



NUCLEAR ENERGY INSTITUTE

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Dr. William D. Beckner, Branch Chief
Technical Specifications Branch
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Forwarding of TSTFs and Updated TSTF Status

PROJECT NUMBER: 689

Dear Dr. Beckner:

Enclosed for NRC consideration are the following NEI Technical Specification Task Force (TSTF) Travelers:

- TSTF-400, Rev. 0 - Clarify SR on Bypass of DG Automatic Trips
- TSTF-401, Rev. 0 - Revise Incorrect Bases for Containment Air Temperature
- TSTF-402, Rev. 0 - Clarification of "Required Features" in 3.8.1 Actions
- TSTF-403, Rev. 0 - LCO 3.6.2.5 and 3.6.3.3 Applicability
- TSTF-404, Rev. 0 - SDV Actions
- TSTF-405, Rev. 0 - Remove Bases Reference to Hydrotest Requirement to Gag SRVs
- TSTF-406, Rev. 0 - Predicting End-Of-Cycle MTC and Deleting Need for End-Of-Cycle MTC Verification All Cases
- TSTF-407, Rev. 0 - Extending ESFAS Subgroup Relay Test Intervals
- TSTF-408, Rev. 0 - Relocation of LTOP Enable Temperature and PORV Lift Setting to the PTLR
- TSTF-409, Rev. 0 - Containment Spray System Completion Time Extension
- TSTF-410, Rev. 0 - Relocation of Steam Generator Level - High Trip to the TRM
- TSTF-411, Rev. 0 - Surveillance Test Interval Extensions for Components of the Reactor Protection System

Please note that all Travelers starting with TSTF-400 will be marked on pages from Revision 2 of the ITS NUREGs and will be prioritized using a methodology similar to that described at the January 19, 2001 meeting between the TSTF and the NRC. A description of the methodology used to prioritize the Travelers is included as Attachment I.

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The TSTF withdraws the following TSTF Travelers from NRC consideration:

- TSTF-120, Rev. 0 - Simplify Fuel Oil Sampling
- TSTF-240, Rev. 0 - Eliminate Unnecessary Actions to Restore Compliance with the LCO
- TSTF-250, Rev. 0 - Delete Specific FSAR Section References
- TSTF-267, Rev. 0 - Add a Section 1.4 Example of Frequency Based on Plant Conditions
- TSTF-346, Rev. 0 - Revise 3.8.1 Actions to Allow Time to Cooldown Under Natural Circulation

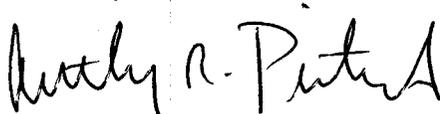
The TSTF accepts the NRC's rejection of the following TSTF Travelers:

- TSTF-21, Rev. 1 - Make RHR - Low Water Level Surveillances consistent between PWR NUREGs
- TSTF-113, Rev. 4 - Eliminate Shutdown to MODE 4 for inoperable PORVs
- TSTF-141, Rev. 1 - Delete the Mode 2 Applicability for Reactivity Balance
- TSTF-213, Rev. 0 - Eliminate Extraneous Verbiage From the Definition Of CONTROL RODS
- TSTF-228, Rev. 0 - Revise RHR Applicability
- TSTF-251, Rev. 0 - Eliminate TS 5.5.6, Pre-Stressed Concrete Containment Tendon Surveillance Program

In the letter from the NRC to the TSTF dated May 4, 2001, the NRC proposed adding a new section to the Bases of each ITS Specification, which details the revision history. The TSTF supports this proposal and offers some suggestions for improvement. Attachment 2 contains the suggested revisions. We recommend titling the section "Revision History" and listing the revision number for each change so that it is clear in which revision each Traveler was incorporated.

Please contact me at (202) 739-8081 or Mike Schoppman at (202) 739-8011 if you have any questions or desire further communication regarding these recommended changes.

Sincerely,



Anthony R. Pietrangelo
ARP/mas

Enclosure
Attachments

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cc: Noel Clarkson, B&WOG
Steve Wideman, WOG
John Arbuckle, BWROG
Tom Weber, CEOG
Donald Hoffman, EXCEL Services Corporation

Attachment 1

In order to ensure that all generic changes proposed by the Industry and reviewed by the NRC are processed in a timely and efficient manner, it is necessary to prioritize those changes. There are two criteria for prioritization: 1) benefit to operation or safety, and 2) number of plants that indicate they would adopt the change when approved.

