

February 7, 2005

Mr. Biff Bradley  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

Dear Mr. Bradley:

The Nuclear Regulatory Commission has reviewed the Nuclear Energy Institute Risk-Informed Technical Specifications Task Force (RITSTF) proposed change to the Standard Technical Specifications designated as TSTF-475. Enclosed are staff comments and requests for additional information (RAIs) on TSTF-475.

We are prepared to meet with you to further discuss these comments and RAIs.

Please contact me at (301) 415-1187 or e-mail [trt@nrc.gov](mailto:trt@nrc.gov) if you have any questions or need further information on these proposed changes.

Sincerely,

*/RA/*

T. R. Tjader, Senior Reactor Engineer  
Technical Specifications Section  
Reactor Operations Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: See attached page

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Mr. Biff Bradley

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Nuclear Energy Institute

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Mr. Donald Hoffman  
EXCEL Services Corporation

Request for Addition Information on  
Boiling Water Reactors Owners Group-Technical Specifications Task Force Traveler  
(TSTF-475) to revise Standard Technical Specifications to change Surveillance Requirement  
3.1.3.2 and clarify the application of Surveillance Requirement 3.0.2.

In the Boiling Water Reactors Owners Group (BWROG) letter to Thomas H. Boyce, Section Chief Technical Specifications Section, "Control Rod Notch Testing Frequency and Source Range Monitor Insert Control Rod Action," dated August 30, 2004, the BWROG submitted TSTF-475 proposing to revise the Standard Technical Specifications to change Surveillance Requirement (SR) 3.1.3.2, which proposes to change the frequency for notch testing fully withdrawn control rods at Boiling Water Reactor plants from 7 days to 31 days. In addition, the BWROG proposes to revise the Standard Technical Specifications to clarify the application of SR 3.0.2 where applicable. As a result of the staff review, the following need for additional information has been identified.

1. In Section 4: Technical Analysis, the BWROG mentions a review of industry operating experience that did not identify any incidents of stuck control rods identified via performance of a rod notch surveillance. Please provide information on the occurrences of stuck control rods identified, other than those during surveillances.
2. In Section 4: Technical Analysis, the BWROG states that the large number of tests that would still be performed will provide a very high confidence that any problems with the system would be identified. Please clarify what is meant by 'large number of tests'? Identify each test that will be performed and how each test provides a very high confidence that potential problems with the system would be identified prior to the control rods being unable to perform their safety function.
3. In Section 4: Technical Analysis, the BWROG discusses a proposed change to SR 3.1.3.2. This SR ensures compliance with the recommendations of General Electric Service Information Letter (SIL) No. 139, "Control Rod Drive Collet Retainer Tube Cracking, July 18, 1975." How will the revision to SR 3.1.3.2 continue to ensure compliance with SIL No. 139? The BWROG has proposed the revision of SR 3.1.3.2 based on a recent GE Nuclear Energy Report, "CRD Notching Surveillance Testing for Limerick Generating Station, GE-NE-0000-0024-9858 R0, February 2004." Please provide the staff with this report for review and how compliance with SIL No. 139 will be maintained.
4. In Section 4: Technical Analysis, the BWROG discusses how a collet housing failure could result in the inability to insert, withdraw, and or scram a control rod. As a result, the recommendations of SIL No. 139 were implemented, where each control rod drive mechanism is exercised weekly to detect failure. The staff was unable to find a collet housing failure event since the 1975 SIL No. 139 and requests that the BWROG provide information of any known occurrences and if it resulted in the inability to insert, withdraw, and or scram a control rod.

5. In Section 4: Technical Analysis, the second paragraph from the end of the section discusses the 25% grace period to facilitate surveillance scheduling and to avoid plant operating conditions that may not be suitable for conducting tests. If the revision to SR 3.1.3.2 is changed to 31 days for fully withdrawn control rods, will the 31 days with the 25% grace period provide the possibility of a significant reduction in a margin of safety?