NRC Slide 2

- Operability is, in part, based on satisfying LSSS requirements AND functioning as required

Comment – The definition of operability is:
  (1) performing the intended safety function(s)
  (2) the as-found/measured setpoint is conservative with respect to the AV
  (3) the as-found/measured setpoint is reset in accordance with the setpoint methodology to be consistent with the trip setpoint
  (4) the performance of SRs is satisfactory within specified tolerances
  (5) there is no other reason to believe the instrument is not operable

NRC Slide 3

- Normal Industry Practice: Set as-left setting to TSP

Comment – SMTF requests further discussion to clarify

- TSP Protects Safety Limit

Comment – The TSP or the AV protects the safety limit.

- Some evidence Licensees with AV Based LSSS may leave as-left setting at AV

Comments:
  (1) Outliers are not a basis for generic action
  (2) This is an enforcement issue

NRC Slide 4

- Therefore, to protect the SL and satisfy 10 CFR 50.36(c)(1)(ii)(A) the as-left instrument setting must be set to the TSP at the conclusion of each COT/CFT.

Comment – replace CFT with CALIBRATION, and include "within the calibration tolerance"

<u>NRC Slide 6</u>

- Allowable Values or Trip Setpoints can be defined as LSSS

Comment – TSP <u>are</u> defined as LSSS

- Technical Specification Bases provide additional guidance for protecting the SL

Comment – TS Bases provide <u>background or clarifying information about</u> the SL

- LSSS values are used to establish the limiting setpoints necessary to protect the AL

Comment – <u>TSPs are used to establish LSSS</u> to protect the AL

- Operability assessed whether the instrument channels are functioning property using combination of daily channel checks, quarterly channel operational test/channel functional test (COT/CFT), and refueling outage calibration tests

Comments –
   (1) "functioning" means capable of performing the intended safety function(s)
   (2) recognize that this is a partial list
   (3) calibration tests are not limited to refueling outages

- LSSS and Operability, while related, are two separate issues

Comment – SMTF is not clear what this means. Also, see operability comment on slide 2.

<u>NRC Slide 7</u>

- AV3 represents the limiting as-found value for an instrument functioning as expected

Comment – "as found" is a key term; we should be sure we are interpreting it the same way

<u>NRC Slide 10</u>

- AV3 does not establish a conservative limit

Comment – disagree (reference 12/17/04 letter)

- Assumed the as-left instrument setting was reset to the TSP cal prior to each Monte Carlo simulated test.

Comment – The assumption that the as-left instrument setting was reset to the TSP_{cal} prior to each Monte Carlo run is consistent with industry practice.

- Modeled the wrong problem: The analysis assessed whether the TSP cal protected the AL, not whether an A V based on Method 3 did.

Comment – The correct problem was modeled. The Monte Carlo analysis demonstrated that even badly drifting channels can be detected and called inoperable through surveillance test (measured TSP exceeds AV3) with sufficient sensitivity to protect the AL (actual TSP<AL) grater that 95% of the time.

<u>NRC Slide 11</u>

To meet 10 CFR 50.36
- As-left setting must be reset to within TOL of TSP_N
- Operability based on equipment functioning as required
- TSP_N equal to or more conservative than TSP_{cal}

Comments –
  (1) SMTF does not see the connection between 50.36 and the 1st and 3rd bullets
  (2) With respect to the 2nd bullet, see SMTF comment on slide 2.

<u>Slide 12</u>

- Recommend LSSS defined as TSP_{cal} based on TLU
  - Account for credible uncertainties

Comment – This is not consistent with Slide 11.

- As-Left Setting Returned to TSP_N
  - (2nd bullet) Controlled within calibration tolerance band – may exceed LSSS

Comments –
  (1) The as-left setting is <u>left or</u> returned to the TSP_N
  (2) The relevance of the 2nd bullet depends on our first comment on this slide

- Operability Band Based on Deviation Limit

Comments –
  (1) This is essentially a new "Method 4"
  (2) It is not needed because the current Methods 1, 2, and 3 are acceptable
  (3) There is no safety or cost/benefit basis for incurring the administrative overhead associated with implementation of new method

<u>NRC Slide 14</u>

- TSP-Based LSSS
  - Clarify expectations on operability

Comment – see comment on Slide 2

- AV-Based LSSS
  - Method 3 is not acceptable

Comment – disagree

  - Clarify expectations on operability

Comment – see comment on Slide 2

<u>NRC Slide 15</u>

- ## Method 3 is Not Acceptable to Set LSSS AVs

Comment – disagree

- ## Method 3 is Acceptable to Set LSSS TSPs

Comment – Methods 1 and 2 are also acceptable

- ## All Methods Must Provide Reasonable Assurance
  - ## SL is Protected
  - ## Equipment Functions as Required

Comment – "functions" means "intended safety function" as clarified by the improved Standard Technical Specifications

- ## TSTF/CLIIP Enhances Regulatory Certainty

Comment – The TSTF/CLIIP <u>process</u> enhances certainty