March 21, 2005

Technical Specifications Task Force
11921 Rockville Pike
Suite 100
Rockville, Maryland 20852

Dear Members fo the TSTF:

The Nuclear Regulatory Commission has reviewed the Technical Specifications Task Force (TSTF) 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 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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OFFICE	SRE:TSS:IROB:DIPM	SC:TSS:IROB:DIPM
NAME	TRTjader	THBoyce
DATE	03/21/2005	03/21/2005

OFFICIAL RECORD COPY

cc: Michael Crouthers (BWROG)
mhcrowthers@pplweb.com
PPL Susquehanna
Mail Code GEN PL4
Two North Ninth Street
Allentown, PA 18101-1179

Paul Infanger (BWOG)
Paul.Infanger@pgnmail.com
Crystal River Nuclear Plant
Mail Code NA1B
15760 W. Power Line Street
Crystal River, FL 34428

Technical Specifications Task Force
11921 Rockville Pike
Suite 100
Rockville, MD 20852

Ms. Patricia S. Furio (CEOG)
patricia.furio@constellation.com
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657
410-495-4374

Wes Sparkman (DWOG)
wasparkm@southernco.com
Southern Nuclear Operating Company
P.O. Box 1295/Bin 048
Birmingham, AL 35201

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to change Surveillance Requirement (SR) 3.1.3.2, which proposes to change the frequency for notch testing fully withdrawn control rods at Boiling Water Reactor plants from 7 days to 31 days.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.

Enclosure

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?