December 16, 2003

Technical Specifications Task Force
11921 Rockville Pike
Suite 100
Rockville, MD 20852

Dear Members of the TSTF:

References: 1. Letter to Mr. Anthony Pietrangelo from William D. Beckner
Dated July 1, 2003, Subject: NRC Comments on TSTF-448

This is to inform you of our response to traveler TSTF-448, R.1 "Control Room Habitability" containing proposed changes to the improved Standard Technical Specifications (iSTS), initiated by the Technical Specification Task Force (TSTF).

TSTF-448, R.1 revised the Required Actions, and Surveillance Requirements associated with the control room habitability and boundary integrity to STS 3.7.10 “Control Room Emergency Ventilation System (CREVS)” to NUREG-1430 Babcock & Wilcox (B&W) STS, STS 3.7.10 “Control Room Emergency Filtration System (CREFS)” to NUREG-1431 Westinghouse (W) STS, STS 3.7.11 “Control Room Emergency Air Cleanup System (CREACS)” to NUREG-1432 Combustion Engineering (CE) STS, STS 3.7.4 “Main Control Room Environmental Control (MCREC) System” to NUREG-1433 General Electric - BWR/4 STS, and STS 3.7.3 “Control Room Fresh Air (CRFA) System to NUREG-1434 General Electric BWR/6 STS based on the staff comments in Ref. 1 and the NRC/TSTF meeting on July 11, 2003. The proposed change also revises STS 5.5 “Programs and Manuals” and STS 5.6 “Reporting Requirements “ for all NUREGs to add a Control Room Integrity Program and associated reporting requirements. These changes are the TSTF’s proposal to modify the STS consistent with Generic Letter (GL) 2003-01 “Control Room Habitability,” and the guidance specified in RG 1.196 “Control Room Habitability at Nuclear Power Reactors.”

The Staff has reviewed traveler TSTF-448, R.1 and has the following comments:

1. **Insert 3**
The language for the Condition B Bases is very similar to that proposed for Condition D. Both propose that the condition may be for unintentional and intentional entries into the condition. The two Conditions differ in that Condition B applies when the objectives of the Control Room Integrity Program can still be met with compensatory measures in place, but Condition D applies when these objectives cannot be met even with compensatory measures in place. The staff requests clarification of how licensees would make this distinction in practice, absent performing a test. The Bases for Condition B and Condition D needs to be re-written to clarify this consideration.

2. **Insert 5**

Insert 5 proposes adding the Control Room Integrity Program to the Administrative Control Programs and Manuals Section of the Standard Technical Specifications (STS). The following issues need to be addressed:

a) The accident does not arise from a radiological event, hazardous chemicals, or a smoke challenge as stated in the first sentence of the program. Therefore, the words "an accident arising from" should be removed.

The word guidance in the last sentence of the first paragraph differs from the majority of other programs in the STS. All programs in STS Section 5.5 that provide a list of elements to include in a program do not include the word guidance. Typically they state: "...the program shall include the following:." While guidance is needed within the program, use of the word "guidance" in this context dilutes the essential elements that need to be included in the program. "Guidance" implies providing direction, but not requiring the essential elements. For example, with the proposed wording the program could provide a description of how to define the control room envelope without actually describing it. Therefore, the words "guidance on" should be removed.

Therefore, the staff proposes the use of the following paragraph to address the above issues and make the wording consistent with existing STS programs:

"A Control Room Integrity Program shall be established and implemented to ensure that the control room integrity is maintained such that a radiological event, hazardous chemicals, or a smoke challenge will not prevent the control room operators from controlling the reactor during accident conditions. The program shall provide controls to limit radioactive gas, toxic gas, and smoke leakage into the control room from sources external to the control room envelope to levels that support control room habitability, in accordance with [10 CFR 50, Appendix A, General Design Criteria 19]. The program shall include the following elements:"

b) The Control Room Integrity Program states that the following shall be a part of the program: "Testing for control room inleakage in accordance with the testing **protocols** and at the frequencies specified in Regulatory Guide 1.197..." The use of protocols in the context of Regulatory Guide 1.197 is not clear. The word protocol is not used in Regulatory Guide 1.197 nor within the STS Section 5.5 text (only Westinghouse specifications were checked.) Since a regulatory guide provides guidance, the staff proposes that the word "guidance" be used instead of "protocol" to avoid confusion. As an alternate resolution, the staff also proposes that the phrase "the testing protocols" be removed to be consistent with other STS Section 5.5 references to Regulatory Guides.

