

August 10, 2000

Mr. James W. Davis, Director  
Operations Department, Nuclear Generation  
Nuclear Energy Institute  
1776 I Street, N. W., Suite 400  
Washington, D.C. 20006-3708

Dear Mr. Davis:

Your letter dated April 1, 2000 pointed out an unintended consequence of rewording proposed in TSTF-16 for Specification 3.8.9, "Distribution System - Operating." Under technical specification rules, inclusion of the phrase "that does not result in loss of function" in Conditions A, B, and C could in some scenarios result in "cycling" in and out of these conditions with the concomitant starting and stopping of "clocks," without actual change of operability of the affected subsystem(s). The net result is the potential to extend the completion time for recovering subsystem operability. After careful consideration, we prefer to remove the "that does not result in loss of function" language in the specified conditions.

With regard to the proposed change to Insert 3 for NUREG-1434 BWR/6), on review we feel that the insert in general does not adequately describe the circumstances under which a safety function can still be performed despite the loss of one or more subsystems in Division 1 or Division 2. In particular it seems appropriate to provide some acknowledgment of the role that Division 3 plays in the BWR/6 design in combination with Division 1 and 2. We request that the TSTF formulate an alternative insert.

Finally, please find enclosed our final markup for the other portions of the Bases. This provides a consolidation of comments, some of which are in addition to those provided at our meeting on July 13, 2000.

Sincerely,

*/RA/*

William D. Beckner, Chief  
Technical Specifications Branch  
Division of Regulatory Improvement Program, NRR

Enclosure: As stated

cc: J. Arbuckle, BWROG  
T. Weber, CEOG  
N. Clarkson, BWOOG  
S. Wideman, WOG  
D. Hoffman, EXCEL  
V. Gilbert, NEI  
Project No. 689

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