



Enclosure 1

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

May 6, 1991

TO: ALL HOLDERS OF OPERATING LICENSES OR CONSTRUCTION PERMITS FOR
NUCLEAR POWER REACTORS

SUBJECT: REMOVAL OF COMPONENT LISTS FROM TECHNICAL SPECIFICATIONS
(GENERIC LETTER 91-08)

This generic letter provides guidance for preparing a request for a license amendment to remove component lists from technical specifications (TS). This guidance provides an acceptable alternative to identifying every component by its plant identification number as it is currently listed in the tables of TS components. The removal of component lists is acceptable because it does not alter existing TS requirements or those components to which they apply. The nuclear industry and the U.S. Nuclear Regulatory Commission (NRC) identified this line-item TS improvement during investigations of TS problems. Previous guidance was provided by Generic Letter 84-13 on removing the list of snubbers from TS.

This guidance includes the incorporation of lists into plant procedures that are subject to the change control provisions for plant procedures in the Administrative Controls Section of the TS. The removal of component lists from TS permits administrative control of changes to these lists without processing a license amendment, as is required to update TS component lists. Any change to component lists contained in plant procedures is subject to the requirements specified in the Administrative Controls Section of the TS on changes to plant procedures. Therefore, the change control provisions of the TS provide an adequate means to control changes to these component lists, when they have been incorporated into plant procedures, without including them in TS.

Licensees and applicants that plan to adopt this line-item TS improvement are encouraged to propose TS changes that are consistent with the guidance provided in Enclosures 1 and 2. Enclosure 1 provides guidance on the TS changes for specific lists of components. Enclosure 2 provides the applicable sections of the current standard technical specification (STS) requirements with the TS changes to allow the removal of component lists. The NRC project manager for the facility will review conforming amendment requests. Proposed amendments that deviate from this guidance will lengthen the time required to complete the review. Please contact the project manager or the contact identified below if you have questions on this matter.

This letter does not require any licensee to implement changes to their plant procedures or propose changes to their plant TS. Action taken in response to

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9105020075

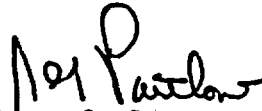
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the guidance provided in this generic letter is voluntary and is not a backfit under 10 CFR 50.109. Therefore, Office of Management and Budget clearance is not required.

However, the NRC staff recommends that licensees who previously requested a change to remove the list of containment isolation valves from their plant TS may wish to review the impact that this change can have on TS requirements as discussed in Enclosure 1. In some cases, previous TS changes may have removed TS provisions that were identified only as part of the list of components that was removed from the TS. If such provisions are not retained in the TS, as noted in Enclosures 1 and 2, they will no longer apply. Likewise, some licensees may have TS that inappropriately reference other documents, such as the updated safety analysis report, for a list of those individual components to which the TS limiting conditions for operation apply. As noted in Enclosure 1, these references do not accomplish the intent of the TS change to remove a list of components from TS. Therefore, licensees that find either of these conditions may wish to submit a license amendment request to restore any TS provision that was inadvertently removed from the TS or to remove an inappropriate reference in the TS that would not accomplish the intent of removing the list from the TS.

Sincerely,



James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures:
As stated

REMOVAL OF COMPONENT LISTS FROM TECHNICAL SPECIFICATIONS (TS)Background

Generic Letter (GL) 84-13 provided guidance on removing the list of snubbers from technical specifications (TS). After GL 84-13 was issued, many licensees submitted proposals on a plant-specific basis to remove other component lists from TS. The nuclear industry has also recommended the removal of component lists from TS as a TS improvement. This guidance for a license amendment request to remove component lists from TS is based on the experience of both the NRC and the industry.

The NRC staff noted that many license amendments had been required in order to add, delete, or modify the list of snubbers. The staff concluded that the list of snubbers was not necessary, provided the TS were modified to specify those snubbers that are required to be operable. Also, the staff noted that any changes in the quantities, types, or locations of snubbers would constitute a change to the facility and thus would be subject to the provisions of Section 50.59 of Title 10 of the Code of Federal Regulations (10 CFR). The snubber TS was modified to state that the only snubbers excluded from the TS requirements were those installed on nonsafety-related systems, and then only if their failure or the failure of the system on which they were installed would have no adverse effect on any safety-related system. The table with the list of snubbers and the associated references were removed from the limiting condition for operation (LCO) and the associated surveillance requirements.

