

March 3, 2003

Mr. Tony Pietrangelo  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

SUBJECT: TSTF-439, REVISION 1, "ELIMINATING SECOND COMPLETION TIMES  
LIMITING TIME FROM DISCOVERY OF FAILURE TO MEET AN LCO"

- References: (1) Letter from W.D. Beckner, NRC to T. Pietrangelo, NEI dated November 15, 2001, re: "Risk Informed Extensions of Technical Specification Completion Times"
- (2) Letter from W.D. Beckner, NRC to T. Pietrangelo, NEI dated September 10, 2002, re: Disposition of TSTF-430 "Modified Time Zero" Completion Time Extensions

Dear Mr. Pietrangelo:

This letter forwards the staff requests for additional information needed to support review of the subject traveler. Specifically, the staff requires more information to support the TSTF-439 position that the second completion time limits (the maximum time allowed during any single contiguous occurrence of failing to meet the limiting conditions for operation) can be deleted because these limits are adequately accounted for within the scope of the Maintenance Rule (10 CFR 50.65(a)(4)) system unavailability monitoring requirements.

In reference (1) above, the staff acknowledged support for industry efforts to improve standard technical specifications (STS) using risk analysis. However, the staff has also taken a position to disallow proposals to add risk informed completion times to completion time limits currently in the STS that were based on engineering judgement. In regard to further efforts to improve STS using risk analysis, the staff stated that industry efforts need to encompass the entire outage time contemplated, including the upper limit provided by second completion time limits. While we agree in principle that 10 CFR 50.65(a)(4) offers advantages for managing the risks of changing configurations, we feel that the removal of specific fixed times for certain scenarios requires more detailed supporting analyses. Specifically, we need to understand better how the 10 CFR 50.65(a)(4) program would manage example scenarios where these limits come into play and how the results would compare with the limits now in specifications. This is essentially an exercise in "bench-marking" the 10 CFR 50.65(a)(4) process against existing STS.

Mr. Tony Pietrangelo

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Therefore, the staff requests additional information to show that unavailability monitoring programs required by 10 CFR 50.65(a)(4) will result in appropriate operational limits and appropriately manage cumulative risks during second completion time limits.

Sincerely,

*/RA/*

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

Enclosure: RAI TSTF-439 Rev. 1

Therefore, the staff requests additional information to show that unavailability monitoring programs required by 10 CFR 50.65(a)(4) will result in appropriate operational limits and appropriately manage cumulative risks during second completion time limits.

Sincerely,

*/RA/*

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

Enclosure: RAI TSTF-439 Rev. 1

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REQUEST FOR ADDITIONAL INFORMATION  
TSTF-439 REV. 1

TSTF-439 proposes to make changes to standard technical specifications (NUREGs 1430 through 1434) associated with all Nuclear Steam Supply System Vendor design LCO that contain second completion time limits, those completion times that reference the maximum time allowed during any single contiguous occurrence of failing to meet the LCO. For all STS NUREGs the affected specifications include LCO 3.8.1, AC Sources - Operating, and LCO 3.8.9, Distribution Systems - Operating. For BWO, CEOG and WOG STS the affected specifications also include LCO 3.6.6, Containment Spray and Cooling Systems, and LCO 3.7.5, Auxiliary [Emergency] Feedwater System. For BWR/4 and BWR/6 STS the affected specifications also include LCO 3.1.7, Standby Liquid Control System.

The existing guidance for 10 CFR 50.65(a)(4) is not specific enough to ensure that all licensee programs for structure, system and component unavailability monitoring (Maintenance Rule) will assess and manage cumulative risk concerns regarding second completion time limits. This is because not enough overlap between the maintenance rule, TS, and the configuration risk management program exists to presume these operational limits would be managed by the associated system unavailability monitoring programs required by 10 CFR 50.65(a)(4).

Since TSTF-439 proposes to delete second completion time limits in their entirety, replacing them with unavailability monitoring programs required by 10 CFR 50.65(a)(4), the staff requests additional information to show that unavailability monitoring programs required by 10 CFR 50.65(a)(4) will result in appropriate operational limits and appropriately manage cumulative risks during second completion time limits. Provide a qualitative analysis which explains how the 10 CFR 50.65(a)(4) monitoring program will manage the same kind of limits that exist in standard technical specifications that are proposed for elimination. Discuss the quantitative approaches envisioned as required to support the risk analysis in the 10 CFR 50.65(a)(4) program.

Enclosure