

October 11, 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-440, "Eliminating Bases Requirement for Performing a System Walkdown" for changes to Standard Technical Specification (STS) NUREG-1430, NUREG-1431 and NUREG-1432. The staff approves traveler TSTF-440 which proposes to allow other means in addition to a system walkdown to verify valve position.

The proposed revision deletes the words "through a system walkdown" from the Bases when referring to the verification of valve position. TSTF-440 remedies the duplicity involved in verifying a valve's position by a system walkdown when the valve's position is indicated in the Control Room. 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 [rlid@nrc.gov](mailto:rlid@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 Bice, CEOG  
D. Hoffman, EXCEL

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DATE	10/10/2002	10/11/2002	

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO THE REVIEW OF TSTF-440, "ELIMINATE BASES REQUIREMENT FOR  
PERFORMING A SYSTEM WALKDOWN"

## 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 and 1432) on behalf of the industry. This proposed technical specifications (TS) Bases change, identified by TSTF-440, will revise Bases 3.6.3, 3.6.6 and 3.6.7 to remove the words "through a system walkdown" from the valve position verification discussion.

## 2.0 BACKGROUND

Bases 3.6.3, 3.6.6 and 3.6.7 presently require verification of valve position through a system walkdown. This leads to inefficient resource usage since valve position can often be verified by more efficient means, such as, valve position indication in the control room.

## 3.0 EVALUATION

The proposed change revises the Bases of the Specifications 3.6.3, 3.6.6 and 3.6.7 to permit means in addition to system walkdowns to verify valve position. This revisions results in improving the flexibility in the performance valve position verifications. While a system walkdown may still be used to meet the required verification that valves are in the correct position, other methods, such as the use of remote valve position indication still meet the intent of the Specifications without increased personnel dose exposure.

This revision does not affect any safety analysis assumptions and does not alter any methods of plant operation. The proposed revisions do not change the intent of the Technical Specifications or Bases. These changes cover NUREG-1430, NUREG-1431, and NUREG-1432.

The NRC staff concludes that the proposal to permit additional means for verifying valve position is acceptable because of the improvement in operational flexibility and the potential reduction in personnel exposure.