies the deletion as an Administrative change (DOC A.2). This is incorrect. ITS 3.6.1.6 ACTION C requires being in MODE 4 within 36 hours with no allowance to remain in MODE 3 beyond the 36 hours as allowed by the CTS.*

*Remaining in MODE 3 beyond the 36 hours in the ITS would constitute a violation of TS which is not the case in the CTS. Thus the change is a More Restrictive change. This discussion is also applicable to similar changes made in the CTS markups for ITS 3.6.2.3 and 3.6.2.4. See Comment Numbers 3.6.2.3-1 and 3.6.2.4-3.*

*Comment: Revise the CTS markup and provide additional discussion and justification for this More Restrictive change. See Comment Numbers 3.6.2.3-1 and 3.6.2.4-3.*

Licensee Response:

While the CTS footnote appears to allow the unit to remain in MODE 3 for an unlimited amount of time, in reality it only allows the unit to remain in MODE 3 as long as MODE 4 cannot be attained. This is not an unlimited amount of time. Deletion of the footnote does not really take away an allowance that impacts operation of the unit; in the ITS (which does not include the footnote allowance), if sufficient equipment is inoperable such that MODE 4 cannot be attained, then the unit will still be forced to stay in MODE 3. When MODE 4 is not reached in the required time, a violation of Technical Specifications occurs. However, this is not a purposeful or intentional Technical Specifications violation. Thus, the only difference between CTS compliance and ITS compliance is that without the footnote, a report to the NRC may be required by 10 CFR 50. However, this report is not a Technical Specification requirement, thus there is no change to the Technical Specifications. In addition, this identical change (deletion of this footnote) in another Specification has previously been reviewed and approved by the NRC Reviewer as an administrative change in another section of the NMP2 ITS submittal. It is not appropriate to classify the change differently in separate sections. The NRC has also previously approved this same change as an administrative change in the most recently approved BWR/5 ITS submittal. Therefore, NMP2 believes this change should remain as an administrative change.

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*3.6.1.6-4* *JFD 3*
*Bases JFD 1*
*CTS 3.6.2.2.b*
*CTS 4.6.2.2.b*
*STS 3.6.1.7.2 and Associated Bases*

*CTS 3.6.2.2.b requires an OPERABLE flow path capable of recirculating water from the suppression pool through an RHR heat exchanger and the suppression chamber and drywell spray spargers. CTS 4.6.2.2.b verifies the minimum required flow rate through a portion of this OPERABLE flow path. STS SR 3.6.1.7.2 which is the corresponding SR for this CTS surveillance is not adopted. However, ITS 3.6.2.4 includes this surveillance as SR 3.6.2.4.2 and JFD 3 states STS 3.6.1.7.2 which is the same as this CTS 4.6.2.2.b is met in ITS SR 3.6.2.3.2. Therefore, rather than delete the STS SR requirement, the ITS SR should retain; or, at least modify it to refer to ITS SR 3.6.2.3.2 and/or SR 3.6.2.4.2.*

*Comment: Revise the CTS/ITS markups to show that CTS 4.6.2.2.b is covered in ITS 3.6.1.6. Provide additional discussion and justification for this change.*

Licensee Response:

ISTS SR 3.6.1.7.2 requires a verification that each RHR pump develop a required flow rate on recirculation flow through the associated heat exchanger to the suppression pool. When an RHR pump is pumping water on recirculation flow through the associated heat exchanger to the suppression pool, the pump is in the suppression pool cooling mode, not the drywell spray mode. If the pump were in the drywell spray mode, then it would have to be circulating water through the drywell spray headers, not to the suppression pool. The Bases for this ISTS SR also states that during this test, it is in the suppression pool cooling mode. Therefore, JFD 3, which states that the requirement of this Surveillance is being tested as part of ITS 3.6.2.3, the Suppression Pool Cooling Technical Specification, is correct.

The ISTS SR is not being added (it is currently not required in the NMP2 CTS, as stated in JFD 3) since NMP2 would not routinely test the drywell spray mode by pumping water through the pipes. This would spray water over the equipment in the drywell. NMP2 ensures that the spray headers are unobstructed by performing an air flow test, as required by CTS 4.6.2.2.c. This requirement has been retained in the ITS.

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*3.6.1.6-6* *Bases JFD 4*
*STS B3.6.1.7 Bases - A.1 and B.1*
*ITS B3.6.1.6 Bases - A.1 and B.1*

*STS B3.6.1.7 Bases - A.1 and B.1 use the phrase "In this Condition..." ITS B3.6.1.6 Bases - A.1 and B.1 decapitalizes the "C" in "Condition" and justifies it as a change made for consistency with other similar phrases in the ITS Bases. This is incorrect. The condition referred to in the sentence is Condition A or Condition B and not the system operating or physical condition. Therefore, it should be "Condition" rather than "condition".*

*Comment: Correct this discrepancy.*

Licensee Response:

The condition referred to in the sentence is not Condition A or B, but the physical condition. ITS Section 1.3 states that an ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability. Thus, when both drywell spray subsystems are inoperable, since one inoperable drywell spray subsystem exists as well as two inoperable subsystems exist, both Conditions A and B must be entered and their Required Actions taken. The Bases for Condition A states "In this Condition, the remaining OPERABLE RHR ... spray subsystem is adequate to perform the ... function." This is obviously not true since there is no remaining OPERABLE RHR spray subsystem while in this Condition. Under the same scenario, with the word changed to "condition," the statement in the Bases would be correct, since it is now stating that when only one spray subsystem is inoperable, the remaining OPERABLE spray subsystem can perform the required function. NMP2 believes this is essentially a typographical error in the ISTS, and it is being fixed so that it does not conflict with other similar descriptions in the Bases (e.g., ISTS Bases for 3.1.7, 3.4.9, 3.7.3, and 3.7.4). In addition, this change has been reviewed and approved by other NRC Reviewers in other sections of the NMP2 ITS submittal, and has been reviewed and approved by the NRC in the most recent BWR/5 ITS submittal.

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*3.6.1.7-1* *DOC A.1*
*CTS 3/4.6.4*
*ITS 3.6.1.7*

*CTS 3/4.6.4 has been converted into the Improved Technical Specifications requirements using the guidance of NUREG-1433 for STS 3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers. DOC A.1 states that this ITS is based upon the guidance provided in NUREG-1434 which contradicts with the presentation of the ITS markup.*

*Comment: Revise DOC A.1 to be consistent.*

Licensee Response:

DOC A.1 will be modified to identify NUREG-1433 as the correct reference.

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*3.6.1.7-2* *DOC A.2*
*JFD 4*
*Bases JFD 5*
*CTS 3.6.4 ACTION b*
*ITS 3.6.1.7 Conditions B and C and Associated Bases.*

*The CTS markup of CTS 3.6.4 ACTION b is modified by the addition of a Note to allow separate condition entry for each suppression chamber-to-drywell vacuum breaker. The effect of adding this Note to ITS 3.6.1.7 Conditions B and C would permit vacuum breaker inoperabilities to co-exist in all four vacuum breaker lines. Contrary to DOC A.2, this is not the intention of CTS 3.6.4 and the associated ACTIONS which only allows one vacuum breaker pair to be inoperable. The staff finds that the suppression chamber-to-drywell vacuum breaker design is no different than any other BWR that has suppression chamber-to-drywell vacuum breakers. Thus, the staff finds this change to be a beyond scope of review item for this conversion, as well as a generic change. See Comment Number 3.6.1.7-3 for additional concerns with regards to this Note.*

*Comment: Delete this generic change. See Comment Number 3.6.1.7-3.*

Licensee Response:

