

February 29, 2000

MEMORANDUM TO: Stuart Richards, Project Director  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management, NRR

FROM: William D. Beckner, Chief */RA/*  
Technical Specifications Branch  
Division of Regulatory Improvement Programs, NRR

SUBJECT: TECHNICAL SPECIFICATIONS BRANCH COMMENTS ON  
INDUSTRY PROPOSAL FOR STANDARD TECHNICAL SPECIFICATIONS FOR PERMANENTLY DEFUELED BWR PLANTS

In your memorandum dated November 30, 1999, you requested the Technical Specifications Branch (RTSB) to provide comments on the October 12, 1999, industry proposal for standard technical specifications (TS) for permanently defueled boiling water reactor (BWR) plants. Our comments are the following:

1. The specification on spent fuel storage pool water level is the only limiting condition for operation (LCO) in the proposed standard TS. The purpose of this LCO is to protect the assumptions of the fuel handling accident design basis analysis. However, for a short time, following final plant shutdown, until the decay heat load is sufficiently small, other systems such as the spent fuel storage pool cooling mode of the residual heat removal system may be needed to remove the decay heat of the spent fuel assemblies in the storage pool. We recommend that the proposed TS include a reviewer's note which explains that the defueled TS may be implemented only after such systems are no longer needed to maintain pool temperature within normal limits.
2. No justification is given for omitting the explicit limits contained in STS 5.2.2.b on working hours of personnel who perform safety related functions. We recommend retaining the STS limits.
3. Proposed TS 5.5.4 gives the program name as the "[Spent Fuel Storage Pool] [and Upper Fuel Pool] Program." But proposed TS [3.7.1] is entitled "Fuel Pool Water Level." We recommend these titles be more consistent.
4. We suggest that proposed TS 5.5.4 specifically require that the program require meeting water chemistry limits given in the [appropriate FSAR section] and an explicit limit on  $K_{eff}$ .
5. The phrase in the second sentence in TS 5.5.4, "controls for monitoring and responding to the condition of the pool," could be interpreted too narrowly. We suggest revising the language to read "controls for monitoring and responding to abnormal conditions in the

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pool. [Abnormal pool conditions include pool level, temperature, chemistry, or specific activity outside normal limits, degradation or misplacement of a stored irradiated fuel assembly, degradation of a fuel storage rack, malfunction or degradation of fuel handling equipment, malfunction or degradation of the pool cooling and cleanup system, and malfunction or degradation of pool temperature, level, and radiation monitoring instrumentation.]”

6. The Bases for proposed TS 3.7.1 lack a section labeled “LCO” and are missing horizontal lines to separate the sections. Also, the Applicable Safety Analysis discussion in the Bases addresses the consequences of a fuel handling accident inside the auxiliary building. We suggest replacing “auxiliary building” with “[secondary containment]” which is more typical and would indicate that plant-specific terminology should be used. Similarly, instead of referring to the “building” atmosphere, we recommend referring to the “[secondary containment]” atmosphere.

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6. The Bases for proposed TS 3.7.1 lack a section labeled “LCO” and are missing horizontal lines to separate the sections. Also, the Applicable Safety Analysis discussion in the Bases addresses the consequences of a fuel handling accident inside the auxiliary building. We suggest replacing “auxiliary building” with “[secondary containment]” which is more typical and would indicate that plant-specific terminology should be used. Similarly, instead of referring to the “building” atmosphere, we recommend referring to the “[secondary containment]” atmosphere.

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