

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-400, R.1, "Clarification of Surveillance Requirement on Bypass of noncritical DG Automatic Trips". The staff has approved the proposed change. The Staff's Safety Evaluation Report for TSTF-400 is attached.

Please contact me at (301) 415-0184 or e-mail 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
Office of Nuclear Reactor Regulation

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

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
TECHNICAL SPECIFICATION TASK FORCE-400, REV. 1
CLARIFICATION OF SURVEILLANCE REQUIREMENTS ON BYPASS OF NONCRITICAL
DG AUTOMATIC TRIPS

1.0 INTRODUCTION

By letter dated November 16, 2003, Nuclear Energy Institute (NEI) submitted Technical Specification Task Force Change Traveler, TSTF-400, R.1, "Clarification of Surveillance Requirement on Bypass of noncritical DG Automatic Trips". Specifically, the proposed revision to the STS clarifies that SR 3.8.1.13 demonstrates that DG noncritical protective functions are bypassed on a loss of voltage signal concurrent with an ESF actuation test signal. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG.

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.

In determining the acceptability of revising STS 3.8.1, 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; NUREG-1433, Revision 3, "Standard Technical Specifications, General Electric Plants, BWR 4," dated June, 2004; and NUREG-1434, "Standard Technical Specifications, Revision 3 General Electric Plants, BWR 6" dated June, 2004.

Enclosure

Licensees 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 requirement, or (3) the change is less restrictive than the licensee's current requirement, 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.

3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the justification for the proposed TSTF as described in the November 16, 2003 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 Clarification of Surveillance Requirement on Bypass of noncritical DG Automatic Trips

The TSTF clarifies SR 3.8.1.13 and the associated Bases to state that the SR only verifies that noncritical DG trips are bypassed. The noncritical DG trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. This change is editorial, providing clarification, and no STS requirements are materially altered. The staff concludes that revisions to SR 3.8.1.13 proposed in TSTF-400 are acceptable because they are editorial and do not change the requirements of the STS.

4.0 CONCLUSION

The changes proposed by TSTF-400 clarifies the Surveillance Requirement for verifying the bypass of noncritical DG trips. 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-400 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.