# Industry/TSTF Standard Technical Specification Change Traveler

**Added statement clarifying the intent of the RCS water inventory balance surveillance**

Priority/Classification 1) Correct Specifications

NUREGs Affected: ☑ 1430 ☑ 1431 ☑ 1432 ☐ 1433 ☐ 1434

Description:

The RCS operational leakage surveillance was revised to clarify the intent of the surveillance.

Justification:

Clarification of the intent of the water inventory balance surveillance was added. This change clarifies the intent of the surveillance and makes it consistent with the wording of the other surveillance in the Specification and with other Surveillances in the NUREG.

## Revision History

**OG Revision 0** **Revision Status: Active** **Next Action:**

Revision Proposed by: Calvert Cliffs

Revision Description:
Original Issue

### Owners Group Review Information

Date Originated by OG: 17-Jan-96

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 24-Jan-96

### TSTF Review Information

TSTF Received Date: 05-Mar-96 Date Distributed for Review 07-Mar-96

OG Review Completed: ☑ BWOG ☑ WOG ☑ CEOG ☑ BWROG

TSTF Comments:

Applicable to all PWRs. May be below threshold, but accepted.

TSTF Resolution. Approved Date: 16-Apr-96

### NRC Review Information

NRC Received Date: 12-Jun-96 NRC Reviewer: M. Weston

NRC Comments:

9/18/96 - Approved.

Final Resolution: NRC Approves Final Resolution Date: 18-Sep-96

## Incorporation Into the NUREGs

File to BBS/LAN Date: TSTF Informed Date: 11-Mar-97 TSTF Approved Date:

NUREG Rev Incorporated:

## Affected Technical Specifications

SR 3.4.13.1 RCS Operational Leakage

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SURVEILLANCE REQUIREMENTS

| SURVEILLANCE | | FREQUENCY |
|---|---|---|
| SR 3.4.13.1 | ----------NOTE----------<br>Not required to be performed in MODE 3 or 4 until 12 hours of steady state operation.<br>---------- | -----NOTE-----<br>Only required to be performed during steady state operation<br>---------- |
| | ~~Perform~~ RCS water inventory balance. | 72 hours |
| SR 3.4.13.2 | Verify steam generator tube integrity is in accordance with the Steam Generator Tube Surveillance Program. | In accordance with the Steam Generator Tube Surveillance Program |

Verify RCS Operational Leakage is within limits by performance of

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SURVEILLANCE REQUIREMENTS

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|---|---|---|
| SR 3.4.13.1 | ----------NOTE----------<br>Not required to be performed in MODE 3 or 4 until 12 hours of steady state operation.<br>---------- | -----NOTE-----<br>Only required to be performed during steady state operation<br>---------- |
| | ~~Perform~~ RCS water inventory balance. | 72 hours |
| SR 3.4.13.2 | Verify steam generator tube integrity is in accordance with the Steam Generator Tube Surveillance Program. | In accordance with the Steam Generator Tube Surveillance Program |

Verify RCS Operational leakage is within limits by performance of

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SURVEILLANCE REQUIREMENTS

| | SURVEILLANCE | FREQUENCY |
|---|---|---|
| SR 3.4.13.1 | ----------NOTE----------<br>Not required to be performed in MODE 3 or 4 until 12 hours of steady state operation.<br>---------- | -----NOTE------<br>Only required to be performed during steady state operation<br>---------- |
| | ~~Perform~~ RCS water inventory balance. | 72 hours |
| SR 3.4.13.2 | Verify SG tube integrity is in accordance with the Steam Generator Tube Surveillance Program. | In accordance with the Steam Generator Tube Surveillance Program |

Verify RCS Operational LEAKAGE is within limits by performance of

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October 15, 1996

Donald Hoffman
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Don;

Recently, TSTF-60 was approved by the NRC. I have a concern with the impact that this ITS generic change will have on the Improved Standard Technical Specifications (ISTS) NUREGs.

TSTF-60 revises the ACTIONS table associated with the RCS Leakage Detection Instrumentation Specification (NUREG-1430 Specification 3.4.15, NUREG-1431 Specification 3.4.15, NUREG-1432 Specification 3.4.15, NUREG-1433 Specification 3.4.6, and NUREG-1434 Specification 3.4.7) to provide an exception to LCO 3.0.4 for all ACTIONS instead of specific ACTIONS (ACTIONS A and B in all NUREGs and ACTION D in the BWR NUREGs). I believe the TSTF-60 revision sends a mixed message to the ISTS user by allowing a MODE change (a plant startup) to occur with all required leakage detection instrumentation inoperable while at the same time requiring entry into LCO 3.0.3. The last sentence of the Bases for the LCO 3.0.4 exception states, "This allowance is provided because other instrumentation is available to monitor RCS leakage." This Bases statement contradicts the Bases of ISTS ACTION F which states, "With all required monitors inoperable, no required automatic means of monitoring LEAKAGE are available and immediate plant shutdown in accordance with LCO 3.0.3 is required."

If you have any questions, please call me.

Sincerely,

Gregg W. Ellis