PRIORITY RANKING

Benefit \ Adoption	Significant Adoption	General Adoption	Minimal Adoption
Large Benefit in Operation and / or Safety			Medium
Moderate Benefit in Operation and / or Safety	Medium	Medium	Medium
Minimal Benefit in Operation or Safety	Medium		

Each category used in the Table is discussed below.

Benefit Categories

Large Benefit in Operation and / or Safety This category of change would include items that provide substantial operational cost savings or significantly improves safety. Examples of this type of generic change for operational savings are implementation of Appendix J, Option B, the relaxation of shutdown containment closure in TSTF-51, and TSTF-360 improvements in batteries and D.C. distribution. An example of large benefit in safety is the clarifications of the Channel Calibration definition in TSTF-205. These changes are typically large, general changes in the ISTS. A general rule of thumb for "large benefit in operation" is that this type of change is expected to save a plant over \$100,000 over the life of the plant after adoption.

Moderate Benefit in Operation and / or Safety This category of change would include items that provide moderate operational cost savings or moderately improve safety. Examples of this type of generic change for operational savings are extended Completion Times and Surveillance Frequencies. An example of a moderate safety benefit would be providing an appropriate action when an LCO 3.0.3 entry and eventual unit shutdown would otherwise be required.

Minimal Benefit in Operation or Safety This category of change would include items that provide minimal operational cost savings or marginally improve safety. Examples of this type of generic change include clarifying existing Required Actions or Surveillances to make their intent clear, and correcting usage errors in the ISTS. These changes are important to maintain the ISTS and plant-specific ITS correct, complete, and consistent.

Attachment 1

Adoption Categories

Significant Adoption	This category of change represents generic changes for which a large fraction (approximately two-thirds, or more) of the plants to which the change is applicable have indicated a desire to adopt the change after approval.
General Adoption	This category of change represents generic changes for which a majority of the plants to which the change is applicable have indicated a desire to adopt the change after approval.
Minimal Adoption	This category of change represents generic changes for which a small fraction (approximately one-third, or less) of the plants to which the change is applicable have indicated a desire to adopt the change after approval.

Application of Priorities

Editorial changes, changes which only affect the ITS Bases, and changes which only affect the ITS NUREGs will not be prioritized as described above. Prioritization is based in part on plant adoption. It's unlikely that a plant would process a license amendment to adopt an editorial change to the ITS. Bases changes do not require a license amendment. Changes that only affect the ITS NUREGs (such as adding a Reviewer's Note) would not, by definition, be adopted by plants. As these types of changes do not fall under the prioritization scheme, they will be given a priority of "Edit / Bases."

In order to avoid a situation in which all resources are expended processing high priority changes, the Industry will assign the category sparingly. This may require changing the priority of a generic change under NRC consideration to "make way" for a higher priority change. It is expected that in an equilibrium condition and over a fiscal year, the Industry and the NRC will expend their available resources to address the high, medium, and low priority changes as resources are available.

Schedule

The Industry and the NRC will periodically review the list of pending travelers to assess the implementation of this priority process. The goal will be to resolve high priority changes within 6 months after receipt by the NRC, medium priority changes within 12 months, and low priority items within 18 months. The Industry and the NRC should work to ensure that no generic changes remain under NRC review for greater than 18 months.

Attachment 2

The TSTF proposes the following format for tracking the revision history of the ITS NUREGs.

REVISION HISTORY

REVISION	TSTF	DESCRIPTION	APPROVED
2.1	TSTF-xxx, R.x	Will be taken from the title of the Traveler	00/00/02
2.1	TSTF-xxx, R.x	Will be taken from the title of the Traveler	00/00/02
2.2	TSTF-xxx, R.x	Will be taken from the title of the Traveler	00/00/02
2.2	TSTF-xxx, R.x	Will be taken from the title of the Traveler	00/00/02
2.2	TSTF-xxx, R.x	Will be taken from the title of the Traveler	00/00/02
2.3	TSTF-xxx, R.x	Will be taken from the title of the Traveler	00/00/02