This change is not a generic change nor is it a beyond scope change. The ISTS 3.6.1.8 Bases describes the suppression chamber-to-drywell vacuum breakers as being one vacuum breaker in a line. Thus, with one vacuum breaker open, there is an open pathway between the suppression chamber and the drywell. The NMP2 design has two vacuum breakers per line. When only one vacuum breaker is open, the remaining vacuum breaker in the line maintains the line isolated; there is no communication between the suppression pool and the drywell. The NMP2 CTS reflects this design. CTS 3.6.4 Action b allows one vacuum breaker in a line to be open, provided the remaining vacuum breaker in the associated line is closed, and the open vacuum breaker is closed in 72 hours. As described in DOC A.2, this Action is taken on a per line basis, since as long as each line has a closed vacuum breaker, there is no open pathway between the suppression chamber and the drywell. This is the current NMP2 interpretation of how to apply this Action. The design of the NMP2 suppression pool-to-drywell vacuum breakers is also similar to the design of the reactor building-to-suppression chamber vacuum breakers described in the Bases of NUREG-1433, ISTS 3.6.1.7, with respect to the number of vacuum breakers in a line. The reactor building-to-suppression chamber vacuum breakers described in ISTS 3.6.1.7 (NUREG-1433) have two vacuum breakers per line. ISTS 3.6.1.7 ACTION A, as approved by the NRC, allows one vacuum breaker per line to be open for up to 72 hours (i.e., the ACTION is on a per line basis). The proposed ITS 3.6.1.7 is consistent with this allowance. In addition, the design of the WNP-2 suppression chamber-to-drywell vacuum breakers is similar to the design of NMP2, with respect to the number of vacuum breakers in a line, and the WNP-2 CTS used similar wording in describing the actions to be taken when a vacuum breaker in a line was open. The NRC has previously reviewed and approved this interpretation and its justification with an Administrative DOC.

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*3.6.1.7-3* *DOC A.3*
*JFD 4*
*Bases JFD 5*
*CTS 3.6.4 ACTION b*
*STS 3.6.1.8 Condition B and Associated Bases*
*ITS 3.6.1.7 Conditions B and C and Associated Bases*

*CTS 3.6.4 ACTION b specifies that with one suppression chamber-to-drywell vacuum breaker open, "verify the other vacuum breaker in the pair to be closed within 2 hours and restore the open vacuum breaker to the closed position within 72 hours..." The ITS markup breaks this ACTION up into two ACTIONS. ITS 3.6.1.7 ACTION B addresses the closing of the open vacuum breaker within 72 hours while ITS 3.6.1.7 ACTION C addresses the verification/closing of the other vacuum breaker in the line within 2 hours. However, both ITS 3.6.1.7 Conditions B and C have been modified such that they do not reflect the intent of CTS 3.6.4 ACTION b. The modification is the addition of the words "One or more lines with". The effect of adding these words would permit vacuum breaker inoperabilities to co-exist in all four lines concurrently and in conjunction with the proposed Note of separate condition entry would result in a loss of function which is not allowed per current licensing basis. The staff finds that the suppression chamber-to-drywell vacuum breaker design is no different than any other BWR that has suppression chamber-to-drywell vacuum breakers. While the staff can accept, in part; the addition of ITS 3.6.1.7 ACTION C, the staff finds that the proposed modification (One or more lines with) is a beyond scope of review item for this conversion and is considered a generic change to ITS 3.6.1.7 Condition B (STS 3.6.1.8 Condition B).*

*Comment: Delete this change.*

Licensee Response:

As stated in the response to RAI 3.6.1.7-2 above, the design of the NMP2 suppression chamber-to-drywell vacuum breakers is different than that described in the ISTS 3.6.1.8 Bases. The ISTS 3.6.1.8 Bases describes the suppression chamber-to-drywell vacuum breakers as being one vacuum breaker in a line. Thus, with one vacuum breaker open, there is an open pathway between the suppression chamber and the drywell. The NMP2 design has two vacuum breakers per line. When only one vacuum breaker is open, the remaining vacuum breaker in the line maintains the line isolated; there is no communication between the suppression pool and the drywell. The NMP2 CTS reflects this design. The vacuum breakers have two functions: a) to open when required to ensure the drywell-to-suppression chamber negative differential pressure remains within the design value, and b) to remain closed (except when performing their intended function or being tested) to ensure there is no excessive bypass leakage should a loss-of-coolant accident (LOCA) occur. The addition of the clarifying Condition C Note does not affect the first function; loss of this function does not result from the addition of this clarifying Note, since Condition C is only describing a condition in which the vacuum breakers are open. With both vacuum breakers open in only a single line, the second function cannot be met. Allowing all vacuum breakers to be open in more than one line does not result in a condition any different than caused by vacuum breakers open in only one line. The NMP2 CTS allows both vacuum breakers to be open in a line for up to 2 hours, since CTS 3.6.4 Action b allows 2 hours to perform the verification that one vacuum breaker in the associated line is closed. Thus the CTS already allows a loss of this function for 2 hours. In addition, the design of the suppression pool-to-drywell vacuum breakers is also similar to the design of the reactor building-to-suppression chamber vacuum breakers described in the Bases of NUREG-1433, ISTS 3.6.1.7, with respect to the number of vacuum breakers in a line. The reactor building-to-suppression chamber vacuum breakers described in ISTS 3.6.1.7 have two vacuum breakers per line. ISTS 3.6.1.7 ACTION B, as approved by the

NRC, allows both vacuum breakers in all lines to be open for up to 1 hour (i.e., the ACTION is on a per line basis as stated in the Note to the ACTIONS). The proposed ITS 3.6.1.7 is consistent with this allowance (to allow all vacuum breakers to be open for a short time). Therefore, the addition of the Notes to Conditions B and C is not a generic change or a beyond scope change.

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*3.6.1.7-4* *DOC A.4*
*JFD 3*
*Bases JFD 5*
*CTS 4.6.4.a*
*ITS SR 3.6.1.7.1 and Associated Bases*

*CTS 4.6.4.a is modified in the CTS markup by two Notes. Note 1 states that ITS SR 3.6.1.7.1 is not required to be met when the vacuum breakers are opened to perform other surveillances and thus prevents entry into the ACTION statements. Note 2 does the same for when the vacuum breakers open due to performance of their intended function, that is vacuum relief. The addition of these Notes is justified as an Administrative change (DOC A.2). While the addition of Note 2 is clearly an Administrative change, the addition of Note 1 is a Less Restrictive (L) change. The CTS would require entry into the ACTIONS of CTS 3.6.4 whenever performing CTS 4.6.4.b.1, 4.6.4.b.2 and 4.6.4.b.3.a), since performing the surveillance would result in CTS 4.6.4.a not being met.*

*Comment: Revise the CTS markup and provide additional discussion and justification for this Less Restrictive (L) change.*

Licensee Response:

The change was submitted and categorized as an administrative change consistent with the NRC's review and approval of the previous BWR/5 ITS submittal. NMP2 understands that the NRC would prefer this change to be identified as less restrictive. Consistent with this current expectation, NMP2 will revise our submittal accordingly.

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*3.6.1.7-6* *DOC L.1*
*CTS 3.6.3 ACTION c*
*CTS 4.6.4.b.2 and 4.6.4.b.3.b*

*CTS 3.6.3 ACTION c, 4.6.4.b.2, and 4.6.4.b.3.b establish ACTIONS and surveillance requirements for the instrumentation used to monitor suppression chamber-to-drywell vacuum breaker position. Since this instrumentation performs an indication - only function, it can be relocated out of the technical specification. However, because it is the primary means used to verify the vacuum breaker position, it has a direct relation in verifying the suppression chamber-to-drywell vacuum breaker OPERABILITY. Therefore, this information needs to be*

*relocated to a licensee-controlled documents controlled by 10 CFR 50.59, and the change should be a Less Restrictive (LA) change rather than a Less Restrictive (L) change.*

*Comment: Revise the CTS markup and provide the appropriate discussions and justifications to indicate that this information is being relocated to a 10 CFR 50.59 licensee-controlled document.*

Licensee Response:

It is not necessary to relocate these requirements to a licensee-controlled document controlled by 10 CFR 50.59. While this instrumentation is the primary method, it is not the only method by which the vacuum breaker position can be determined. Therefore, consistent with the vast majority of instrumentation used to determine that a parameter required by Technical Specifications is within the required limits, this instrumentation will not be required by the Technical Specifications. NMP2 intends to maintain the current Surveillance Requirements in plant procedures. The NRC has previously reviewed and approved the allowance to remove this instrumentation from the Technical Specifications and to be controlled by a plant document not covered by 10 CFR 50.59 in the most recent BWR/5 ITS submittal. Therefore, this type of control for the NMP2 instrumentation is considered appropriate.

