

From: Joelle Starefos
To: Corletti, Mike
Date: 04/02/2003 5:21PM
Subject: RAI Comments 100.003

Mike,

Attached are comments on RAI 100.003. Please let us know if a call is necessary.

Thanks, Joelle
301-415-8488

Joelle L. Starefos
Project Manager
NRC/NRR/NRLPO
Mail Stop: OWFN 4D9A
(301) 415-8488
jls1@nrc.gov

CC: Colaccino, Joseph; Harbuck, C. Craig; Segala, John

RAI 100.003

Need list of technical specification task force (TSTF) items that were incorporated upon adopting technical aspects of NUREG-1431, Rev. 2

Technical Specification (TS) 3.3.5 Required Action C.1 references wrong surveillance requirement (SR) - according to proposed Bases, it should be SR 3.3.2.2

TS 3.3.5 Required Actions B.1 and C.1 Completion Times of "Once per 31 days on a STAGGERED TEST BASIS" should be discussed and justified in the associated Bases. Also, these actions should specify a Completion Time for the initial performance of the test, followed by the periodic testing thereafter (see TS 1.3 Example 1.3-7). Otherwise, please explain how the proposed testing schedule would work and provide an example; TS 1.4 does not appear to explain such a Frequency.

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