

TSTF

TECHNICAL SPECIFICATIONS TASK FORCE
A JOINT OWNERS GROUP ACTIVITY

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SUBJECT: Technical Specification Task Force (TSTF) Response to November 24, 2004 Notice of Opportunity To Comment on Model Safety Evaluation on Technical Specification Improvement To Modify Requirements Regarding The Addition of LCO 3.0.8 on the Inoperability of Snubbers Using the Consolidated Line Item Improvement Process

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject November 24, 2004 Federal Register Notice.

The TSTF is an activity sponsored by the Westinghouse Owners Group, the Boiling Water Reactors Owners Group, and the Babcock and Wilcox Owners Group. The TSTF is the author of the generic change (known as a Traveler) to the Improved Standard Technical Specifications, TSTF-372, Revision 4, "Addition of LCO 3.0.8, Inoperability of Snubbers," that is the subject of the Federal Register Notice.

Should you have any questions, please do not hesitate to contact us.

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Enclosure

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E-CEDS=ADM-03

SESP Review Complete

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1. On page 68416 of the Federal Register Notice, the middle column, first full paragraph, the following statements are made:

The risk impact of dynamic loadings other than seismic loads is not assessed.

These shock-type loads include thrust loads, blowdown loads, waterhammer loads, steamhammer loads, LOCA loads and pipe rupture loads. However, there are some important distinctions between non-seismic (shock-type) loads and seismic loads which indicate that, in general, the risk impact of the out-of-service snubbers is smaller for non-seismic loads than for seismic loads. First, while a seismic load affects the entire plant, the impact of a non-seismic load is localized to a certain system or area of the plant. Second, although non-seismic shock loads may be higher in total force and the impact could be as much or more than seismic loads, generally they are of much shorter duration than seismic loads. Third, the impact of non-seismic loads is more plant specific, and thus harder to analyze generically, than for seismic loads. For these reasons, licensees will be required to perform an engineering assessment every time LCO 3.0.8 is used and show that at least one train of each system that is supported by the inoperable snubber(s) would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads.

Similar statements are made in the Summary and Conclusions section, item 1.(e) on page 68419 of the Federal Register Notice, the middle column, last paragraph:

(e) Every time the provisions of LCO 3.0.8 are used licensees will be required to perform a risk assessment, and an operability assessment to show that at least one

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train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. The operability assessment, consistent with the plants licensing design basis, must be documented and available for inspection by the staff.

This requires licensees perform an engineering assessment or operability assessment every time LCO 3.0.8 is used to demonstrate that at least one train of each system that is supported by an inoperable snubber would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads and that the assessment must be documented and available for inspection by the NRC staff.

As the TSTF communicated to the NRC during development of TSTF-372, snubbers may be designed for loadings other than seismic loads. This can include thrust loads, blowdown loads, waterhammer loads, steamhammer loads, LOCA loads, and pipe rupture loads. Most snubbers are not designed for these types of loads. However, LCO 3.0.8 addresses only the seismic function of the snubber(s). In order to use LCO 3.0.8 for snubbers whose design loading conditions include considerations other than seismic loading, the affected snubber(s) should either be confirmed to be necessary for seismic functions only in the current plant conditions, or an assessment should be

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conducted to ensure the system supported by the snubber would remain functional, without the snubber in place, for design loads other than seismic.

Several changes are recommended.

- Performing and documenting the engineering assessment every time LCO 3.0.8 is used is unnecessary as it is unlikely that the design function of the snubbers will change. The Safety Evaluation should be revised to state that when LCO 3.0.8 is used, licensees must confirm that at least one train of each system that is supported by the inoperable snubber(s) would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads.
- The evaluation described is not an “operability assessment.” In order for LCO 3.0.8 to be needed, the system supported by the snubber to be removed from service would not be considered operable. The phrases “operability assessment” and “engineering assessment” should be replaced as described in the previous bullet.
- In item 1.(e), the Safety Evaluation uses the phrase “perform a risk assessment.” This phrase also appears on page 68420 of the Federal Register Notice, third column, in the No Significant Hazards Consideration (NSHC), Criterion 3 discussion. The proposed Technical Specifications state that “risk must be assessed and managed.” Item 1.(e) and the NSHC should be revised to be consistent with the proposed Technical Specifications.

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- Documenting the design functions of the snubber(s) for NRC inspection should not be required. As stated in TSTF-372, the risk assessments will be consistent with those performed to meet the requirements of 10 CFR 50.65(a)(4). It is not required that the risk assessments performed to meet the requirements of 10 CFR 50.65(a)(4) be documented. It would be inconsistent to require documentation of the particular portion of the 10 CFR 50.65(a)(4) risk assessments related to snubbers. In addition, this information exists in the plant's design documentation and it imposes an unnecessary burden on the licensee to record for this particular purpose otherwise generic information.
2. On page 68415 of the Federal Register Notice, the third column, first paragraph, the following statements are made:

Since the licensee controlled testing is done on only a small (about 10%) representative sample of the total snubber population, it is not expected to have more than a few snubbers supporting a given safety system out for testing at a time.

The statement "it is not expected to have more than a few snubbers supporting a given safety system out for testing at a time" does not appear in TSTF-372 and is not an assumption of the risk assessment that was performed to support the Traveler. The Traveler risk assessment assumed that the systems affected by removed snubbers are unavailable. Therefore, the number of removed snubbers is irrelevant. The statement implies that plants must impose some undefined limit (i.e., a "few") on the number of

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snubbers that can be simultaneously removed from a given system. Such a restriction is unnecessary and confusing. It is recommended that the sentence be revised to state, “Since the licensee controlled testing is done on only a small (about 10%) representative sample of the total snubber population, *typically only* ~~it is not expected to have more than~~ a few snubbers supporting a given safety system *are* out for testing at a time.” This changes the sentence from what could be construed as a requirement to a statement of fact.

3. On page 68419 of the Federal Register Notice, the third column, first paragraph prior to Section 4.0, State Consultation, the following statements are made:

Since the 10 CFR 50.65 (a)(4) guidance, Section 11 of NUMARC 93-01, does not currently address seismic risk, implementation guidance must be developed by licensees adopting this change to ensure that the proposed LCO 3.0.8 is considered in conjunction with other plant maintenance activities and integrated into the existing 10 CFR 50.65 (a)(4) process.

A similar statement is made on page 68418 of the Federal Register Notice, the third column, the last paragraph of Section 3.1.3. It is not necessary to develop independent “implementation guidance” to ensure that the proposed LCO 3.0.8 is considered in conjunction with other plant maintenance activities and integrated into the existing 10 CFR 50.65(a)(4) process. We recommend that the sentences be revised to state:

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Since the 10 CFR 50.65 (a)(4) guidance, Section 11 of NUMARC 93-01, does not currently address seismic risk, ~~implementation guidance must be developed by~~ licensees adopting this change ~~to~~ *must* ensure that the proposed LCO 3.0.8 is considered in conjunction with other plant maintenance activities and integrated into the existing 10 CFR 50.65 (a)(4) process.

4. On page 68414 of the Federal Register Notice, middle column, first paragraph, it is stated that prior to conversion to improved Standard Technical Specifications (STS), the 72-hour delay time provision that was typically included in the snubber technical specification was applicable only to snubbers found to be inoperable (i.e., emergent conditions only). This characterization is contrary to previous NRC positions (see References 4 and 5 of TSTF-372, Revision 4). It is a long standing industry practice to utilize the 72-hour delay for the removal of snubbers for maintenance and testing purposes, not only emergent conditions.