

September 6, 2002

Mr. Anthony R. Pietrangelo, Director
Risk & Performance-Based Regulation
Nuclear Generation
Nuclear Energy Institute
1776 I Street, N.W.
Suite 400
Washington, DC 20006-3708

Dear Mr. Pietrangelo:

This is to inform you of the disposition for traveler TSTF-408 containing proposed changes to the Combustion Engineering (CE) Standard Technical Specifications (STS) NUREG-1432, Revision 2, initiated by the NEI Technical Specification Task Force (TSTF). TSTF-408 is approved.

The staff has reviewed traveler TSTF-408 to the CE STS, NUREG-1432, Revision 2, which proposes relocation of the low temperature overpressure protection (LTOP) system enable temperature and the LTOP PORV lift setting to the pressure temperature limits report (PTLR), and associated changes to PTLR Administrative Controls Specification. Approved Topical Report CE NPSD-683, Revision 6, "Development of a RCS Pressure and Temperature Limits Report for Removal of P-T Limits and LTOP Requirements from the Technical Specifications," supports relocation of the LTOP system enable temperature and the LTOP PORV lift setting to the PTLR. Enclosed for your information is the related safety evaluation. Although the safety evaluation is written in the form of a model, TSTF-408 will not go through the CLIIP process.

Please contact me at (301) 415-1161 or email wdb@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

Enclosures: As stated

cc: T. Silko, BWROG
D. Bice, CEOG
N. Clarkson, BWOOG
S. Wideman, WOG
D. Hoffman, EXCEL

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DATE	08/30/2002	09/03/2002	09/05/2002	09/06/2002

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**MODEL SAFETY EVALUATION ON RELOCATION OF
LTOP ENABLE TEMPERATURE AND PORV LIFT SETTINGS TO
THE PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)**

SAFETY EVALUATION BY
THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO
AMENDMENT NO. ___ TO FACILITY OPERATING LICENSE NFP-___
[UTILITY NAME]
[PLANT NAME], [UNIT ___]
DOCKET NO. 50-___

1.0 INTRODUCTION

By letter dated_____, 20_, [utility name] (the licensee) proposed changes to the technical specifications (TS) for [plant name]. The requested changes are to relocate the low temperature overpressure protection (LTOP) system enable temperature and the LTOP PORV lift setting pressure to the pressure temperature limits report (PTLR) and the referencing of the related specifications in the PTLR administrative controls section of the TS. The proposed changes are consistent with the approved Technical Specification Task Force (TSTF) change traveler TSTF-408 to the Combustion Engineering (CE) Standard Technical Specifications (STS), NUREG-1432, Revision 2. Approved Topical Report CE NPSD-683, Revision 6, "Development of a RCS Pressure and Temperature Limits Report for Removal of P-T Limits and LTOP Requirements from the Technical Specifications," supports relocation of the LTOP system enable temperature and the LTOP PORV lift setting to the PTLR.

Guidance on the use of a PTLR was developed by the Nuclear Regulatory Commission (NRC) and was provided to all power reactor licensees and applicants by Generic Letter 96-03, dated January 31, 1996.

NUREG-1432, Revision 2, is written assuming that the pressure/temperature limits are located in a PTLR. However, other changes are required to NUREG-1432 to support this use of the Topical Report and TSTF-408. Specifically, the following changes are proposed to NUREG-1432:

1. Revise the PTLR definition to not state which Specifications contain limits specified in the PTLR. This information is located in Administrative Control 5.5.6, PTLR, and need not be repeated in Section 1.1
2. Eliminate the value of the LTOP enable temperature and LTOP PORV lift setpoint and substitute a reference to the PTLR in LCO 3.4.6, LCO 3.4.7, LCO 3.4.10, Required Action 3.4.10.B.2, LCO 3.4.12, Applicability 3.4.12, and Surveillance Requirement 3.4.12.6.
3. Revise Administrative Controls Specification 5.6.6 to include reference to NRC approved Topical Report CE NPSD-683, Revision 6. (Note: TSTF-408 assumes the plant has adopted approved TSTF-419, which is consistent with the wording approved for the Core Operating Limits Report in TSTF-363.)

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act (the Act) requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories: (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls, and states also that the Commission may include such additional TS as it finds to be appropriate. However, the regulation does not specify the particular requirements to be included in a plant's TS.

Currently 10 CFR 50, Appendix G imposes special fracture toughness requirements on the ferritic components of the Reactor Coolant Pressure Boundary. These fracture toughness requirements result in pressure restrictions which vary with RCS temperature. Determination of these restrictions requires that specific loading conditions be evaluated and the resulting P-T limits not be exceeded.

NRC Generic Letter 96-03, "Relocation Of The Pressure Temperature Limit Curves And Low Temperature Overpressure Protection System Limits," dated January 31, 1996, allows licensees to relocate the pressure temperature (P-T) limit curves from their plant TS to a PTLR or a similar document. The LTOP system limits were also allowed to be relocated to the same document. The methodology used to determine the P-T and LTOP system limit parameters must comply with the specific requirements of appendices G and H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR), be documented in an NRC approved topical report or in a plant-specific submittal, and be incorporated by reference into the TS.