Therefore, specifications may be stated in general terms that describe the types of components to which the requirements apply. This provides an acceptable alternative to identifying components by their plant identification number as they are currently listed in tables of TS components. The removal of component lists is acceptable because it does not alter existing TS requirements or those components to which they apply.

Guidance on the Removal of Component Lists From TS

The approach taken in GL 84-13 to remove a list of components from TS may also be used to remove other component lists from TS. To implement this approach, the TS should be revised to incorporate an explicit description of those components for which the TS requirements apply. A list of those components must be included in a plant procedure that is subject to the change control provisions for plant procedures in the Administrative Controls Section of the TS. This can be accomplished by incorporating in such a procedure the list that identifies all the components for which the TS requirements apply or by confirming that an existing procedure includes this list of components. If a specification is revised such that the scope of those components to which it applies is increased, the additional components shall be added to the TS list when it is incorporated in a plant procedure. Likewise, any list of TS components in existing procedures shall also be updated. When component lists are included in plant procedures, the identification of the individual components to which the TS requirements apply will be a simple task.

Although some components may be listed in the updated final safety analysis report (FSAR), the FSAR should not be the sole means to identify these

components. Licensees are only required to update the FSAR annually, and they are only required to reflect changes made 6 months before the date of filing. Thus, the FSAR may be out of date by as much as 18 months. However, to highlight the change controls of 10 CFR 50.59 or to clarify other issues related to these components, licensees may wish to include these component lists in the next update of the FSAR. The Bases Section of the TS may reference the plant procedures where these lists are located; however, component lists should not be included in the Bases Section because the Bases Section lacks an appropriate regulatory process for change control. Finally, it would be inappropriate for a limiting condition for operation of the TS to reference the FSAR or any other document to specify those individual components to which the TS requirements apply. If such references were used, a change in those references could constitute a change to a TS requirement and such changes should only be made via the license amendment process. This would negate the intent of removing the list from the TS which is to allow subsequent changes to the list without having to process a license amendment.

The staff provides the following guidance for changing individual TS sections. This guidance addresses considerations that are unique to specific types of component lists.

1. Containment Isolation Valves

The specification for containment isolation valves applies to those valves that are listed in the table referenced in the TS. The alternative to listing these valves in a TS table is the revision of the LCO to state "Each containment isolation valve shall be OPERABLE." The reference to valves "specified in Table 3.6-2" should also be deleted from the action statement. Similarly, the surveillance requirements for (1) post-maintenance testing, (2) demonstrating automatic closure on isolation signals, and (3) confirming the isolation time of power-operated or automatic valves, should be revised to remove the reference to the TS table and revised to state "Each containment isolation valve shall . . ." or ". . . each power-operated or automatic containment isolation valve shall . . ."

The list of containment isolation valves in the TS may not include all valves that are classified as containment isolation valves by the plant licensing basis. Generally, the FSAR identifies those valves that are classified as containment isolation valves. With this TS change, the LCO, remedial actions, and surveillance requirements will apply for all valves that are classified as containment isolation valves by the plant licensing basis.

The list of containment isolation valves typically includes footnotes that modify the TS requirements for these valves. Such notes must be incorporated into the associated LCO so that they will remain in effect when the table containing these footnotes is removed from the TS. One of these footnotes involves valves that are exempt from the requirements of TS 3.0.4. TS 3.0.4 precludes entry into an operational mode or condition when an LCO would not be met without reliance on the provisions of the action requirements. The action requirements for containment isolation valves permit continued operation with an inoperable valve when the associated penetration is isolated. Therefore, an exception to the limitation of TS 3.0.4 on changes in operational modes or conditions is acceptable for this specification, and a statement may be added

to the LCO under the action requirements to state "The provisions of Specification 3.0.4 do not apply." This exception will apply to all containment isolation valves. The increase in the scope of this exception is acceptable because it is consistent with the guidance provided in Generic Letter 87-09. However, this statement is not necessary if TS 3.0.4 has been revised as allowed by Generic Letter 87-09.