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*3.6.1.7-7 Bases JFD 3*
*ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES and REFERENCES*

*See Comment Number 3.6.0-2.*

*Comment: See Comment Number 3.6.0-2*

Licensee Response:

No response required. Comment 3.6.0-2 was not submitted as an RAI to NMP2.

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*3.6.1.7-8 Bases JFD 6*
*STS B3.6.1.8 Bases - APPLICABILITY*
*ITS B3.6.1.7 Bases - APPLICABILITY*

*STS B3.6.1.8 Bases - APPLICABILITY justifies the OPERABILITY of the suppression chamber-to-drywell vacuum breakers in MODES 1, 2, and 3. Two conditions related to excessive negative pressure necessitate this MODE applicability, an inadvertent actuation of the Suppression Pool Spray System and depressurization of the drywell. ITS B3.6.1.7 Bases APPLICABILITY states that depressurization of the drywell could occur due to inadvertent actuation of the Drywell Spray System. All mention of inadvertent actuation of the Suppression Pool Spray System has been deleted. Bases JFD 6 states that inadvertent actuation of the Suppression Pool Spray System is not the main concern. The justification does not adequately*

*address this deletion since it implies that it is a concern in drywell depressurization, just not the main concern. In addition, the change could be considered a potential generic change.*

*Comment: Provide additional justification and discussion for this deletion based on current licensing bases, system design or operational constraints.*

Licensee Response:

JFD 6 will be modified to state that suppression pool spray cannot cause excessive negative pressure; only drywell spray can cause this event.

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*3.6.2.1-1* *DOC A.2*
*CTS 4.6.2.1.b*
*ITS SR 3.6.2.1.1*

*CTS 4.6.2.1.b requires at least once every 24 hours in "Operational Conditions 1 or 2" that the suppression pool average temperature is less that 90 °F. ITS SR 3.6.2.1.1 retains this same requirement; however the surveillance is required prior to the unit entering MODE 3 and during MODES 1, 2, or 3. DOC A.2 does not explain this change which is not an Administrative change but a More Restrictive change.*

*Comment: Revise the CTS markup and provide additional discussion and justification for this More Restrictive change.*

Licensee Response:

A new More Restrictive DOC will be provided to justify this change.

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*3.6.2.1-2* *DOC A.2*
*JFD 1*
*Bases JFD 3*
*CTS 3.6.2.1.a.2*
*CTS 3.6.2.1 ACTION b*

*CTS 3.6.2.1.a.2 provides LCO requirements during "Operation Conditions 1 or 2"; and CTS 3.6.2.1.a.2.b provides LCO requirements with the Thermal Power ≤ 1%. ITS 3.6.2.1 provides LCO requirements with the Thermal Power based on 1% RTP. DOC A.2 does not describe or specifically explain the CTS technical change which equates the CTS requirement of "Operational Conditions 1 or 2" to the ITS requirement" with the Thermal Power based on 1% RTP". Since it is not stated in NUREG-1434 Table 1.1-1, a technical justification is needed that explains that the allowed range of Thermal Power permitted while in the CTS Operational Conditions or in ITS MODES 1, 2, or 3 for this LCO is an Administrative change.*

*Comment: Provide additional discussion and justification to show that this is an Administrative change for both the LCO and the ACTIONS.*

Licensee Response:

DOC A.2 will be clarified to include the CTS Applicability of Operational Conditions 1 and 2 when describing the change to CTS 3.6.2.1.a.2 and CTS 3:6.2.1.a.2.a) and the Actions.

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*3.6.2.1-3 DOC L.2*
*CTS 3.6.2.1 ACTIONS c and d*
*CTS 4.6.2.1.c*

*CTS 3.6.2.1 ACTIONS c and d and 4.6.2.1.c establish ACTIONS and surveillance requirements for the instrumentation used to monitor suppression pool temperature. Since this instrumentation performs an alarm/indication - only function, it can be relocated out of the technical specification. However, because it is the primary means used to verify the temperature limit, it has a direct relation in verifying the suppression pool temperature limit. Therefore, this information needs to be relocated to a licensee-controlled documents controlled by 10 CFR 50.59, and the change should be a Less Restrictive (LA) change rather than a Less Restrictive (L) change.*

*Comment: Revise the CTS markup and provide the appropriate discussions and justifications to indicate that this information is being relocated to a 10 CFR 50.59 licensee-controlled document.*

Licensee Response:

It is not necessary to relocate these requirements to a licensee-controlled document controlled by 10 CFR 50.59. This instrumentation is not the only method by which the suppression pool temperature can be determined. Other instrumentation, required by the CTS (i.e, post accident monitoring instrumentation) can also be used. Therefore, consistent with the vast majority of instrumentation used to determine that a parameter required by Technical Specifications is within the required limits, this instrumentation will not be required by the Technical Specifications. NMP2 intends to maintain the calibration requirement for this instrumentation in plant procedures. The NRC has previously reviewed and approved the allowance to remove this instrumentation from the Technical Specifications and to be controlled by a plant document not covered by 10 CFR 50.59 in the most recent BWR/5 ITS submittal. Therefore, this type of control for the NMP2 instrumentation is considered appropriate.

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*3.6.2.1-4* *DOC L.3*
*JFD 1*
*Bases JFD 3*
*CTS 4.6.2.1.b.2.b*
*ITS 3.6.2.1 Required ACTION B.1 and Associated Bases*

*CTS 4.6.2.1.b.2.b verifies the Thermal Power is ≤1% after the suppression pool water temperature has exceeded the 90°F limit for more than 24 hours. DOC L.3 states that CTS 4.6.2.1.b.2.b is not retained in the ITS. This is not totally correct. It is true that CTS 4.6.2.1.b.2.b is not retained as a separate ITS SR, however, it is a part of the compensatory actions (Required Action B.1) whenever the suppression pool water temperature has exceeded the limit for more than 24 hours. As stated in DOC L.3, the operator must always know the reactor power level and the suppression pool temperature which is necessary to evaluate and meet the LCO OPERABILITY and Required Actions. Therefore, a separate ITS SR is not required because it is inherently present as a part of the reformatting of the CTS requirements. The staff believes this hourly check is still retained in the plant operational procedures used to bring the reactor down to the ≤ 1% RTP required by Required Action B.1. Thus the change is a combination of an Administrative change (Retention of the verification of reactor power) and a Less Restrictive (L) change (Relocation of the 1 hour verification to licensee controlled documents). The staff would still consider this total change as Less Restrictive (L).*

*Comment: Provide additional discussion and justification for this Less Restrictive (L) change.*

Licensee Response:

CTS 4.6.2.1.b.2.b), which requires an hourly check of the power level to ensure it is ≤ 1% rated thermal power (RTP) after suppression pool water temperature has exceeded 90 degrees F for more than 24 hours is not being maintained in the ITS. While it may be inherent that an operator always knows what the current power level is, deleting a Surveillance Requirement from the Technical Specifications, even if it is maintained in a plant procedure outside of the Technical Specifications, is not an administrative change. Therefore, DOC L.3 does not need to be modified. In addition, NMP2 did not state in DOC L.3 that this current Surveillance Requirement would be maintained in a plant procedure, nor does NMP2 intend to maintain this specific Surveillance Requirement in plant procedures.

