

August 12, 2002

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

Dear Mr. Pietrangelo:

This is to inform you of the staff disposition of NEI Technical Specification Task Force (TSTF) traveler TSTF-416, Revision 0, "LPCI Valve Alignment Verification Note Location" for changes to Standard Technical Specification (STS) NUREG-1433 and NUREG-1434.

The staff approves traveler TSTF-416 which proposes moving the LPCI valve alignment verification notes in SR 3.5.1.2 and SR 3.5.2.4 to LCO 3.5.1 and LCO 3.5.2, respectively. The LPCI valve alignment notes credit, as operable, those portions of the LPCI subsystems that operate with the RHR in the decay heat removal, if the LPCI subsystems are capable of being manually aligned and are otherwise operable. The safety evaluation is included with this package as supporting information.

This completes our review of the above TSTF. Please contact Robert Dennig at (301) 415-1156 or e-mail rlid@nrc.gov if you have any questions or need further information on these dispositions.

Sincerely,

/RA/

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

Enclosure: As stated

cc: J. Arbuckle, BWROG
D. Hoffman, EXCEL

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NAME	PCHearn	RLDennig	WDBeckner
DATE	08/12/2002	08/12/2002	08/12/2002

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE REVIEW OF TSTF-416, "LPCI VALVE ALIGNMENT NOTE LOCATION"

1.0 INTRODUCTION

The Nuclear Energy Institute (NEI) Technical Specification Task Force (TSTF) has proposed a generic change to the standard technical specifications (STS) (NUREG-1433 and 1434) on behalf of the industry. This proposed technical specifications (TS) change, identified by TSTF-416 Rev. 0, will move the LPCI valve alignment verification notes to LCO 3.5.1 and LCO 3.5.2 from SR 3.5.1.2 and SR 3.5.2.4, respectively. In addition appropriate TS Bases changes are proposed. This generic change is needed to ensure the alignment verification note in the TS is applied to the components shared by the LPCI/RHR subsystems and not the only to shared valves.

2.0 BACKGROUND

SR 3.5.1.2 and SR 3.5.2.4, surveillances for the verification of proper valve alignment (position), have a note that allows both LPCI subsystems (SR 3.5.1.2 Note) or one LPCI subsystem (SR 3.5.2.4 Note) to be considered operable during alignment and operation for decay heat removal, if the subsystems are capable of being manually realigned and are otherwise operable. The note to SR 3.5.1.2 also has a restriction that the note is only applicable with reactor steam dome pressure less than the residual heat removal cut-in permissive pressure in Mode 3. These notes were added to allow the LPCI subsystems to be considered operable when the RHR System is being used for shutdown cooling.

The Limiting Conditions for Operation (LCO) Bases for LCO 3.5.1 and LCO 3.5.2 state that an LPCI subsystem is considered operable during alignment or during operation for decay heat removal.

3.0 EVALUATION

Presently the SR 3.5.1.2 and SR 3.5.2.4 notes apply to all LPCI/RHR subsystem shared components however these notes are located in the surveillance requirements that only address valve operability. The preferred location for these notes is in the LCO because the LCOs apply to the components of the shared portions of the LPCI/RHR subsystem. TSTF-416 does not change the design or function of any safety or non-safety related systems or components previously reviewed by NRC staff and found acceptable. As such, moving the valve alignment notes is an administrative change.

The NRC finds the proposal to move the LPCI valve alignment notes to the LCOs from the SRs consistent with the format and content of the other STS. Notes in NUREG-1430 and NUREG-1431 are similarly located in LCO 3.5.3. These changes cover NUREG-1433 and NUREG-1434. The NRC staff concludes that the proposed TSTF-416, Revision 0 changes are acceptable.

Enclosure