c) The element concerning configuration control needs to be strengthened consistent with the Bases of the technical specification that states: “In addition, the control room boundary must be maintained, including the integrity of walls, floors, ceilings, ductwork and access doors.” Specific boundary interfaces should be identified to be in the maintenance program. Therefore, the program should specify that maintenance should include preventive maintenance of doors, wall/roof/floor penetrations, dampers and floor drains that are part of the control room envelope.

d) The Control Room Integrity Program must use the methods and assumptions contained in the facility’s design basis analysis for determining compliance with [10 CFR 50, Appendix A, General Design Criteria 19] to establish the limits on control room radioactive and hazardous chemical inleakage.

e) The letter or numeration of the subparagraphs in Inserts 5A through 5C are different when they should be the same.

3. **Insert 7**
Insert 7 lacks clarity. It references objectives in the Control Room Integrity Program that are not explicitly specified as objectives. The objectives should be clearly stated within the program or they should be repeated in Insert 7.

4. **Insert 9**
Insert 9 is not needed. The LCO should retain the words “within the assumptions of the design analysis.”

5. **Condition B Bases**
TSTF-448, R.1 proposes a change to the existing Condition B Bases that eliminates the phrase “and physical security” from the Bases. This change should be outside the scope of TSTF-448. The change involves an issue not previously identified in Revision 0 of TSTF-448 and could delay the issuance of TSTF-448, R.1 since it should involve an additional review by the Office of Nuclear Security and Incident Response.

6. **Condition D Bases**
The Reviewer’s Note needs to be deleted. As written it could prevent entry into Condition D if the licensee decided not to create the written procedures required by the note. Instead the Reviewer’s Note should now read: “Adoption of TSTF-448 is dependent on a commitment from the licensee to have written procedures available describing compensatory measures to be taken in the event of an intentional or unintentional entry into Conditions B or D.

Proposed Condition D (BWOG) states: 1) "compensatory measures (consistent with the intent of GDC 19) **should** be utilized...," and 2) "preplanned measures **should** be available to address these concerns for intentional and unintentional entry into the Condition." These are not consistent with the "Reviewers Note" that states that Condition D **is** dependent upon a commitment from the licensee to have written procedures available describing compensatory measures to be taken in the event of entry into Condition D, and the justification for the 24-hour Completion Time. This justification states that: "The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and **the use of compensatory measures**." Therefore, the word **should** in statements 1 and 2 (provided above) needs to be changed to **must**. These changes will make these statements consistent with the note and the justification for the 24 hour Completion Time. This wording would also make the Condition D Bases consistent with the wording in proposed Insert 3.

7. **Condition B Bases and D Bases**
The phrase, "consistent with the intent of GDC 19" should be changed to "consistent with the intent of [10 CFR 50, Appendix A, General Design Criterion 19]" to be consistent with the format used to reference GDC 19 in the proposed Control Room Integrity Program.

Please contact Craig Harbuck at (301) 415-3140 or cch@nrc.gov if you have any questions or need further information on these comments.

Sincerely,

/RA/
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Technical Specifications Section
Reactor Operations Branch
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Office of Nuclear Reactor Regulation

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7. **Condition B Bases and D Bases**
The phrase, "consistent with the intent of GDC 19" should be changed to "consistent with the intent of [10 CFR 50, Appendix A, General Design Criterion 19]" to be consistent with the format used to reference GDC 19 in the proposed Control Room Integrity Program.

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