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*3.6.2.1-5* *DOC L.3*
*JFD 1*
*Bases JFD 3*
*CTS 4.6.2.1.b.3*
*ITS 3.6.2.1 ACTION D and Associated Bases*

*CTS 4.6.2.1.b.3 verifies the suppression pool temperature is ≤ 120°F at least once per 30 minutes following a scram with the suppression pool temperature ≥ 90°F. CTS 4.6.2.1.b.3 is only applicable following a scram when the suppression pool temperature is between ≥ 90°F and ≤ 120°F. ITS 3.6.2.1 ACTION D eliminates reference to a scram (which is more*

*restrictive) and provides Required Action D.2 whenever the suppression pool temperature is between > 110 °F and ≤ 120 ° F instead of the previous CTS range of > 90 °F and ≤ 120 °F. Therefore, the verification every 30 minutes is retained but occurs later after the suppression pool reaches the limit of 110 °F instead of 90 °F. Thus, the staff considers this change to be More Restrictive. Also, the CTS markup shows the "90 °F" limit in CTS 4.6.2.1.b.3 as the same rather than changed to "110 °F".*

*Comment: Revise the CTS markup and provide additional discussion and justification for this More Restrictive change.*

Licensee Response:

CTS 4.6.2.1.b.3 requires the suppression pool temperature to be verified ≤ 120 degrees F following a scram when suppression pool temperature is > 90 degrees F. ITS 3.6.2.1 ACTION D did not eliminate the reference to the scram. ITS 3.6.2.1 Required Action D.1 requires the reactor mode switch to be placed in the shutdown position immediately. This results in a reactor scram if one has not already occurred automatically. Thus, ITS 3.6.2.1 Required Action D.2, which requires the temperature to be verified, is performed following a scram. Therefore, this portion of the change is not more restrictive. The CTS requires the temperature to be verified when the suppression pool temperature is between 90 degrees F and 120 degrees F. ITS 3.6.2.1 Required Action D.2 only requires this verification when the suppression pool temperature is between 110 degrees F and 120 degrees F; the ITS does not require this verification when the suppression pool temperature is between 90 degrees F and 110 degrees F. Since the CTS requires this verification between 90 degrees F and 110 degrees F, deleting the requirement is a less restrictive change, not a more restrictive change. Therefore, no change to DOC L.3 is necessary. In addition, the CTS markup for CTS 4.6.2.1.b.3 is annotated with DOC L.3, which describes that the temperature limits for when the Surveillance is being performed is being changed to 110 degrees F. Therefore, there is no reason to specifically markup the CTS page to annotate it with the actual temperature; the DOC properly describes the change. This is consistent with numerous other CTS markup pages, where the DOC provides the detail as to what is actually changed (e.g., the CTS markups for CTS LCO 3.6.2.1.a.2, CTS LCO 3.6.2.1.a.2.b), CTS 3.6.2.1 Actions b, b.1 and b.2.a), whose changes are described in DOC A.2, not annotated on the actual CTS page).

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***3.6.2.1-6*** ***Bases JFD 1***
***ITS B3.6.2.1 Bases- BACKGROUND***

*"Insert B3.6.2.1 Background" is added to the ITS 3.6.2.1 Bases- BACKGROUND discussion. In ITS 3.6.1.1, the maximum pressure for a DBA LOCA is stated as 39.75 psig. In ITS 3.6.1.4, the primary containment design limit is stated as 45 psig. This insert states the maximum allowable pressure for DBAs is 45 psig. There appears to be terminology differences here which are confusing.*

*Comment: Provide an explanation and a revision to the ITS Bases as appropriate.*

Licensee Response:

The words for this sentence in the insert were copied from the Bases for ISTS 3.6.2.1 in the BWR/4 ISTS, NUREG-1433 (except that the NMP2 plant specific value was used), since the design of the NMP2 suppression pool is more closely related to the design in the BWR/4 ISTS. The value of 45 pounds per square inch (psig) in the insert refers to the design pressure limit that cannot be exceeded during a design basis accident (DBA) LOCA. This is the same value to which the Bases for ITS 3.6.1.4 is referring. The value referred to in ITS 3.6.1.1 (39.75 psig) is the calculated peak containment pressure following a DBA LOCA. For clarity and consistency with the words in the Bases for ITS 3.6.1.4, the Bases insert for ITS 3.6.2.1 will be modified to read "design value (45 psig)" in lieu of "maximum allowable pressure for DBAs (45 psig)."

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*3.6.2.1-8* *Bases JFD 4*
*ITS LCO 3.6.2.1 and Associated Bases*
*ITS 3.6.2.1 ACTIONS and Associated Bases*

*ITS LCO 3.6.2.1, 3.6.2.1 ACTIONS and their Associated Bases are modified by TSTF-206. The changes made to ITS B3.6.2.1 Bases - LCO in particular to the last paragraph are not in accordance with TSTF-206, and insufficient justification is provided (Bases JFD 4) to justify this deviation from the TSTF.*

Comment: *Licensee to update submittal to conform to TSTF-206.*

Licensee Response:

NMP2 elected to maintain the current licensing basis value of 1% RTP in ITS LCO 3.6.2.1 in lieu of defining power in terms of a certain number of divisions on intermediate range monitor (IRM) Range 7. Since NMP2 did not use this option, there is no need to define the equivalency between 1% RTP and a specific IRM Range. Therefore, JFD 4, which states that changes have been made to reflect those changes made to the Specification, appears to be correct, since the entire last paragraph does not appear to be necessary if the IRM equivalency is not used. However, a new JFD will be provided to delete the second sentence of the last paragraph.

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*3.6.2.1-9* *Base JFD 5*
*STS B3.6.2.1 Bases - D.1 and D.2*
*ITS B3.6.2.1 Bases - D.1 and D.2*

*See Comment Number 3.6.1.6-6.*

Comment: *See Comment Number 3.6.1.6-6.*

Licensee Response:

The concept described in the NMP2 response to RAI 3.6.1.6-6 applies. However, while the word in ACTIONS D.1 and D.2 Bases is correct as either "condition" or "Condition", the word was changed in the original ITS submittal to "condition" to be consistent with all other similar places in the Bases.

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*3.6.2.3-1* *DOC A.2*
*CTS 3.6.2.3 ACTION b and Associated* Footnote*
*ITS 3.6.2.3 ACTION C*

*See Comment Number 3.6.1.6-2.*

*Comment: See Comment Number 3.6.1.6-2.*

Licensee Response:

See the NMP2 response to RAI 3.6.1.6-2.

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*3.6.2.3-2* *DOC L.1*
*CTS 3.6.2.3 ACTION b*
*STS 3.6.2.3 ACTION B and Associated Bases*
*ITS 3.6.2.3 ACTIONS B and C and Associated Bases*

*CTS 3.6.2.3 ACTION b and STS 3.6.2.3 ACTION B and its Associated Bases have been modified to address the changes made by TSTF -230. The ITS markup of ITS 3.6.2.3 ACTIONS B and C and their Associated Bases indicate that the changes made to these ITS ACTIONS are in conformance with TSTF-230. The staff's review shows that they are not in conformance with TSTF-230.*

*Comment: Licensee is to update submittal to bring it into conformance with TSTF-230.*

Licensee Response:

The NMP2 ITS submittal deviated from TSTF-230 to be consistent with the manner in which other similar ACTIONS are written and to be consistent with other similar phrases in the Bases. Specifically, the words in ACTION C, "of Condition A or B" were not used to be consistent with the words in ITS 3.6.2.4 (ISTS 3.6.2.4 of NUREG-1433) Condition C, which describes an identical condition for the RHR Suppression Pool Spray System Technical Specification, and the words in the first sentence for the ACTIONS C.1 and C.2 Bases were modified to be consistent with the same words in numerous other Bases describing this type of ACTION. NMP2 had requested the Boiling Water Reactor Owners Group (BWROG) submit a change to this approved TSTF to correct these inconsistencies, however, this has not been done as of this time. Therefore, NMP2 will provide JFDs for the deviations from TSTF-230.

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*3.6.2.3-4* *Bases JFD5*
*ITS B3.6.2.3 Bases - A.1*

*See Comment Number 3.6.1.6-6.*

*Comment: See Comment Number 3.6.1.6-6.*

Licensee Response:

The concept described in the NMP2 response to RAI 3.6.1.6-6 applies. The word in ACTIONS A.1 Bases should be "condition," not "Condition." Note that the Bases for ACTIONS B.1, which was added by TSTF-230 and approved by the NRC, uses the word "condition," which is correct.

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*3.6.2.4-1* *DOC A.1*
*DOC A.2*
*DOC A.3*
*DOC L.1*
*DOC LA.1*
*JFD 1*
*JFD 2*
*JFD 3*
*JFD 4*
*JFD 5*
*JFD 6*
*Bases JFD 1*
*Bases JFD 2*
*Bases JFD 3*
*Bases JFD 4*
*Bases JFD 5*
*Bases JFD 6*
*Bases JFD 7*
*Bases JFD 8*
*CTS 3/4.6.2.2*
*ITS 3.6.2.4 and Associated Bases*

*See Comment Number 3.6.1.6-1.*

*Comment: See Comment Number 3.6.1.6-1.*

Licensee Response:

See the NMP2 response to RAI 3.6.1.6-1.

