

October 21, 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-438, "Clarifying Exception Notes to be Consistent with the Requirement Being Excepted" for changes to Standard Technical Specification (STS) NUREG-1430, NUREG-1431, NUREG-1432, NUREG-1433 and NUREG-1434. The staff approves traveler TSTF-438 which proposes to confirm the intent of LCOs for the RHR and RCS pumps.

TSTF-438 proposes to revise the Notes to LCO 3.4.5, 3.4.6, 3.4.7, 3.4.8, 3.9.5 and 3.9.6 so that the Notes are clear exceptions to the LCO requirements and cannot be misinterpreted as a restriction instead of an allowance. These LCOs should permit the removal of the RHR and RCS pumps from operation for testing purposes but not require the pumps' removal from operation for testing.

TSTF-438 remedies the potential confusion that may arise due the present wording of these LCOs. 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 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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NAME	PCHearn	RLDennig	
DATE	10/10/2002	10/21/2002	

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE REVIEW OF TSTF-438, "CLARIFYING EXCEPTION NOTES TO BE
CONSISTENT WITH THE REQUIREMENT BEING EXCEPTED"

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-438, will revise the Notes to LCO 3.4.5, 3.4.6, 3.4.7, 3.4.8, 3.9.5 and 3.9.6 so that the Notes are clear exceptions to the LCO requirements and cannot be misinterpreted as a restriction instead of an allowance.

2.0 BACKGROUND

These LCOs permit the removal of the RHR and RCS pumps from operation for testing purposes but may be interpreted as requiring the removal of these pumps from operation for testing.

3.0 EVALUATION

The proposed change revises the notes to the LCOs for the RHR and RCS pumps to clarify that the notes are not a restriction. The major part of the revision involves changing the words that presently denote that the pumps "may not be in operation" to words that denote that the pumps "may be removed from operation" for testing. This revision does not alter the intent of the existing notes, does not affect any safety analysis assumptions and does not alter any methods of plant operation. The proposed revisions are editorial and do not change the intent of the Technical Specifications or Bases. These changes cover NUREG-1430, NUREG-1431, NUREG-1432, NUREG-1433 and NUREG-1434.

The NRC staff concludes that the proposal to revise the Notes to the RHR and RCS pumps LCOs contained in TSTF-438 are editorial and therefore are acceptable.

Enclosure