

November 7, 2002

Mr. Anthony Pietrangelo
Nuclear Energy Institute
1776 I Street, N.W.
Suite 400
Washington, DC 20006-3708

Dear Mr. Pietrangelo:

The Nuclear Regulatory Commission (NRC) has completed its review of the Nuclear Energy Institute Technical Specification Change Traveler, TSTF-435, "Revise Steam Generator Requirements in ITS 3.4.5, 3.4.6, and 3.4.7" proposed changes to NUREGs-1430, 1431, and 1432, Rev. 2.

TSTF-435 proposes to revise SR 3.4.5.2, SR 3.4.6.2, SR 3.4.7.2, LCO 3.4.7, and Condition 3.4.7.A to require the steam generator(s) to be capable of removing decay heat. The Bases would also be expanded to describe the conditions necessary for the steam generator(s) to be capable of removing decay heat. Currently, the STS requires a specific water level in the secondary side for the steam generators to be considered operable and capable of providing a heat sink for natural circulation. TSTF-435 states that the current ITS is incomplete and misleading. In addition, TSTF-435 states that the proposed wording of the LCO and the referencing of IN 95-35 in the Bases creates a condition in which the IN referenced in the Bases contains additional requirements necessary to meet the intent of the LCO.

The staff has evaluated TSTF-435 and has concluded that the proposed change is not needed. As stated in WOG STS Bases SR 3.4.5.2, "steam generator operability is verified by ensuring that the secondary side narrow range water level is \geq [17]% for required RCS loops. If the steam generator secondary side narrow range water level is $<$ [17]%, the tubes may become uncovered and the associated loop may not be capable of providing the heat sink for removal of the decay heat." Thus the surveillance requirements clearly state a necessary condition for operability. The plant-specific values are accommodated. This decision has been discussed with the TSTF.

It should be noted that NRC Information Notices do not contain requirements. IN 95-35 provides "factors" worthy of consideration when relying on the ability of the steam generators to remove decay heat by natural circulation. Licensees who wish to include the recommendations of IN 95-35 in their applicable Bases can make the changes in accordance with 10 CFR 50.59.

Mr. Anthony Pietrangelo

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Please contact me at (301) 415-1161 or e-mail wdb@nrc.gov if you have any questions or need further information on these proposed changes.

Sincerely,

/RA/

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

cc: T. Silko, BWROG
D. Bice, CEOG
P. Infanger, BWOG
S. Wideman, WOG
D. Hoffman, EXCEL
B. Mann, EXCEL

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