The list of containment isolation valves may also include a footnote that addresses an operational consideration for specific valves that may be opened on an intermittent basis under administrative control. This provision applies to valves that are locked or sealed closed consistent with the design requirements of General Design Criteria (GDC) 55, 56, and 57 of Appendix A to 10 CFR Part 50. The design of these valves includes positive control features to ensure that they are maintained closed. Therefore, in the absence of this provision, the opening of these locked or sealed closed valves would be contrary to the operability requirements for these valves that are currently listed in the TS table of containment isolation valves. With the removal of the TS list of valves, the operability requirements will apply to all containment isolation valves that have the locked or sealed closed feature as required by these GDC.

The staff concludes that an acceptable alternative to identifying specific valves that may be opened under administrative control would be the addition of a footnote to the LCO to state "Locked or sealed closed valves may be opened on an intermittent basis under administrative control." With this change, the definition of Containment Integrity and the surveillance requirements for demonstrating containment integrity in Specification 4.6.1.1 should be revised to remove the reference to the table of containment isolation valves. These sections of the TS should be revised to state ". . . , except for valves that are open under administrative control as permitted by Specification 3.6.4."

The footnote on opening valves under administrative control also may have been used in some plant TS for remote-manual valves associated with closed systems. A remote-manual valve is an acceptable alternative to a locked or sealed closed valve for closed systems as stated in GDC 57 in Appendix A to 10 CFR Part 50. Therefore, this footnote need not remain in the TS to allow operators to open any remote-manual containment isolation valve associated with closed systems because such action is not contrary to the operability requirements for these valves.

However, the NRC staff wishes to restate its position on considerations that constitute an acceptable administrative control for opening locked or sealed closed containment isolation valves. Furthermore, these considerations should be stated in the Bases Section for this specification as the following and an updated copy of this section should be provided with the license amendment request.

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that

environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

Some plant TS may not have included provisions for opening locked or sealed closed valves on an intermittent basis under administrative control. In this case, these containment isolation valves probably were not listed in the table being removed from the TS. However as noted above, the removal of the list of valves from the TS results in the LCO operability requirements being applicable to all containment isolation valves. This extends the operability requirements to those valves that utilize locked or sealed closed features to comply with the requirements of the GDC. Therefore, if any of these valves are opened during the operational modes for which the LCO applies, the license amendment request should include the above footnote allowing these valves to be opened on an intermittent basis under administrative control as a proposed TS change. Also, the Bases Section should be updated to include the clarification of what constitutes appropriate administrative control for opening these valves.

Another clarifying note used in the list of containment isolation valves identifies those valves that are not subject to Type C leak testing requirements of Appendix J to 10 CFR Part 50. In this case, this notation does not alter the requirements of Appendix J but rather only clarifies where the NRC has granted exemptions to Type C leak testing or where Appendix J does not require this testing. Therefore, the TS need not address this clarification, but it may be included with a list of these valves in the FSAR if it is desired to clarify the applicability of Appendix J requirements. However, placing the current TS list of containment isolation valves in the FSAR would not restrict the applicability of the TS requirements to only the valves on that list. As previously noted, the TS requirements would apply to all valves that have been defined as containment isolation valves in the plant licensing basis.

Finally, some TS have included valve closure times in the list of containment isolation valves. The inservice testing (IST) requirements referenced by Specification 4.0.5 include the verification of valve stroke times for a broader class of valves than those containment isolation valves that have been listed in the TS. The removal of valve closure times that are included in some plant TS would not alter the TS requirements to verify that valve stroke times are within their limits. Therefore, removal of these closure times is acceptable.

Because plant-specific considerations may have required that these tables include other notes modifying the TS requirements for specific valves, any such exceptions should be stated in terms that identify the valves by function rather than by component number, if practical. This guidance also applies to any other component list removed from TS that includes notes that alter the TS requirements. If notes in these tables are only included for information and do not alter any TS requirement, the removal of these notes with the list of components would not affect the applicability of the TS requirements.

2. Reactor Coolant System Pressure Isolation Valves

Guidance on removing from the TS the list of reactor coolant system pressure isolation valves is pending the NRC staff's resolution of generic concerns with

existing lists for these valves. In the interim, licensees should not submit proposals to remove this list from the TS.

