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

January 10, 1983

1/10/83

TO ALL BOILING WATER REACTOR LICENSEES

Gentlemen:

Subject: NUREG-0737 Technical Specifications (Generic Letter No. 83-02)

NUREG-0737, "Clarification of TMI Action Plan Requirements," identifies those items for which Technical Specifications are required. Technical Specifications are required to provide assurance that facility operation is maintained within the limits determined acceptable following implementation at each facility. The scope and type of specification should include appropriate actions if limiting conditions for operation cannot be met. Relevant surveillance requirements for installed equipment should also be included.

A number of NUREG-0737 items which require Technical Specifications were scheduled for implementation by December 31, 1981. Each of those items is present in Enclosure 1. Included in the enclosure is guidance on the scope of a specification which the staff would find acceptable. Enclosure 2 are samples in Standard Technical Specification format with blanks or parentheses appearing where the information is plant specific. It includes appropriate pages as background information for facilities that do not have Standard Technical Specifications. These samples are for your information only.

We solicited comments on proposed Technical Specifications from the boiling water reactor owners group and Atomic Industrial Forum. Appropriate comments have been incorporated. We request that you review your facility's Technical Specifications to determine if they are consistent with the guidance provided in Enclosure 1. For those items where you identify deviations or absence of a specification, we request that you submit an application for a license amendment. The Bases Section should be revised, as appropriate, to reflect the changes made in Technical Specifications. If some of the items are not yet implemented at your facility, you should submit an amendment request at the time they are implemented. Please respond within 90 days of receipt of this letter.

This request for information was approved by the Office of Management and Budget under clearance number 3150-0065 which expires May 31, 1983

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

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INFO
LTR

Enclosures: See jacket
As stated

cc: See next page

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TO ALL BOILING WATER REACTOR LICENSEES

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SUBJECT: NUREG-0737 TECHNICAL SPECIFICATIONS

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Sincerely,

DSI Darrell G. Eisenhut, Director
RMattson Division of Licensing
12/30/82 Office of Nuclear Reactor Regulation

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NRC FORM 318 (10-80) NRCM 0240 OFFICIAL RECORD COPY USGPO: 1981—335-9

STAFF GUIDANCE OF NUREG-0737 TECHNICAL SPECIFICATIONS

(ITEMS SCHEDULED TO BE IMPLEMENTED BY DECEMBER 31, 1981)

(1) STA Training (I.A.1.1.3)

Our July 2, 1980, letter provided model Technical Specifications (TSs) for TMI lessons learned Category "A" items. Included were TSs that specified the qualifications, training and on-duty requirements for the Shift Technical Advisors (STA). STA training requirements are under consideration by the Commission. Further guidance will be provided pending decision regarding engineering expertise on shift by the Commission.

(2) Limit Overtime (I.A.1.3)

On June 15, 1982 we transmitted to licensees a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In the same letter we also transmitted revised pages to NUREG-0737 (Item 1.A.1.3). The administrative section of the technical specifications should be revised to require procedures that follow the policy statement guidelines. An acceptable specification would be "the amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12)," or following the model TSs in Enclosure 2.

(3) Dedicated Hydrogen Penetrations (II.E.4.1)

Plants that use external recombiners or purge/repressurization systems for post-accident combustible gas control of the containment atmosphere should provide containment penetrations dedicated to that service. The acceptable alternative is a combined design for use by either external recombiners or purge/repressurization systems and other systems which meet the requirements of Section 50.44 of 10 CFR Part 50. In satisfying this item, some plants may have to add some additional piping and valves. If so, these valves should be subjected to the requirements of Appendix J, and the TSs should be modified accordingly.

(4) Containment Pressure Setpoint (II.E.4.2.5)

The containment pressure setpoint that initiates containment isolation must be reduced to the minimum compatible with normal operating conditions. Most plants provided justification for not changing their setpoint and we approved their justifications by separate correspondence. The remaining plants have submitted a change to the TSs with the lower containment pressure setpoint. No further actions are required.

(5) Containment Purge Valves (II.E.4.2.6)

Model TSs are being sent separately to each plant as part of the overall containment purge and vent system review. Technical Specifications will be reviewed separately for each plant. In general, these TSs include the requirement that:

a. Containment purge or vent valves be locked closed if found not qualified for operation during a LOCA, and be verified locked closed at least every 31 days;

b. Containment purge or vent valves be used only when needed for safety related reasons;

c. Containment purge or vent valves with resilient seals be subjected to leakage testing and periodic resilient seal replacement.

Allowable time period in each year for purge/vent operation at each plant will be considered on a case-by-case basis.

(6) Radiation Signal on Purge Valves (II.E.4.2.7)

NUREG-0737 requires that containment purge and vent isolation valves must close on a high radiation signal to reduce the amount of radiation released outside containment following a release of radioactive materials to containment. The BWR Owners' Group has taken exception to this requirement and submitted their evaluation to NRC. NRC is currently reviewing the latest submittal of the Owners' Group. Technical Specifications for this item will be established after the technical resolution of this issue is completed.

(7) Reporting SV and RV Failures and Challenges (II.K.3.3)

NUREG-0660 stated that safety and relief valve failures be reported promptly and challenges be reported annually. The sections of your TSs that discuss reporting requirements should be accordingly changed; model TSs are given in Enclosure 2. Note that an acceptable alternative would be to report challenges monthly.

(8) RCIC Restart and RCIC Suction (II.K.3.13, II.K.3.22)

The design of RCIC should be modified such that:

1) The system will restart on subsequent low water level after it has been terminated by a high water level signal;

2) RCIC system suction will automatically switchover from the condensate storage tank to the suppression pool when the condensate storage tank level is low.

Provide technical specifications for both of the above modifications. It could be included with other technical specifications for the RCIC system. Typical acceptable limiting conditions for operation (LCO) and surveillance requirements, for instrumentation and system operational capability, are given in Enclosure 2.

(9) Isolation of HPCI and RCIC Modification (III.K.3.15)

The pipe break-detection circuitry should be modified so that pressure spikes resulting from HPCI and RCIC system initiation will not cause inadvertent system isolation. The plants using a time delay relay for this modification should change their technical specification to include the time delay added by the relay in the isolation system instrumentation response time. The minimum and maximum expected response time should be provided as discussed in the sample TSs (in Enclosure 2).

The minimum expected response time is a plant specific value. The maximum expected response time should not be higher than seven seconds unless the licensee provides proper justification for selecting a higher response time. The plants which don't have isolation system response time in their Technical Specifications, should include the setpoint and the surveillance requirements on the time delay relay in the TSs.

(10) Interlock on Recirculation Pump Loops (II.K.3.19)

Interlocks are required on nonjet pump plants (other than Humboldt Bay) to assure that at least two recirculation loops are open for recirculation flow for modes other than cold shutdown. This is to assure that the level measurements in the downcomer region are representative of the level in the core region.

Since there are very few plants affected by this modification and the change may be plant specific, we advise these plants to develop the technical specification and submit to the staff. The technical specification should include some surveillance requirements on the instrumentations and the corrective actions to be taken in case of instrumentation malfunction or failure.

(11) Common Reference Level (II.K.3.27)

All level instruments should be referenced to the same point. If a figure defining reactor vessel water levels is included in the Technical Specifications of your plant, it should be changed to reflect the common reference level established by this Action Plan Item. A sample figure is given in Enclosure 2.

(12) Manual Depressurization (II.K.3.45)

Technical resolution of this Action Plan Item has just been completed. The staff will not require any modifications in plant design and operation. Therefore no changes to Technical Specifications will be required.