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*3.6.2.4-2* *DOC A.1*
*CTS 3/4.6.2.2*
*STS 3.6.2.4 and Associated Bases*
*ITS 3.6.2.4 and Associated Bases*

*CTS 3/4.6.2.2 has been converted into the Improved Technical Specifications requirements using the guidance of NUREG-1433 for STS 3.6.2.4, Residual Heat Removal (RHR) Suppression Pool Spray. DOC A.1 states that this ITS is based upon the guidance provided in NUREG-1434 which contradicts with the presentation of the ITS markup.*

*Comment: Revise the DOC A.1 to be consistent.*

Licensee Response:

DOC A.1 will be modified to identify NUREG-1433 as the correct reference.

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*3.6.2.4-3* *DOC A.2*
*CTS 3.6.2.2 ACTION b and Associated* Footnote*
*ITS 3.6.2.4 ACTION C*

*See Comment Number 3.6.1.6-2*

*Comment: See Comment Number 3.6.1.6-2.*

Licensee Response:

See the NMP2 response to RAI 3.6.1.6-2.

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*3.6.2.4-6* *Bases JFD 6*
*ITS B3.6.2.4 Bases A.1 and B.1*

*See Comment Number 3.6.1.6-6.*

*Comment: See Comment Number 3.6.1.6-6.*

Licensee Response:

The concept described in the NMP2 response to RAI 3.6.1.6-6 applies. The word in ACTIONS A.1 and B.1 Bases should be "condition," not "Condition."

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*3.6.3.1-1* *DOC LA.2*
*Bases JFD 5*
*CTS 4.6.6.1.b.2*
*ITS SR 3.6.3.1.2 and Associated Bases*

*CTS 4.6.6.1.b.2 verifies the integrity of all heater electrical circuits by performing a resistance to ground test. The corresponding ITS SR is ITS SR 3.6.3.1.2. The details of when to perform this surveillance with regards to the other SRs in this specification and the acceptance criteria are to be relocated to the Bases. This is acceptable. However, ITS B3.6.3.1 Bases SR 3.6.3.1.2 contains an additional requirement on when to perform this surveillance which is not contained in the CTS. This requirement is "within 30 minutes following heatup of the system to normal operating temperature." The justification for this change (Bases JFD 5) characterizes the change as editorial. This is incorrect. The staff finds that this change is not part of the current licensing basis and is a generic change.*

Comment: *Delete this generic change.*

Licensee Response:

CTS 4.6.6.1.b.2 is required to be performed within 30 minutes following completion of the system functional test of CTS 4.6.6.1.a. The reason for this is to ensure that the heaters are at normal operating temperature prior to verifying there are no grounds on the heater elements. The system functional test of CTS 4.6.6.1.a requires a heatup of the hydrogen recombiner (using the heaters, since this is the only way the recombiner can be heated up), to its normal operating temperature of 1150 degrees F. The additional allowance in the Bases of ITS SR 3.6.3.1.2 performs the same basic function as requiring the system functional test; the heaters are at the proper temperature and have not cooled off too much. Therefore, this change is essentially editorial. In addition, this change has previously been approved by the NRC in the most recent BWR/5 ITS submittal, using the same justification.

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*3.6.3.1-3* *DOC L.2*
*JFD 2*
*JFD 3*
*Bases JFD 1*
*Bases JFD 2*
*Bases JFD 4*
*CTS 3.6.6.1 ACTION*
*STS 3.6.3.1 ACTION B and Associated Bases*
*ITS 3.6.3.1 ACTION B and Associated Bases*

*CTS 3.6.6.1 ACTION only permits one hydrogen recombiner to be inoperable. If two hydrogen recombiners are inoperable CTS 3.0.3 is entered. CTS 3.6.6.1 ACTION has been modified to incorporate STS 3.6.3.1 ACTION B which allows two hydrogen recombiners to be inoperable for up to 7 days. The use of STS 3.6.3.1 ACTION B is allowed, as specified in a Bases Reviewer's Note, provided that the alternate hydrogen control system is found to be*

*acceptable to the staff. DOC L.2 does not contain any evidence that the staff has approved an alternate hydrogen control system(s). There is no other LCO controlled hydrogen control system(s) in the ITS such as specified in the NUREGs. DOC L.2 refers to the "nitrogen inerting and purge system" and there is in ITS B3.6.3.1 Bases B.1 and B.2 a reference to "the primary containment vent, purge, and nitrogen system, both of which are not LCO controlled systems. Furthermore, there seems to be an interrelationship between the hydrogen control function and the RHR Drywell Spray System. The insert to ITS B3.6.1.6 Bases - BACKGROUND titled "Insert-BKGD" claims credit is taken for the turbulence induced by the sprays to ensure a well-mixed primary containment atmosphere during accident conditions which reduces potential for non-uniform hydrogen and oxygen concentrations. In addition some of the changes made to ITS B3.6.3.1 Bases - B.1 and B.2 do not make sense or conflict with each other in light of the above discussion.*

*Comment: Provide additional discussion and justification to show that the staff has found these alternate hydrogen control systems acceptable and how the RHR Drywell Spray System is part of the collective hydrogen control mitigation systems as NMP 2.*

Licensee Response:

The NRC has not approved an alternate hydrogen control for NMP2 since RG 1.7, Revision 2, only requires a combustible gas control system to be installed to control hydrogen. The NMP2 design includes redundant hydrogen recombiners which satisfy the requirements of RG 1.7. RG 1.7 specifically states that a containment purge system cannot be used as the primary method of controlling hydrogen after an accident, but that it should be capable of aiding in cleanup. The Note in the ISTS Bases did not mean that ACTION B could only be used if the NRC had previously accepted an alternate hydrogen control system, but that for it to be adopted as part of the ITS, the NRC needed to approve the licensee-provided alternate hydrogen control method. The NMP2 Vent and Purge System meets the RG 1.7 requirements. In combination with the inerting portion of the system, it can perform an alternate hydrogen control function (it can control oxygen and hydrogen). The NRC has previously reviewed and approved a similar method for the most recent BWR/5 ITS submittal. This method had not been previously approved for use prior to the ITS submittal, but was approved as part of the ITS submittal to be credited as a backup if both hydrogen recombiners were inoperable. Therefore, NMP2 believes that this is an acceptable method, and requests that the appropriate NRC personnel review the NMP2 design and approve this method for inclusion in the ITS. It should be noted that this method will not be the primary method for controlling hydrogen and oxygen, but is only being used to justify a 7 day Completion Time in the unlikely event that both hydrogen recombiners are inoperable.

The statement in the Bases for ITS 3.6.1.6 is describing that the drywell spray system is also credited as mixing the primary containment atmosphere following an accident to reduce the potential for a non-uniform hydrogen/oxygen concentration. It does not, in and of itself, control the hydrogen or oxygen concentration. In addition, only one drywell spray subsystem is required for the mixing function to be performed. Thus, if drywell spray system were required in the Bases for the alternate hydrogen control method, only one subsystem would be specified. The Bases did not discuss this requirement since a) it was a mixing function, not a control type (removal) function, and b) the ITS already required the drywell spray system to

be Operable, and with both subsystems inoperable, the ITS 3.6.1.6 ACTION requires restoration in 8 hours. With ITS 3.6.3.1 ACTION B requiring restoration of one hydrogen recombiner within 7 days, it did not seem necessary to describe the drywell spray system requirements (it would be unlikely that both drywell spray subsystems and both recombiners are inoperable at the same time, and even if so, entry into a shutdown action would be required within 8 hours by ITS 3.6.1.6 ACTION B). However, to ensure consistency is maintained within the ITS, and to account for the unlikely event that both drywell spray subsystems and both hydrogen recombiners are inoperable simultaneously, the ITS 3.6.3.1 ACTIONS B.1 and B.1 Bases will be modified to include a requirement that one subsystem of the drywell spray system must also be Operable.