Topical Report CE NPSD-683 Revision 6, "Development of a RCS Pressure and Temperature Limits Report for Removal of P-T Limits and LTOP Requirements from the Technical Specifications," provides the approved methodology which may be referenced in moving items to the PTLR.

3.0 TECHNICAL EVALUATION

All components of the reactor coolant system (RCS) are designed to withstand the effects of cyclic loads resulting from system pressure and temperature changes. These loads are introduced by heatup and cooldown operations, power transients, and reactor trips. In accordance with Appendix G to 10 CFR Part 50, TS limit the pressure and temperature changes during RCS heatup and cooldown within the design assumptions and the stress limits for cyclic operation. These limits are defined by P-T limit curves for heatup, cooldown, LTOP, and inservice leak and hydrostatic testing. Each curve defines an acceptable region for normal operation. The curves are used for operational guidance during heatup and cooldown maneuvering, when pressure and temperature indications are monitored and compared to the applicable curve to determine that operation is within the allowable region.

Topic Report CE NPSD-683 Revision 6, "Development of a RCS Pressure and Temperature Limits Report for Removal of P-T Limits and LTOP requirements from the Technical Specifications," provides a methodology for licensees to relocate the Pressure-Temperature (P-T) limit curves, low temperature overpressure protection (LTOP) setpoint values (including PORV lift settings) and curves, currently contained in the Technical Specifications (TS) to a licensee-controlled document. The approach is based upon the guidance contained in Nuclear Regulatory Commission (NRC) Generic Letter (GL) 96-03.

[Reviewer's Note: Topical Report CE NPSD-683, Revision 6, as supplemented by the CEOG letters of November 16 and 30, 2000, provides a methodology that may be used by licensees as the basis for establishing P-T limits and LTOP system limits, including PORV lift settings. While the contents of the report are technically acceptable, the report leaves the description of certain key methodology details up to the licensee to provide. These items have been identified in Sections 2.0 and 5.0 of the NRC's approving Safety Evaluation of February 28, 2001, for Topical Report CE NPSD-683, Revision 6. Licensees requesting a license amendment to adopt this change will need to include these details, along with a description of the plant's LTOP system, in their plant specific submittals. In some cases a licensee may need to apply for an exemption to the requirements of Appendix G to 10 CFR 50.]

The LTOP system controls RCS pressure at low temperatures so that the integrity of the reactor coolant pressure boundary is not compromised by violating 10 CFR Part 50, Appendix G. The LTOP system is reevaluated each time the P-T limit curves are revised to ensure that it meets its intended function.

Relocation of the P-T curves and LTOP setpoints does not eliminate the requirement to operate in accordance with the limits specified in Appendix G to 10 CFR Part 50. The requirement to operate within the limits in the named report or PTLR is specified in and controlled by the TS. Only the figures, values, and parameters associated with the P-T limits and LTOP setpoints are to be relocated to the PTLR. In order for the curves and setpoints to be relocated to a PTLR, a methodology for their development must be reviewed and approved in advance by the NRC. The methodology to be approved by the NRC is to be developed in accordance with GL 96-03. This generic letter delineates the requirements for both the methodology and the PTLR including, but not limited to, the requirements of Appendix G to 10 CFR Part 50. The PTLR review process requires that changes to the methodology be approved by the NRC. New and different methodologies that require changes to the base reference in the Administrative Controls section of the Technical Specifications must be approved by license amendment. Further, when changes are made to the figures, values, and parameters contained in the PTLR, the PTLR is to be updated and submitted to the NRC upon issuance.

On this basis, the NRC staff concludes that the licensee provided an acceptable means of establishing and maintaining the detailed values of the P-T limit curves and LTOP system limits. Further, because plant operation continues to be limited in accordance with the requirements of Appendix G to 10 CFR Part 50, and the P-T and LTOP system limits in the TS will be established using a methodology approved by the NRC, these changes will not impact plant safety.

The staff also concludes that the relocated requirements discussed above relating to the P-T limits and LTOP system limits are not required to be in the TS under 10 CFR 50.36 or Section 182a of the Atomic Energy Act. Accordingly, the staff concludes that the proposed changes are acceptable and that these requirements may be relocated from the TS to the PTLR.

4.0 STATE CONSULTATION

The Commission consulted with the State of []. No public comments were received, and the State of [] did not have any comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment involves changes to requirements with respect to use of facility components located within the restricted area, as defined in 10 CFR Part 20, changes with respect to surveillance requirements, and changes in administrative procedures or requirements. The NRC staff determined that the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released off site and that there is no significant increase in individual or cumulative occupational exposure. The Commission made a determination that the amendment involves no significant hazards consideration, which was published in the Federal Register (FR) on ___, 20__, and there has been no public comment regarding such a finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

On the basis of the considerations discussed above, the NRC staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: ___, 20__