UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

December 29, 1993

TO: ALL HOLDERS OF OPERATING LICENSES FOR NUCLEAR POWER REACTORS

SUBJECT: RELOCATION OF TECHNICAL SPECIFICATION TABLES OF INSTRUMENT RESPONSE TIME LIMITS (Generic Letter 93-08)

The U.S. Nuclear Regulatory Commission (NRC) is issuing this guidance for requesting a license amendment to relocate tables of instrument response time limits from technical specifications (TS) to the updated final safety analysis report. The NRC developed this line-item TS improvement in response to TS proposals by applicants for operating licenses.

Licensees that plan to adopt this line-item TS improvement are encouraged to propose TS changes consistent with the guidance given in Enclosures 1 and 2. NRC project managers will review the amendment requests to verify that they conform to this guidance. Please contact your project manager or the contact indicated herein if you have any questions on this matter.

Licensee action to propose TS changes under the guidance of this generic letter is voluntary. Therefore, such action is not a backfit under the provisions of Section 50.109 of Title 10 of the Code of Federal Regulations (10 CFR). The following information, although not requested under the provisions of 10 CFR 50.54(f), would help the NRC evaluate costs and benefits for licensees who propose the TS changes described in this generic letter:

- licensee time and costs to prepare the amendment request
- estimate of the long-term costs or savings accruing from this TS change

The voluntary information collections contained in this request are covered by the Office of Management and Budget clearance number 3150-0011, which expires June 30, 1994. The public reporting burden for this voluntary collection of information is estimated to average 40 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this voluntary collection of information, including suggestions for reducing this burden, to the Information and Records Management Branch (MNBB-7714), U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and

002085

D&R-5 (Information/Generic Letter)
X L-4-1, Part 50 (Technical Specifications)

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to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-3019, (3150-0011), Office of Management and Budget, Washington, D.C. 20503.

Sincerely,

L. J. Callan
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
1. Guidance for A Proposed License Amendment to Relocate Tables of Instrument Response Time Limits from Technical Specifications to the Updated Final Safety Analysis Report
2. Model Technical Specifications
3. List of Recently Issued NRC Generic Letters

Technical contact: T. G. Dunning, NRR
(301) 504-1189

Guidance for a Proposed License Amendment To Relocate Tables of Instrument Response Time Limits From Technical Specifications to the Updated Final Safety Analysis Report

Introduction

The NRC is issuing the following guidance for preparing a proposed license amendment to relocate the tables of response time limits for the reactor trip system (RTS) and the engineered safety features actuation system (ESFAS) instruments from technical specifications (TS) to the updated final safety analysis report (FSAR). The NRC has already implemented this line-item TS improvement for recently issued operating licenses and in the improved standard technical specifications.

Discussion

The limiting conditions for operation (LCOs) for RTS and ESFAS instruments require that these systems be operable with response times as specified in TS tables for each of these systems. The surveillance requirements specify that licensees test these systems and verify that the response time of each function is within its limits. Relocating the tables of the RTS and ESFAS instrument response time limits from the TS to the updated FSAR will not alter these surveillance requirements. The updated FSAR will now address the response time limits for the RTS and ESFAS instruments, including those channels for which the response time limit is indicated as "NA"; that is, a response time limit is not applicable. The updated FSAR will also clarify response time limits where footnotes are included in the tables that describe how those limits are applied. This TS change also allows the licensee to administratively control changes to the response time limits for the RTS and ESFAS instruments in accordance with the provisions of 10 CFR 50.59 without the need to process a license amendment request.

The LCOs for the RTS and the ESFAS typically specify that the associated instruments "shall be OPERABLE with RESPONSE TIMES as shown in Table 3.3-2" (RTS) or "Table 3.3-5" (ESFAS). An acceptable change to the LCOs would be to remove the reference to response times and simply state that this instrumentation "shall be OPERABLE" as shown for the markup of the Westinghouse standard technical specifications in Enclosure 2. This change is applicable to all plants and is compatible with relocating the referenced tables.

The surveillance requirements specify that the response time of each trip function is to be demonstrated to be within its limit at the specified frequency and do not reference the tables of response time limits. Therefore, the surveillance requirements specified in this manner need not be modified to implement this change. However, a footnote in the table of response time limits for the RTS states that neutron detectors are exempt from response time testing. To retain this exception, which is stated in the table being removed from the TS, the surveillance requirements for the RTS should be modified to add the following statement:

> Neutron detectors are exempt from response time testing.