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*3.6.3.1-4* *DOC L.2*
*JFD 3*
*Bases JFD 1*
*Bases JFD 2*
*Bases JFD 4*
*CTS 3.6.6.1 ACTION*
*ITS 3.6.3.1 ACTION B and Associated Bases*

*CTS 3.6.6.1 ACTIONS only permit one hydrogen recombiner to be inoperable. ITS 3.6.3.1 ACTION B permits both hydrogen recombines to be inoperable provided there is an alternate hydrogen control system available. ITS 3.6.3.1 ACTION B has been modified for two inoperable recombiner provided the alternate hydrogen control function is maintained. This verification is supposed to be performed within one hour and "once" per 12 hours thereafter per the ITS Bases for ACTION B. The proposed ITS states this verification is performed within one hour and "one" per 12 hours thereafter. See Comment Number 3.6.3.1-3.*

*Comment: Correct this discrepancy. Resolution related to Comment Number 3.6.3.1-3.*

Licensee Response:

This typographical error will be corrected. It should be noted that the typographical error is also in the ISTS 3.6.3.1 Required Action B.1 Completion Time (i.e., NUREG-1434, Rev. 1 needs to be corrected).

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*3.6.3.1-5* *DOC L.2*
*JFD 2*
*Bases JFD 1*
*CTS 3.6.6.1 ACTION*
*ITS 3.6.3.1 ACTION B and Associated Bases*

*CTS 3.6.6.1 ACTIONS only permit one hydrogen recombiner to be inoperable. ITS 3.6.3.1 ACTION B permits both hydrogen recombiners to be inoperable provided there is an alternate*

*hydrogen control system available. ITS 3.6.3.1 ACTION B has been modified to expand the purpose of the hydrogen recombiners role to perform a "hydrogen control" function to the "hydrogen and oxygen" control function. JFD 2 and Bases JFD 1 do not explain this STS change which appears to be an incorrect statement. Hydrogen recombiners directly remove free hydrogen and indirectly affect the relative percentage of hydrogen/oxygen concentration. There are many similar references in the proposed Bases that must be similarly corrected. The staff considers this change to be a generic change. See Comment Number 3.6.3.1-3.*

*Comment: Revise ITS markup(s) and Bases(s) to remove this generic change. See Comment Number 3.6.3.1-3.*

Licensee Response:

The ISTS Bases are written for a hydrogen control plant whereas NMP2 is an oxygen control plant. Controlling the amount of oxygen in the primary containment ensures that hydrogen is also controlled and an explosive mixture will not occur. The NMP2 combustible gas analysis assumptions maximize the amount of oxygen generated. The ITS and Bases were modified to reflect this NMP2 plant-specific analysis method. As such, this is not a generic change. The JFDs appear to be correct, since they both state that the changes were made due to plant specific information/analysis description. In addition, while reviewing the Bases during the generation of this RAI response, it was noted that, in one location, the term "oxygen" was not added when discussing the hydrogen control function. This will be corrected.

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*3.6.3.1-7* *Bases JFD 3*
*ITS B3.6.3.1 Bases - A.1*

*See Comment Number 3.6.1.6-6.*

*Comment: See Comment Number 3.6.1.6-6.*

Licensee Response:

The concept described in the NMP2 response to RAI 3.6.1.6-6 applies. The word in ACTIONS A.1 Bases should be "condition," not "Condition."

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*3.6.3.2-1* *DOC A.1*
*JFD 1*
*Bases JFD 1*
*CTS 3/4.6.6.2*
*ITS 3.6.3.2 and Associated Bases*

*CTS 3/4.6.6.2 has been converted into the Improved Technical Specification requirements using the guidance of NUREG-1433 for STS 3.6.3.3, Primary Containment Oxygen*

*Concentration. DOC A.1 states that this ITS is based upon the guidance provided in NUREG-1434 which contradicts with the presentation of the ITS markup.*

*Comment: Revise the DOC A.1 to be consistent.*

Licensee Response:

DOC A.1 will be modified to identify NUREG-1433 as the correct reference.

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*3.6.3.2-2 Bases JFD 3*
*STS B3.6.3.2 Bases - BACKGROUND*
*ITS B3.6.3.2 Bases - BACKGROUND*

*STS B3.6.3.3, Bases BACKGROUND, indicates that the hydrogen control function is met collectively by the hydrogen recombiners and the containment atmosphere mixing system or equivalent such as exists in a BWR/4 for a Drywell Cooling System Fan. There seems to be a similar type of function based on the interrelationship between the hydrogen control function and the RHR Drywell Spray System. The insert to ITS B3.6.1.6 Bases - BACKGROUND titled "Insert-BKGD" claims credit is taken for the turbulence induced by the sprays to ensure a well-mixed primary containment atmosphere during accident conditions which reduces potential for non-uniform hydrogen and oxygen concentrations.*

*Comment: Provide additional discussion and justification as to why the discussion in "Insert BKGD: should not be included here.*

Licensee Response:

This description of the drywell cooling system fans was deleted since NMP2 does not have a Technical Specification requirement for these fans. However, the drywell spray system is credited for performing the hydrogen mixing system. Therefore, the ITS 3.6.3.2 Bases will be modified to identify the drywell spray system.

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*3.6.4.1-1 DOC A.17 (CTS 1.0)*
*CTS 1.38.e*

*CTS 1.38 defines SECONDARY CONTAINMENT INTEGRITY. A markup of CTS 1.38 is provided in the CTS markup of CTS 1.0. DOC A.17 (CTS 1.0) states that the definition of SECONDARY CONTAINMENT INTEGRITY has been deleted from the CTS/ITS since the requirements are specifically addressed in the LCOs for Secondary Containment and Containment Systems Section of the ITS. This justification is not entirely correct. CTS 1.38.e states that "The sealing mechanism associated with each reactor building and auxiliary bay penetration (e.g., welds, bellows, or O-rings) is OPERABLE." The staff cannot find this requirement in any of the Containment System LCOs nor in their Associated Bases. If the*

*requirement has been incorporated into a separate LCO or SR, then the change is Administrative. However, if the requirement has been deleted, then the change is a Less Restrictive (L) change. If the requirement has been relocated to the Bases or other 10 CFR 50.59 controlled document, then the change is a Less Restrictive (LA) change.*

*Comment: Revise the CTS markup to correctly show the disposition of CTS 1.38.e and provide additional discussion and justification for this change.*

Licensee Response:

The definition of SECONDARY CONTAINMENT INTEGRITY is in CTS Chapter 1.0, and was dispositioned in Chapter 1.0 in DOC A.17. This disposition classifying the change as an "A" change has been reviewed and accepted by the NRC Reviewer for Chapter 1.0. This is also consistent with the most recent BWR/5 ITS submittal (WNP-2). Therefore, NMP2 believes the currently approved NRC disposition is correct and no changes are necessary.

The sealing mechanisms associated with each secondary containment penetration (e.g., welds, bellows, or O-rings) are considered OPERABLE provided the secondary containment is meeting its drawdown limit (i.e., 0.25 inch vacuum). This requirement is effectively covered by the statement in the 3.6.4.1 LCO section of the Bases that for the secondary containment to be OPERABLE, it must have adequate leak tightness to ensure that the required vacuum can be established and maintained. This is ensured by ITS SR 3.6.4.1.1, ITS SR 3.6.4.1.4, and ITS SR 3.6.4.1.5. Therefore, since the current sealing mechanism requirement is already fully covered by the ITS Bases description and Surveillance Requirements, there is no reason to add a specific description of the sealing mechanism requirement into the secondary containment Bases. It is noted that the sealing mechanism description for the primary containment will be added into the Bases (as described in the response to RAI 3.6.1.1-2) even though a similar reason for not including it was provided. However, this is being done because the ISTS Bases (Background section) has a full description of all facets of the CTS definition of PRIMARY CONTAINMENT INTEGRITY. This is not the case of the ISTS Bases for secondary containment; there is no similar description of the various facets of the CTS definition of SECONDARY CONTAINMENT INTEGRITY.

