

November 15, 2001

Mr. Tony Pietrangelo
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

SUBJECT: RISK INFORMED EXTENSIONS OF TECHNICAL SPECIFICATION
COMPLETION TIMES

Mr. Pietrangelo:

The purpose of this letter is to bring to your attention a staff concern identified during the review of Topical Reports WCAP-15622, "Risk Informed Evaluation of Extensions to AC Electrical Power Systems" (TSTF-417) and CE NSPD-1045, "Joint Applications Report, Modification to the Containment Spray System, and the Low Pressure Safety Injection System Technical Specifications." (TSTF-409).

These vendor reports contain analysis used to propose standard technical specification (STS) changes which extend times to complete required remedial actions when TS required systems become inoperable. These times are being adjusted based on risk informed analysis. Of concern are completion times that use the STS compound "AND" format to limit the total outage time for failure to meet the LCO based on time of first entry. The staff identified that incremental increases in the "discovery of failure to meet the LCO" allowances are proposed by adding risk informed times to the deterministic times currently in STS without appropriate analysis. In all cases the deterministic completion times are standards for improved STS and as such these values have wide application throughout the industry. RTSB supports industry efforts to risk inform TS; however, it is worthwhile to note that during discussion of staff comments on WCAP-15622, the staff advised the Westinghouse Owners Group that proposing increases in STS completion time limits by adding together risk informed and deterministic values using engineering judgement will not be approved. The risk analysis needs to encompass the entire outage time contemplated, including the upper limit provided for multiple condition entries.

Sincerely,

/RA/

William D. Beckner, Chief
Technical Specifications Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

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