

October 10, 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:

This is to inform you of the staff disposition of NEI Technical Specification Task Force (TSTF) traveler TSTF-434, "Clarifying SR 3.0.1 Bases to state that the Surveillance can be performed in steps" for changes to Standard Technical Specification (STS) NUREG-1430, NUREG-1431, NUREG-1432, NUREG-1433 and NUREG-1434.

The staff approves traveler TSTF-434 which proposes to revise SR 3.0.1 to state that Surveillances may be performed by means of any series of sequential, overlapping or total steps. The definitions related to instrument testing, such as CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and CHANNEL OPERATIONAL TEST, contain a sentence that states the test may be performed by any series of sequential, overlapping or total steps. However the inclusion of explicit allowances for the CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and CHANNEL OPERATIONAL TEST could be erroneously construed to be a violation of the Surveillance Requirements that do not address this allowance. TSTF-434 remedies the potential confusion that may arise due the omission of this allowance. The safety evaluation is included with this package as supporting information.

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

Sincerely,

/RA/

Robert L. Dennig, Section Chief
Technical Specifications Section
Operating Reactor Improvements Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: Tom Silko, BWROG
Steve Wideman, WOG
Paul Infanger, BWOOG
David Brice, CEOG
D. Hoffman, EXCEL

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DATE	10/08/2002	10/10/2002	

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE REVIEW OF TSTF-434, "CLARIFYING SR 3.0.1 BASES TO STATE THAT
SURVEILLANCE CAN BE PERFORMED IN STEPS"

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-1430, 1431, 1432, 1433 and 1434) on behalf of the industry. This proposed technical specifications (TS) change, identified by TSTF-434, will revise the SR 3.0.1 Bases to state that Surveillances may be performed by means of any series of sequential, overlapping and total steps.

2.0 BACKGROUND

The definitions related to instrument testing, such as CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and CHANNEL OPERATIONAL TEST, contain a sentence that states the test may be performed by any series of sequential, overlapping or total steps. However the inclusion of explicit allowances for the CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and CHANNEL OPERATIONAL TEST could be erroneously construed to be a violation of the Surveillance Requirements that do not address this allowance.

3.0 EVALUATION

Surveillances are performed by means of any series of sequential, overlapping or total steps as long as the entire Surveillance is performed as specified in the Technical Specifications. Performing the Surveillances in this manner reflects the industry practice and provides for the avoidance of unnecessary actuation of equipment that should not be run during power operation, improvement in scheduling and resources management and reduction of risk by scheduling test when the equipment is out of service.

The NRC finds that the proposal to revise the SR 3.0.1 Bases to state that Surveillances may be performed by means of any series of sequential, overlapping and total steps is consistent with the format and content of the other STS. These changes cover NUREG-1430, NUREG-1431, NUREG-1432, NUREG-1433 and NUREG-1434. Based on the above the NRC staff concludes that the proposed SR 3.0.1 changes in TSTF-434 are acceptable.

Enclosure