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*3.6.4.1-2* *DOC A.3*
*DOC M.1*
*JFD 2*
*Bases JFD 4*
*CTS 4.6.5.1.b.2*
*ITS SR 3.6.4.1.3 and Associated Bases*

*CTS 4.6.5.1.b.2 verifies at least one door in each access to the secondary containment is closed, except for normal entry and exit. ITS SR 3.6.4.1.3 modifies this requirement to require each inner door or outer door in each access opening to be closed. While the changes associated with DOC M.1 are acceptable, the changes associated with DOC A.3, JFD 2 and Bases JFD 4 are not in conformance with TSTF-18.*

*Comment: Licensee should update the submittal to conform to TSTF-18.*

Licensee Response:

TSTF-18, Rev. 1 had just been submitted for review when the NMP2 ITS was submitted but had not been approved by the NRC. NMP2 provided a Surveillance Requirement that was consistent with TSTF-18, Rev. 0, which was the most current revision at the time NMP2 stopped incorporating generic changes (TSTFs) into the submittal. NMP2 will revise the ITS portion of the submittal to be consistent with TSTF-18, Rev. 1, however, the Bases portion will be slightly modified to remove confusion as to what the actual Surveillance Requirement requires. As written, NMP2 believes that the Bases does not provide the necessary detail to properly understand the actual Surveillance Requirement; the Surveillance could inappropriately be interpreted to not require the proper doors in a three door opening to be closed.

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*3.6.4.1-3* ***DOC M.2***
***DOC L.1***
***JFD 3***
***Bases JFD 2***
***Bases JFD 5***
***CTS 4.6.5.1.c***
***ITS SR 3.6.4.1.4, SR 3.6.4.1.5 and Associated Bases***

*A number of changes have been made to CTS 4.6.5.1.c, ITS SR 3.6.4.1.4, ITS SR 3.6.4.1.5 and the Associated ITS Bases for these Srs. These changes are based on TSTF-322. While the staff agrees that the TSTF-322 changes have merit, the staff has recommended modifications to the proposed changes. In addition, one sentence in DOC L.1 and in ITS B3.6.4.1 Bases - SR 3.6.4.1.4 and SR 3.6.4.1.5 is not entirely correct and is confusing. The sentence is the one that states that; since this SR is a secondary containment integrity test, the inoperability of the Standby Gas Treatment System (SGTS) train does not constitute a failure of this SR. This SR serves two purposes. It verifies the secondary containment integrity and along with other SRs it verifies the capability of the SGTS to limit radioactive releases. The sentence only implies one purpose. In addition, the sentence implies that a system failure does not constitute a failure of the SR. This is not entirely true. There are three failure modes for this SR and the failure mode will determine which ACTIONS are to be taken. The failure modes are: a system inoperability, a building integrity inoperability and both a system and building integrity inoperability. The staff cannot approve incorporation of unapproved TSTFs, therefore the changes associated with TSTF-322 are unacceptable at this time.*

*Comment: Delete these changes.*

Licensee Response:

ITS SR 3.6.4.1.4 and SR 3.6.4.1.5 only have one purpose, and that is to verify the integrity of the secondary containment boundary. The tests are not needed to verify the Operability of

the SGT system. The Surveillances in ITS 3.6.4.3 verify the Operability of the SGT System. Specifically, ITS SR 3.6.4.3.1 ensures that each SGT subsystem can operate for 10 continuous hours. This encompasses the 1 hour run in ITS SR 3.6.4.1.5. ITS SR 3.6.4.3.2 requires SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP is located in ITS 5.5.7 and includes requirements to verify proper flow rate and differential pressure drops, as well as requirements to ensure the filters can perform their required function. ITS SR 3.6.4.3.3 verifies each SGT subsystem actuates on an initiation signal and ITS SR 3.6.4.3.4 verifies each SGT decay heat removal air inlet valve can be opened. These ITS 3.6.4.3 Surveillance Requirements fully ensure the SGT System can perform its required function, provided the secondary containment meets its leak tightness requirements. If all the SGT Surveillances are passed and the SGT System is OPERABLE, then the only way ITS SR 3.6.4.1.4 or ITS SR 3.6.4.1.5 can fail is if the secondary containment has a problem (i.e., a leak such that the required vacuum cannot be attained or maintained). Thus, the only reason for these two SRs is to verify OPERABILITY of the secondary containment; they are not needed to verify OPERABILITY of the SGT System. NMP2 made this change to the CTS and ITS to avoid confusion as to the correct LCO to enter if these two SRs are not met. Currently, if these two SRs in the CTS (CTS 4.6.5.1.c.1 and CTS 4.6.5.1.c.2) are not met solely due to an SGT subsystem being inoperable, then only the Actions in the SGT System Specification are entered; the Actions of the Secondary Containment Integrity Specification are not entered, since secondary containment integrity is still met. The proposed wording provided in the ITS maintains the current intent and requirements of the CTS. Therefore, NMP2 believes the changes should remain as presented.

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*3.6.4.1-6* *Bases JFD 3*
*STS B3.6.4.1 Bases - C.1, C.2 and C.3*
*ITS B3.6.4.1 Bases - C.1, C.2 and C.3*

*The third paragraph last sentence in STS B3.6.4.1 Bases - C.1, C.2 and C.3 states the following: "Therefore, in either case, inability to suspend movement... a reactor shutdown." ITS B3.6.4.1 Bases - C.1, C.2 and C.3 deletes this sentence and replaces it with "Insert C.1, C.2, and C.3." The insert does not seem to make sense, is confusing and the justification (Bases JFD 3) describes the change as a consistency change with other specifications. The staff finds that this change is not consistent with other STS Bases and that the STS wording is correct.*

Comment: *Delete this change.*

Licensee Response:

These words, which describe the purpose and meaning of an ACTIONS Note, were modified to be consistent with a request by an NRC reviewer during the review and approval phase of a recent BWR/4 ITS submittal. NMP2 agreed with the change because the existing words were confusing. As a result, these words have been modified in the NMP2 ITS Bases in all Bases locations that describe a similar Note. This change has been approved by the applicable NRC reviewer in all other cases. Therefore, NMP2 believes that to maintain consistency with all

other places where this type of Note is described, these words should be accepted. NMP2 has re-reviewed the words and finds that they are not changing the intent of the Note (i.e., the modification is administrative) and that the words are not confusing.

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*3.6.4.2-1* *DOC A.17 (CTS 1.0)*
*CTS 1.38.e*

*See Comment Number 3.6.4.1-1.*

*Comment: See Comment Number 3.6.4.1-1.*

Licensee Response:

See the first paragraph of the NMP2 response for RAI 3.6.4.1-1.

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*3.6.4.2-3* *DOC L.1*
*CTS 4.6.5.1.b.3*
*CTS 3.6.5.2 ACTIONS*
*ITS 3.6.4.2 ACTIONS*
*ITS SR 3.6.4.2 and Associated Bases*

*CTS 3.6.5.2 ACTIONS and CTS 4.6.5.1.b.3 have been modified, as proposed in ITS 3.6.4.2 ACTION Note 1 and ITS SR 3.4.6.2.1, Note 2, to intermittently permit opening closed secondary containment isolation valves under administrative controls. DOC L.1 bases this change predominately upon the fact it is acceptable for ITS 3.6.1.3. This is insufficient justification for this change.*

*Comment: Provide additional discussion and justification for this change based upon the features of the Secondary Containment that will be directly affected by the CTS change.*

Licensee Response:

Additional justification will be provided in DOC L.1.

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*3.6.4.2-4* *Bases JFD 1*
*ITS B3.6.4.2 Bases - BACKGROUND*

*The fourth paragraph of ITS B3.6.4.2 Bases - BACKGROUND is modified by the phrase "(which includes plugs, caps, and other suitable closure devices). " The justification provided for this change (Bases JFD 1) does not provide sufficient information with regards to the acceptability of these items as isolation devices. A similar type change was proposed in TSTF-*

*196 which was rejected by the staff. See Comment Numbers 3.6.1.3-15, 3.6.1.3-22 and 3.6.4.2-8.*

*Comment: Delete this change. See Comment Numbers 3.6.1.3-15, 3.6.1.3-22 and 3.6.4.2-8.*

Licensee Response:

The NMP2 design includes plugs, caps, and other suitable devices that isolate secondary containment penetrations. These types of devices perform a similar function as a blind flange. CTS 4.6.5.1.b.3 requires verification that secondary containment penetrations not capable of being isolated by Operable automatic dampers are isolated by manual valves, blind flanges, or deactivated automatic dampers in the closed position. For the penetrations isolated by plugs, caps, and other suitable devices, it is the NMP2 position that CTS 4.6.5.1.b.3 can be met using these plugs, caps, and other suitable devices, since NMP2 interprets that the term blind flanges includes these plugs, caps, and other suitable devices. The plugs, caps, and other suitable devices are within the test boundaries of the secondary containment drawdown tests of CTS 4.6.5.1.c.1 and CTS 4.6.5.1.c.2, thus they are properly leak tested. For consistency with current design and practice, and to ensure no misinterpretation occurs in the future as to the acceptability of using these devices, NMP2 added clarifying words to the Bases that the term blind flange also includes plug, caps, and other suitable devices. To ensure only the proper plugs, caps, and other suitable devices are used to meet ITS 3.6.4.2, the Bases will be modified to state that the plugs, caps, and other suitable devices are listed in the Technical Requirements Manual (TRM). The TRM is the location where the list of secondary containment isolation valves (SCIVs) is to be located, and changes to it are controlled by 10 CFR 50.59 (since the TRM will be referenced in the USAR). In addition, the term "other suitable devices" will be deleted from the Bases since these other suitable devices fall under the general term of a plug or a cap.

