

November 13, 2004

Technical Specification Task Force  
11921 Rockville Pike  
Suite 100  
Rockville, MD 200852

Dear Members of the TSTF:

The Nuclear Regulatory Commission (NRC) has completed the review of the Technical Specification Task Force Change Traveler, TSTF-433, R.0, "Eliminate SR 3.8.2.1, redundant Note from the PWR ITS NUREGs."

The staff has approved the proposed change. The Staff's Safety Evaluation Report for TSTF-433 is enclosed.

Please contact me at (301) 415-0184 or e-mail [thb@nrc.gov](mailto:thb@nrc.gov) if you have any questions or need further information on these proposed changes.

Sincerely,

*/RA/*

Thomas H. Boyce, Section Chief  
Technical Specifications Section  
Reactor Operations Branch  
Division of Inspection Program Management

cc: Dennis Buschbaum, (WOG)  
Bertram Morris, (BWROG)  
Patricia Furio, (CEOG)  
Paul Infanger, (BWOOG)  
Donald Hoffman, (EXCEL)  
Brian Mann, (EXCEL)

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
TECHNICAL SPECIFICATION TASK FORCE-433, Rev.0 ELIMINATION OF SR 3.8.2.1,  
REDUNDANT NOTE FROM THE PWR ITS NUREGs

## 1.0 INTRODUCTION

By letter dated June 6, 2002, Nuclear Energy Institute (NEI) submitted Technical Specification Task Force Change Traveler, TSTF-433, R.0, "Eliminate SR 3.8.2.1, Note from the PWR ITS NUREGs." Specifically, the proposed revisions eliminate Note 2 in SR 3.8.2.1 from the PWR ITS NUREGs (NUREGs-1430 through 1432) and delete SR 3.8.1.12 and SR 3.8.1.19 from STS 3.8.2. Note 2 is only required for BWRs and was erroneously included in the PWR STS.

## 2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include TSs as part of the license. The TSs ensure the operational capability of structures, systems and components that are required to protect the health and safety of the public. The Commission's regulatory requirements related to the content of the TSs are contained in 10 CFR Section 50.36. That regulation requires that the TSs include items in the following specific categories: (1) safety limits, limiting safety systems settings, and limiting control settings (50.36(c)(1)); (2) Limiting Conditions for Operation (50.36(c)(2)); (3) Surveillance Requirements (50.36(c)(3)); (4) design features (50.34(c)(4)); and (5) administrative controls (50.36(c)(5)).

In general, there are two classes of changes to TSs: (1) changes needed to reflect modifications to the design basis (TSs are derived from the design basis), and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required content and preferred format of TSs over time. This amendment deals with the second class of changes because it corrects an error in the PWR STS.

In determining the acceptability of revising STS 3.8.2, the staff used the accumulation of generically approved guidance in NUREG-1430, "Standard Technical Specifications, Revision 3 Babcock and Wilcox Plants," dated June, 2004; NUREG-1431, Revision 3, "Standard Technical Specifications, Westinghouse Plants," dated June, 2004; and NUREG-1432, "Standard Technical Specifications, Revision 3 Combustion Engineering Plants," dated June, 2004.

Licenses may revise the technical specifications to adopt current improved standard technical specification format and content provided that plant-specific review supports a finding of continued adequate safety because: (1) the change is editorial, administrative or provides clarification (i.e., no requirements are materially altered), (2) the change is more restrictive than the licensee's current requirements, or (3) the change is less restrictive than the licensee's current requirements, but nonetheless still affords adequate assurance of safety when judged against current regulatory standards. The detailed application of this general framework, and additional specialized guidance, are discussed in Section 3.0 in the context of specific proposed changes.

Enclosure

### 3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the justification for the proposed TSTF as described in the June 6, 2002 submittal. The detailed evaluation below will support the conclusion 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.

#### 3.1 Elimination of Note 2 in SR 3.8.1 from PWR ITS NUREGs

The TSTF proposes to eliminate Note 2 in SR 3.8.2.1 from the PWR ITS NUREGs (NUREGs-1430 through 1432). Note 2 states: "SR 3.8.1.12 and SR 3.8.1.19 are not required to be met when associated ECCS subsystem(s) are not required to be OPERABLE per LCO 3.5.3, "ECCS-Shutdown"." SR 3.8.1.12 and SR 3.8.1.19 verify the Operability of the ESF actuation signal to auto-start the DGs. Note 2 is required for BWRs and was erroneously included in the PWR STS. The BWR ECCS Shutdown LCO requires associated ECCS subsystem(s) Operability in Modes 4 and 5. For PWRs associated ECCS subsystem(s) are required to be Operable in Modes 1, 2, 3 and 4. Note 2 states that the ESF surveillance is not required when associated ECCS subsystem(s) are not required to be OPERABLE, which is only in Modes 5 and 6 for PWRs. Note 2 conflicts with SR 3.8.1 since the circumstances described in Note 2 apply in Modes 5 and 6 and SR 3.8.1 applies to Modes 1, 2, 3, and 4 for PWRs. Based on the staff's review, we conclude that eliminating Note 2 from the PWR ITS NUREGs (NUREGs-1430 through 1432) is acceptable.

#### 3.2 Deleting SR 3.8.1.12 and SR 3.8.1.19 from STS 3.8.2 of PWR ITS NUREGs

The TSTF proposes to delete SR 3.8.1.12 and SR 3.8.1.19 from STS 3.8.2 for PWR ITS NUREGs (NUREGs-1430 through 1432). SR 3.8.1.12 and SR 3.8.1.19 are required for BWRs and were erroneously included in the PWR STS. SR 3.8.1.12 and SR 3.8.1.19 verify the Operability of the ESF actuation signal to auto-start the DGs and require the ESF auto start signal to be Operable for Modes 1, 2, 3 and 4. The requirements of STS 3.8.2 are required for Modes 5 and 6; therefore, SR 3.8.1.12 and SR 3.8.1.19 should not be required in STS 3.8.2 because SR 3.8.1.12 and SR 3.8.1.19 apply in Modes 1, 2, 3, and 4. Based on the staff's review, we conclude that deleting SR 3.8.1.12 and SR 3.8.1.19 from STS 3.8.2 of the PWR ITS NUREGs (NUREGs-1430 through 1432) is acceptable.

### 4.0 CONCLUSION

The changes proposed by TSTF-433 assure the clarity and accuracy of the STS. The NRC staff concludes that the proposed changes satisfy the industry practices and standards as contained in 10 CFR 50.36. On this basis, the NRC staff concludes that the changes proposed by TSTF-433 are acceptable.

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 amendments will not be inimical to the common defense and security or to the health and safety of the public.