3. Secondary Containment Bypass Leakage Paths

The TS on containment leakage includes a list of secondary containment bypass leakage paths. The list identifies these leakage paths by penetration number for dual containment plants. The combined leakage rate for all penetrations identified as secondary containment bypass leakage paths is specified.

As part of the plant licensing basis, the FSAR defines the penetrations that are secondary containment bypass leakage paths. This definition of "secondary containment bypass leakage paths" is adequate such that the TS requirements do not require further clarification upon the removal of this list from the TS. Therefore, the TS requirements may be stated in terms of secondary containment bypass leakage paths without further clarification. For example, the limitation of TS 3.6.1.2.c on containment leakage rates should be revised to state the following:

A combined leakage rate of less than or equal to $[0.10] L_a$ for all penetrations that are secondary containment bypass leakage paths when pressurized to P_a .

4. Containment Penetration Conductor Overcurrent Protective Devices

The list of containment penetration conductor overcurrent protective devices includes those primary and backup fuses and breakers that preclude faults of a magnitude and duration that could compromise the integrity of electrical penetrations. Because the number of overcurrent protective devices associated with electrical circuits penetrating containment may exceed the basic requirements for primary and backup protection, the description of these components should be stated to clarify those components to which the TS requirements apply. Also, these requirements exclude circuits for which credible fault currents would not exceed the electrical penetration design rating. For example, these requirements exclude thermocouple and other low-power-level signal circuits. An alternative to listing these components in a TS table is the following LCO statement:

Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which credible fault currents would not exceed the electrical penetration design rating.

In addition, the surveillance requirements should state "The above noted primary and backup containment penetration conductor overcurrent protective devices . . ." rather than referring to those components listed in Table 8.3-1.

5. Motor-Operated Valves Thermal Overload Protection

The TS contain a list of valves that have thermal overload protection and bypass devices integral with the motor starter. The table in the TS lists the valves by number, the bypass device, and the system affected. With the removal of this list of valves from the TS, the LCO should state "The thermal overload protection and bypassed devices, integral with the motor starter, of each valve used in safety systems shall be OPERABLE." This statement for the LCO adequately defines the scope of the valves that include these features to which the TS requirements apply.

6. Other Component Lists

Component lists other than those previously described herein may be candidates for removal from TS on a plant-specific basis. A proposal to remove any other TS component list should be based on this guidance and any considerations that may be unique to a particular list.

Summary

A request to remove component lists from TS should address the following issues:

1. Each TS should include an appropriate description of the scope of the components to which the TS requirements apply. Components that are defined by regulatory requirements or guidance need not be clarified further. However, the Bases Section of the TS should reference the applicable requirements or guidance.
2. If the removal of a component list results in the loss of notes that modify or provide an exception to the TS requirements, the specification should be revised to incorporate that modification or exception. The modification or exception should be stated in terms that identify any group of components by function rather than by plant identification number, if practical.
3. Licensees should confirm that the lists of components removed from the TS are located in appropriately controlled plant procedures. The list of components may be included in the next update of the FSAR. The Bases Section of individual specifications also may reference the plant procedures or other documents that identify each component list. The Bases Section for the containment isolation valve TS should be updated to describe the intent of opening valves under administrative control.

This guidance is not to be used to remove from TS any table that addresses information or requirements other than a list of components to which a specification applies. Enclosure 2 provides the applicable sections of the current STS requirements and the associated TS changes that are necessary to allow the removal of the components lists.

EXISTING STS REQUIREMENTS AND CHANGES TO ALLOW
THE REMOVAL OF COMPONENT LISTS

3/4.6.4 CONTAINMENT ISOLATION VALVES (Existing)

3.6.4 The containment isolation valves specified in Table 3.6-2 shall be OPERABLE with isolation times as shown in Table 3.6-2.

ACTION:

With one or more of the isolation valve(s) specified in Table 3.6-2 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

a.

ALTERNATIVE: (Changes high-lighted by underline or shown with () for deletions.)

3.6.4 Each containment isolation valve shall be OPERABLE.*

ACTION:

With one or more of the isolation valves(s) () inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

a.

(New statement under ACTION requirements.)

The provisions of Specification 3.0.4 do not apply.

(New footnote for TS 3.6.4.)

*Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

SURVEILLANCE REQUIREMENTS (Existing)

4.6.4.1 The isolation valves specified in Table 3.6-2 shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit by performance of a cycling test and verification of isolation time.

