

May 9, 2002

Mr. Anthony R. Pietrangelo, Director  
Risk & Performance Regulation  
Nuclear Generation Division  
Nuclear Energy Institute  
1776 Eye Street, N.W.  
Suite 400  
Washington, DC 20006-2496

Dear Mr. Pietrangelo:

After consultation with the Technical Specification Task Force (TSTF) we are closing our review of TSTF-254, Rev. 1 while you reconsider the industry proposal.

By letter dated March 12, 1998, the Nuclear Energy Institute's (NEI) TSTF proposed changes to Improved Technical Specification (TS) NUREG's 1430, 1431, 1432, 1433, and 1434, Surveillance Requirements (SR) 3.8.1.5 and 3.8.3.5. The proposed changes would have stricken SR 3.8.1.5 and SR 3.8.3.5 from the TS. These SRs require licensees to check for and remove accumulated water from each emergency diesel generator day tank and storage tank on a 31-day cycle. In subsequent meetings and correspondence between the Nuclear Regulatory Commission staff and TSTF representatives, the staff stated that the deletion of the two SRs was not acceptable; however, the staff stated a willingness to consider another submittal by the TSTF to extend, from 31- to 92-days, the surveillance frequency for each SR. By letter dated July 22, 1999, the TSTF revised the original proposal. The revision proposed the extension of the frequency of the surveillance, provided individual licensees could ensure that operational experience supports such a reduction. However, the revised proposal referred to only SR 3.8.1.5. The proposal was silent on SR 3.8.3.5. The staff requested clarification from the TSTF as to why SR 3.8.3.5 was excluded from the revised TSTF traveler.

If you have any questions, please contact Robert Dennig at (301) 415-1156 or e-mail [rld@nrc.gov](mailto:rld@nrc.gov).

Sincerely,

*/RA/*

William D. Beckner, Program Director  
Operating Reactor Improvements Program  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

cc: J. Arbuckle, BWROG  
D. Bice, CEOG  
N. Clarkson, BWOG  
S. Wideman, WOG  
D. Hoffman, EXCEL

May 8, 2002

Mr. Anthony R. Pietrangelo, Director  
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Nuclear Generation Division  
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NAME	RLDennig	WDBeckner		
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