

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR REACTOR REGULATION  
WASHINGTON, D.C. 20555-0001

October 9, 1996

**NRC ADMINISTRATIVE LETTER 96-04: EFFICIENT ADOPTION OF IMPROVED  
STANDARD TECHNICAL SPECIFICATIONS**

Addressees

All holders of operating licenses for nuclear power reactors who have not converted to the improved standard technical specifications (STS).

Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this administrative letter to inform addressees of (1) efficient means to adopt the improved STS and (2) staff practices for the review of applications for license amendments to convert to the improved STS. This administrative letter does not transmit or imply any new or changed requirements or staff positions. No specific action or written response is required.

Background

In 1992, the NRC issued the improved STS to more clearly define the content and form of requirements necessary to ensure safe operation of nuclear power plants in accordance with Title 10, Code of Federal Regulations (10 CFR) Section 50.36. In its Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, issued on July 22, 1993 (58 FR 39132), the Commission placed the highest priority on license amendment applications to convert the technical specifications to the improved STS. For the reasons described in the policy statement, the NRC continues to believe that total adoption of the improved STS will substantially improve the efficiency of the regulatory process, and ensure that licensee and NRC resources are applied to significant safety matters.

Discussion

The major objective of converting from plant-specific technical specifications to the improved STS is to achieve as much consistency in the license requirements as possible, to the extent that the plant-specific design basis can conform with the related typical plant design reflected in the improved STS. To ensure efficient and timely staff review of conversions to the improved STS, the associated license amendment applications must clearly identify in the forwarding letter those changes to the technical specifications that are not directly related to the conversion amendment. These "beyond scope" issues, which are generally characterized as changes that differ from both the existing technical specifications and the improved STS, tend to unnecessarily complicate and delay the conversion review process.

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Although it may be more efficient to incorporate pending or planned changes to the design basis in the conversion application, subsequent delays in the technical review for those parts can interfere with the timely and efficient review of the conversion. Consequently, applications for conversion to the improved STS should include proposed technical specifications with and without the changes to the design basis so that "beyond scope" changes may be separated if the completion of the review for those changes would affect timely completion of the conversion amendment.

In a related matter, the conversion reviews have occasionally been hampered by questions concerning the applicability of appropriate controls for requirements moved from the technical specifications to licensee-controlled documents. Although parts of the existing technical specifications can be moved to the Quality Assurance Program, or to similar licensee-controlled documents for which there is an applicable regulatory process for future changes, most of the relocated requirements are placed in the final safety analysis report (FSAR) so that future changes can be made in accordance with 10 CFR 50.59. Some licensees have attempted to incorporate those requirements into plant procedures, rather than into the FSAR, by committing to apply §50.59 to future changes. The staff believes that for consistency and clarity, licensees should incorporate the details of the relocated technical specification requirements for which §50.59 is needed to control future changes, directly in the FSAR or in the Bases for the improved standard technical specifications.

An acceptable approach that several licensees have used is to incorporate the details of the relocated technical specification requirements into a manual, and then reference the manual in the FSAR. On the basis of industry experience, the Nuclear Energy Institute (NEI) recently issued NEI 96-06, "Improved Technical Specifications Conversion Guidance." This guide was prepared by the NEI Technical Specifications Task Force; it contains useful information that may improve the efficiency of the license amendment process for improved STS conversions and describes the role of the task force in managing generic changes to the improved STS.

These practices will ensure efficient and timely completion of applications to convert to the improved STS, and more effective use of NRC and licensee resources.

This administrative letter requires no specific action or written response. If you have any questions about this letter, please contact the person listed below or your appropriate NRR project manager.



Thomas T. Martin, Director  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

Contact: C. I. Grimes, NRR  
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LIST OF RECENTLY ISSUED  
NRC ADMINISTRATIVE LETTERS

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Administrative Letter No.	Subject	Date of Issuance	Issued to
96-03	Centralization of Quality Assurance Program Review Responsibility in the Office of Nuclear Reactor Regulation	09/27/96	All holders of OLs or CPs for nuclear power reactors
95-03, Rev. 1	Availability of Reactor Vessel Integrity Database	07/10/96	All holders of OLs or CPs for nuclear power reactors
96-02	Licensee Responsibilities Related to Financial Qualifications	06/21/96	All holders of OLs or CPs for nuclear power reactors
94-13, Rev. 2	Access to Nuclear Regulatory Commission Bulletin Board Systems	05/03/96	All NRC licensees.
96-01	Operator Licensing National Examination Schedule	01/09/96	All holders of OLs or CPs for nuclear power reactors.
95-06	Relocation of Technical Specification Administrative Controls Related to Quality Assurance	12/12/95	All holders of OLs or CPs for nuclear power reactors.
95-05	Revisions to Staff Guidance for Implementing NRC Policy on Notices of Enforcement Discretion	11/07/95	All holders of OLs or CPs for nuclear power reactors.
95-04	NRC Program Office responsibilities for Decommissioning Activities and Planning for Dry Cask Storage of Spent Fuel	11/07/95	All holders of OLs & CPs for nuclear power reactors.

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OL = Operating License  
CP = Construction Permit

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*for* original signed by A.E. Chaffee  
 Thomas T. Martin, Director  
 Division of Reactor Program Management  
 Office of Nuclear Reactor Regulation

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*Attachment filed in Jacket*

Tech Editor has reviewed and concurred on 09/06/96

\*SEE PREVIOUS CONCURRENCES

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*ID&R-5 Admin Letter*

This administrative letter requires no specific action or written response. If you have any questions about this letter, please contact the person listed below or your appropriate NRR project manager.

Thomas T. Martin, Director  
Division of Reactor Program Management  
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