4.6.4.2 Each isolation valve specified in Table 3.6-2 shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

a.

4.6.4.3 The isolation time of each power-operated or automatic valve of Table 3.6-2 shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

ALTERNATIVE:

4.6.4.1 Each containment isolation valve () shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair, or replacement work is performed on the valve or its associated actuator, control, or power circuit by performance of a cycling test and verification of isolation time.

4.6.4.2 Each containment isolation valve () shall be demonstrated OPERABLE during the COLD SHUTDOWN or REFUELING MODE at least once per 18 months by:

a.

4.6.4.3 The isolation time of each power-operated or automatic containment isolation valve () shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

DEFINITIONSCONTAINMENT INTEGRITY (Existing)

1.7 CONTAINMENT INTEGRITY shall exist when:

- a. All penetrations required to be closed during accident conditions are either:
 - 1) Capable of being closed by an OPERABLE containment automatic isolation valve system, or
 - 2) Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except as provided in Table 3.6-2 of Specification 3.6.4.
- b.

ALTERNATIVE

1.7 CONTAINMENT INTEGRITY shall exist when:

- a. All penetrations required to be closed during accident conditions are either:
 - 1) Capable of being closed by an OPERABLE containment automatic isolation valve system, or
 - 2) Closed by manual valves, blind flanges, or deactivated automatic valves secured in their closed positions, except for valves that are open under administrative control as permitted by Specification 3.6.4.
- b.

3/4.6.1 PRIMARY CONTAINMENT (Existing)**4.6.1.1 Primary Containment Integrity shall be demonstrated:**

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except as provided in Table 3.6-2 of Specification 3.6.4.
- b.

ALTERNATIVE:**4.6.1.1 Primary Containment Integrity shall be demonstrated:**

- a. At least once per 31 days by verifying that all penetrations* not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions, except for valves that are open under administrative control as permitted by Specification 3.6.4.
- b.

CONTAINMENT LEAKAGE (Existing)**3.6.1.2 Containment leakage rates shall be limited to:**

- a.
- b.
- c. A combined leakage rate of less than or equal to $[0.10] L_a$ for all penetrations identified in Table 3.6-1 as secondary containment bypass leakage paths when pressurized to P_a .

ALTERNATIVE:**3.6.1.2 Containment leakage rates shall be limited to:**

- a.
- b.
- c. A combined leakage rate of less than or equal to $[0.10] L_a$ for all penetrations that are secondary containment bypass leakage paths when prsssurized to P_a .

ELECTRICAL EQUIPMENT PROTECTIVE DEVICES (Existing)

3.8.4.2 All containment penetration conductor overcurrent protective devices given in Table 3.8-1 shall be OPERABLE.

ACTION:

With one or more of the containment penetration conductor overcurrent protective device(s) given in Table 3.8-1 inoperable:

a.

ALTERNATIVE:

3.8.4.2 Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which credible fault currents would not exceed the electrical penetration design rating.

ACTION:

With one or more of the containment penetration conductor overcurrent protective device(s) () inoperable:

a.

SURVEILLANCE REQUIREMENTS (Existing)

4.8.4.2 All containment penetration conductor overcurrent protective devices given in Table 3.8-1 shall be demonstrated OPERABLE:

a.

ALTERNATIVE

4.8.4.2 All containment penetration conductor overcurrent protective devices () shall be demonstrated OPERABLE:

a.

MOTOR-OPERATED VALVES THERMAL OVERLOAD PROTECTION AND BYPASS DEVICES (Existing)

3.8.4.3 The thermal overload protection and bypass devices, integral with the motor starter, of each valve listed in Table 3.8-2 shall be OPERABLE.

ALTERNATIVE:

3.8.4.3 The thermal overload protection and bypass devices, integral with the motor starter, of each valve used in safety systems shall be OPERABLE.

With the above changes, the associated tables are to be removed from the TS. This should be done by removing the table title, name, and its contents. The associated pages of the TS should be noted as "Not used" and can be accomplished using a single page that notes those pages that are no longer used. It would not be appropriate to retain the table name and number with a reference to a document that contains a list of components to which the associated TS applies. If such references are desired, they can be incorporated into the Bases Section of the associated TS. As a house-keeping measure, the TS index should be likewise updated to remove all references to tables of component lists that have been removed from the TS.