Each licensee that wishes to implement this line-item TS improvement should confirm that the plant procedures for response time testing include acceptance criteria that reflect the RTS and ESFAS response time limits in the tables being relocated from the TS to the updated FSAR. The licensee should also provide a commitment to include the RTS and ESFAS response time limits in the next update of the FSAR.

Licensees would submit any subsequent changes to these limits in the FSAR as an update of the FSAR as required by 10 CFR 50.71(e). Related changes to plant procedures would be subject to the provisions that control changes to plant procedures as stated in the administrative controls section of the TS.

Model Technical Specifications

The model technical specifications are based on the "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," NUREG-0452, Revision 4a; however, the indicated changes are applicable for all plants.

3/4.3.1 REACTOR TRIP SYSTEM INSTRUMENTATION

3.3.1 As a minimum, the Reactor Trip System instrumentation channels and interlocks of Table 3.3-1 shall be OPERABLE. ~~with RESPONSE TIMES as shown in Table 3.3-2.~~

(Change TS 3.3.1 as shown)

4.3.1.2 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. Neutron detectors are exempt from response time testing. Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific Reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

(Make addition to TS 4.3.1.2 as shown in Bold typeface)

3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4. ~~and with RESPONSE TIMES as shown in Table 3.3-5.~~

(Change to TS 3.3.2 as shown)

4.3.2.2 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" column of Table 3.3-3.

(Make no change to TS 4.3.2.2)

LIST OF RECENTLY ISSUED GENERIC LETTERS

Generic Letter	Subject	Date of Issuance	Issued To
93-07	MODIFICATION OF THE TECHNICAL SPECIFICATION ADMINISTRATIVE CONTROL REQUIREMENTS FOR EMERGENCY AND SECURITY PLANS	12/28/93	ALL HOLDERS OF OLs FOR NPRs
93-06	RESEARCH RESULTS ON ON GENERIC SAFETY ISSUE 106, "PIPING AND THE USE OF HIGHLY COMBUSTIBLE GASES IN VITAL AREAS"	10/25/93	ALL HOLDERS OF OLs OR CPs FOR NPRs
93-05	LINE-ITEM TECHNICAL SPECIFICATIONS IMPROVEMENTS TO REDUCE SURVEILLANCE REQUIREMENTS FOR TESTING DURING POWER OPERATION	09/27/93	ALL HOLDERS OF OLs OR CPs FOR NPRs
89-10, SUPP. 5	INACCURACY OF MOTOR-OPERATED VALVE DIAGNOSTIC EQUIPMENT	06/28/93	ALL LICENSEES OF OPERATING NUCLEAR POWER PLANTS AND HOLDERS OF CONSTRUCTION PERMITS FOR NUCLEAR POWER PLANTS
93-04	ROD CONTROL SYSTEM FAILURE AND WITHDRAWAL OF ROD CONTROL CLUSTER ASSEMBLIES, 10 CFR 50.54(f)	06/21/93	ALL HOLDERS OF OLs OR CPs FOR (W)-DESIGNED NPRs EXCEPT HADDAM NECK ALL HOLDERS OF OLs OR CPs FOR (CE)-DESIGNED AND (B&W)-DESIGN NPRs AND HADDAM NECK
93-03	VERIFICATION OF PLANT RECORDS	10/20/93	ALL HOLDERS OF OLs OR CPs FOR NPRs
93-02	NRC PUBLIC WORKSHOP ON COMMERCIAL GRADE PROCUREMENT AND DEDICATION	03/23/93	ALL HOLDERS OF OLs OR CPs FOR NPRs AND ALL RECIPIENTS OF NUREG-0040, "LICENSEE CONTRACTOR AND VENDOR INSPECTION STATUS REPORT" (WHITE BOOK)

OL = OPERATING LICENSE
CP = CONSTRUCTION PERMIT
NPR = NUCLEAR POWER REACTORS

to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-3019, (3150-0011), Office of Management and Budget, Washington, D.C. 20503.

Sincerely,
orig /s/'d by LKCallan
L. J. Callan
Acting Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
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(301) 504-1189

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As confirmed by D. Allison, CRGR staff on 12/06/93, further CRGR review was not considered necessary because no substantive changes were made to the generic letter as reveiwed by CRGR in response to public comments.

*SEE PREVIOUS CONCURRENCE

OTSB:DORS	Tech Editor	OTSB:DORS	C:OTSB:DORS	C:OGCB:DORS
TGDunning;tgd*	MMejac*	FMReinhart*	CIGrimes*	GHMarcus*
07/29/93	07/29/93	08/02/93	09/07/93	09/08/93

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WAReckley*	SATreby*	BKGrimes	LJCallan*
09/09/93	09/14/93	12/28/93	12/22/93

DOC NAME: 93-08.IN