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*3.6.4.2-6 Bases JFD 1*
*STS B3.6.4.2 Bases - APPLICABILITY*
*ITS B3.6.4.2 Bases - APPLICABILITY*

*The last sentence in the second paragraph of STS B3.6.4.2 Bases - APPLICABILITY states the following: "Moving irradiated fuel assemblies in the [primary or secondary containment] may also occur in MODES 1, 2, 3." ITS B3.6.4.2 Bases - APPLICABILITY deletes this sentence. Based on descriptions in STS/ITS B 3.6 Bases the staff concludes that this is a true statement for secondary containment at NMP-2 and clarifies the paragraph discussion. Thus it should not have been deleted. In addition, the justification used for the deletion (Bases JFD 1) is inadequate.*

*Comment: Delete this change.*

Licensee Response:

While this statement in the ISTS 3.6.4.2 Applicability Bases is true, it is not needed to be stated in the Bases. This statement is also true for ISTS 3.6.4.1, Secondary Containment, and ISTS 3.6.4.3, Standby Gas Treatment System, which have the identical Applicability; however, it is not stated in the ISTS Applicability Bases for these two Specifications. Therefore, this statement was not included in the ITS 3.6.4.2 Applicability Bases in order to make the Applicability Bases for all three secondary containment related specifications the same, with respect to this issue. The JFD identified for this change should have been JFD 4 (change made for consistency with similar phrases in other parts of the Bases). The ISTS markup will be revised to show JFD 4 as the proper justification.

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*3.6.4.2-7 Bases JFD 4*
*ITS B3.6.4.2 Bases - D.1, D.2 and D.3*

*See Comment Number 3.6.4.1-6.*

*Comment: See Comment Number 3.6.4.1-6.*

Licensee Response:

See the NMP2 response to RAI 3.6.4.1-6.

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*3.6.4.2-8 Bases JFD 4*
*ITS B3.6.4.2 Bases - SR 3.6.4.2.1*

*See Comment Numbers 3.6.1.3-22 and 3.6.4.2-4.*

*Comment: See Comment Numbers 3.6.1.3-22, and 3.6.4.2-4 and apply to secondary containment.*

Licensee Response:

RAI 3.6.4.2-4 already applies to secondary containment isolation valves; see the NMP2 response to RAI 3.6.4.2-4.

The term "isolation devices" is implicitly defined in the ISTS. The Note for ISTS 3.6.4.2 Required Action A.2 uses the term "isolation devices". In this case, it is referring to the isolation devices described in ISTS 3.6.4.2 Required Action A.1; closed and de-activated automatic valves, closed manual valves, blind flanges. The Bases for this Note also use the term "devices." NMP2 was attempting to change those words in the Surveillance Requirement Bases to be consistent with the words in the Note of the Required Actions. However, NMP2 notes that the term "isolation devices" is not used in the Note of ISTS SR 3.6.4.2.1; thus, the

word "SCIVs" could be used in the Bases for the Surveillance without creating any misunderstanding. Therefore, in order to maintain consistency with the ISTS as much as possible in this area, the words "isolation devices" will be changed back to "SCIVs" in the Bases for ITS SR 3.6.4.2.1. Additionally, as stated above, the term "devices" is used in the Bases for Required Action A.2, but the term "isolation devices" is used in the actual Note. Therefore, to maintain consistency with the actual Note in Required Action A.2, and with similar terms in the PCIV Technical Specification (ITS 3.6.1.3), the submittal will be modified to use the term "isolation devices" in lieu of "devices."

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*3.6.4.2-9* *CTS 3.6.5.1 ACTIONS*
*CTS 4.6.5.1.b.3*
*ITS 3.6.4.2 ACTIONS*
*ITS SR 3.6.4.2.1 and Associated Bases*

*CTS 4.6.5.1.b.3 verifies that all penetrations not capable of being closed by OPERABLE automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions. The corresponding ITS SR for this CTS surveillance is ITS SR 3.6.4.2.1. If CTS 4.6.5.1.b.3 cannot be met, the ACTIONS of CTS 3.6.5.1 are entered which require restoration of valve OPERABILITY within 4 hours or shutdown with the following 36 hours when in MODES 1, 2, or 3 or immediate suspension of fuel handling, CORE ALTERATIONS and OPDRVs when in OPERATIONAL CONDITION*. If ITS SR 3.6.4.2.1 cannot be met, the ACTIONS of ITS 3.6.4.2 are entered which allows for one valve to be inoperable for up to 8 hours before shutdown commences or suspension of fuel handling, CORE ALTERATION or OPDRVS. This Less Restrictive change to the CTS is not justified.*

<u>Comment:</u> *Revise the CTS markup to show this Less Restrictive change and provide the appropriate discussions and justifications.*

<u>Licensee Response</u>:

When CTS 4.6.5.1.b.3 is not met, this does not directly result in entering the Actions of CTS 3.6.5.1. If a valve is open that is not allowed to be open, the Actions of CTS 3.6.5.2 are entered, not the Actions of CTS 3.6.5.1. CTS LCO 3.6.5.1 requires SECONDARY CONTAINMENT INTEGRITY to be maintained. CTS 1.38, which defines SECONDARY CONTAINMENT INTEGRITY, states, in part, that SECONDARY CONTAINMENT INTEGRITY exists when "All reactor building and auxiliary bay penetrations required to be closed during accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic valve or damper secured in its closed position, except as provided in Table 3.6.5.2-1 of Specification 3.6.5.2." Thus, when one of the two manual valves in a penetration is open, SECONDARY CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the Actions of CTS 3.6.5.1 do not have to be entered. With one of the two valves open, this valve would be declared inoperable and the Actions of CTS 3.6.5.2 would be entered. CTS 3.6.5.2 allows 8 hours to isolate the affected penetration. ISTS 3.6.4.2 ACTIONS are consistent with this 8 hour allowance. Therefore, since the current

time in the CTS to isolate a valve is consistent with the proposed time in the ITS to isolate a valve, no additional justification is necessary.

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*3.6.4.3-3* *Bases JFD 3*
*Bases JFD 4*
*ITS B3.6.4.3 Bases - A.1*
*ITS B3.6.4.3 Bases - C.1, C.2.1, C.2.2 and C.2.3*

*See Comment Number 3.6.1.6.-6*

*Comment: See Comment Number 3.6.1.6-6.*

Licensee Response:

The concept described in the NMP2 response to RAI 3.6.1.6-6 applies to the word in the ACTIONS A.1 Bases. The word in ACTIONS A.1 Bases should be "condition," not "Condition." The word in the Bases for ACTIONS C.1, C.2.1, C.2.2, and C.2.3 is not in any way describing a "Condition" in the ACTIONS Table; it is describing placing the unit in a "condition" where the LCO does not apply. Therefore, this change is a typographical error, as described by JFD 3.

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*3.6.4.3-4* *Bases JFD4*
*ITS B3.6.4.3 Bases C.1, C.2.1, C.2.2 and C.2.3*
*ITS B3.6.4.3 Bases E.1, E.2 and E.3*

*See Comment Number 3.6.4.1-6.*

*Comment: See Comment Number 3.6.4.1-6*

Licensee Response:

See the NMP2 response to RAI 3.6.4.1-6.

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