MODEL SAFETY EVALUATION REPORT

Underscored blank spaces are to be filled in with the applicable information. The information identified in brackets should be used as applicable on a plant-specific basis. (Note to PMs: A copy of this document may be obtained from P. Coates, X-21161, by requesting 5520 document LIST SER.)

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. TO FACILITY OPERATING LICENSE NO.

[UTILITY NAME]

[PLANT NAME]

DOCKET NO. 50-

1.0 INTRODUCTION

By letter dated , 1991, [utility name] (the licensee) requested an amendment to Facility Operating License No. for [plant name]. The proposed amendment would remove the technical specification (TS) tables that include lists of components referenced in individual specifications. In addition, the TS requirements have been modified such that all references to these tables have been removed. Finally, the TS have been modified to state requirements in general terms that include the components listed in the tables removed from the TS. Guidance on the proposed TS changes was provided by Generic Letter 91- , dated March , 1991.

2.0 EVALUATION

The licensee has proposed the removal of Table 3.6-1, "Secondary Containment Bypass Leakage Paths," that is referenced in TS 3.6.1.2. With the removal of this table, the licensee has proposed to modify the limiting condition for operation (LCO) on containment leakage rates to state the limit specified by TS 3.6.1.2.c as the following:

A combined leakage rate of less than or equal to $[0.10] L_a$ for all penetrations that are secondary containment bypass leakage paths when pressurized to P_a .

The licensee has proposed the removal of Table 3.6-[2], "Containment Isolation Valves," that is referenced in TS 3/4.6.4. With the removal of this table, the licensee has proposed to include the following statement of the LCO under TS 3.6.4:

Each containment isolation valve shall be OPERABLE.

In addition, the licensee has revised [the definition of Containment Integrity, TS 4.6.1.1,] the action requirements under TS 3.6.4, and TS 4.6.4.1 through 4.6.4.3 to remove all references to Table 6.3-[2]. [The definition of Containment Integrity and TS 4.6.1.1 refer to TS 3.6.4 for an exception that is now covered by a footnote to the LCO rather than by the table removed from the TS.

With the removal of the reference to Table 6.3-[2], the licensee has proposed to state this exception as:

. . . , except for valves that are open under administrative control as permitted by Specification 3.6.4.]

The surveillance requirements of TS 4.6.4.1 through 4.6.4.3 have been revised to state "Each containment isolation shall . . ." or ". . . each power-operated or automatic containment isolation valve shall . . ." rather than stating the requirements in relation to the valves specified in Table 3.6-[2]. [Because Table 3.6-[2] notes that the provisions of Specification 3.0.4 are not applicable to specific valves, the following statement has been added to the LCO for TS 3.6.4:

The provisions of Specification 3.0.4 do not apply.

This is a change in the application of this exception, from specific valves to all containment isolation valves, and is acceptable because it is consistent with the guidance provided in Generic Letter 87-09 and as noted in Generic Letter 91-__.]

[The table of containment isolation valves identified specific manually-operated locked or sealed closed valves with a footnote stating that these valves may be opened on an intermittent basis under administrative control.]
OR [With the removal of the table of containment isolation valves, the operability requirements have been stated in general terms that apply to all containment isolation valves including those that are locked or sealed closed.]
These valves are locked or sealed closed consistent with the regulatory requirements for manually-operated valves that are used as containment isolation valves. Because opening these valves would be contrary to the operability requirements of these valves, the following footnote to the LCO has been proposed:

Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

This change is consistent with the guidance in Generic Letter 91-__ and is, therefore, acceptable.

The licensee has proposed the removal of Table 3.8-1, "Containment Penetration Conductor Overcurrent Protective Devices" that is referenced in TS 3/4.8.4.2. With the removal of this table, the licensee has proposed to include the following statement for the LCO under TS 4.8.3.2:

Primary and backup containment penetration conductor overcurrent protective devices associated with each containment electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those for which credible fault currents would not exceed the electrical penetration design rating.

In addition, the licensee has proposed to revise TS 4.8.3.2 to remove the reference to Table 8.3-1. The surveillance requirement has been revised to state the following:

The above noted primary and backup containment penetration conductor overcurrent protective devices shall be demonstrated OPERABLE:

The licensee has proposed the removal of Table 3.8-2, "Motor-Operated Valves Thermal Overload Protection," that provides a list of valves with bypass devices that is referenced in TS 3.8.4.3. With the removal of this table, the licensee has proposed to include the following statement of the LCO under TS 3.8.3.3:

The thermal overload protection and bypass devices, integral with the motor starter, of each valve used in safety systems shall be OPERABLE.

The licensee has proposed changes to the above TS that are consistent with the guidance provided in Generic Letter 91-___. In addition, the licensee has provided an updated copy of Bases Section of TS 3.6.4 that addresses appropriate considerations for opening locked or sealed closed valves on an intermittent basis. Finally, the licensee has confirmed that component lists removed from the TS have been updated to identify all components for which the TS requirements apply and are located in controlled plant procedures. [These lists of components will also be included in the next revision of the updated safety analysis report.] (NOTE to PMs: The inclusion of this list in the next FSAR update is not a requirement, but the SER should reflect any commitment by the licensee to do so.)

On the basis of its review of this matter, the staff finds that the proposed changes to the TS for [plant name] Units 1 and 2 are primarily an administrative change that does not alter the requirements set forth in the existing TS. However, the applicability of the operability requirements will extend to all containment isolation valves as noted in this evaluation. Overall, these changes will allow licensees to make corrections and updates to the list of components for which these TS requirements apply, under the provisions that control changes to plant procedures as specified in the Administrative Controls Section of the TS. Therefore, the staff finds that the proposed TS changes are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the (name of State) State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on

such finding (56 FR) Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Thomas G. Dunning, OTSB
_____, PD-__

Date:

LIST OF RECENTLY ISSUED GENERIC LETTERS

Generic Letter No.	Subject	Date of Issuance	Issued To
91-05	LICENSEE COMMERCIAL-GRADE PROCUREMENT AND DEDICATION PROGRAMS	04/09/91	ALL HOLDERS OF OLs AND CPs FOR NUCLEAR POWER REACTORS
91-04	CHANGES IN TECHNICAL SPECIFI- CATION SURVEILLANCE INTERVALS TO ACCOMMODATE A 24-MONTH FUEL CYCLE	04/02/91	ALL HOLDERS OF OLs OR CPs FOR NUCLEAR POWER REACTORS
91-03	REPORTING OF SAFEGUARDS EVENTS	03/06/91	ALL HOLDERS OF OLs OR CPs FOR NUCLEAR POWER REACTORS AND ALL OTHER LICENSED ACTIVITIES INVOLVING A FORMULA QUANTITY OF SPECIAL NUCLEAR MATERIAL (SNM)
91-02	REPORTING MISHAPS INVOLVING LLW FORMS PREPARED FOR DISPOSAL	12/28/90	ALL OPERATORS OF LOW-LEVEL RADIO- ACTIVE WASTE (LLW) DISPOSAL SITES, WASTE PROCESSORS, & ALL HOLDERS OF LICENSES FOR NUCLEAR FUELS, NUCLEAR MATERIALS & NUCLEAR POWER REACTORS
91-01	REMOVAL OF THE SCHEDULE FOR THE WITHDRAWAL OF REACTOR VESSEL MATERIAL SPECIMENS FROM TECHNICAL SPECIFICATIONS	01/04/91	ALL HOLDERS OF OLs OR CPs FOR NUCLEAR POWER PLANTS
90-09	ALTERNATIVE REQUIREMENTS FOR SNUBBER VISUAL INSPECTION INTERVALS AND CORRECTIVE ACTIONS	12/11/90	ALL LIGHT-WATER REACTOR LICENSEES AND APPLICANTS
89-10 SUPP. 3	CONSIDERATION OF THE RESULTS OF NRC-SPONSORED TESTS OF MOTOR-OPERATED VALVES	10/25/90	ALL LICENSEES OF OPERATING NUCLEAR POWER PLANTS AND HOLDERS OF CONSTRUC- TION PERMITS FOR NUCLEAR POWER PLANTS
90-08	SIMULATION FACILITY EXEMPTIONS	08/10/90	ALL HOLDERS OF OPERATING LICENSES OR CONSTRUCTION PERMITS FOR NUCLEAR POWER REACTORS