

April 13, 2005

Mr. Gordon Bischoff, Manager
Owners Group Program Management Office
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

SUBJECT: RESPONSE TO WESTINGHOUSE OWNERS GROUP WHITE PAPER,
"SINGLE-FAILURE CONSIDERATION WHEN TECHNICAL SPECIFICATION
ACTIONS ARE ENTERED" (TAC NO. MC5558)

Dear Mr. Bischoff:

This is in response to your letter number WOG-04-592, dated November 19, 2004, requesting NRC staff review of the Westinghouse Owners Group (WOG) White Paper, "Single Failure Consideration When Technical Specification Actions Are Entered." This White Paper was submitted in anticipation of a future WOG topical report proposing to add a technical specification (TS) remedial action to permit operation with two inoperable reactor trip system (RTS) or engineered safety features actuation system (ESFAS) channels rather than enter into a TS-required shutdown.

The Nuclear Regulatory Commission (NRC) staff has reviewed the WOG White Paper. In order to justify a temporary relaxation of the single-failure criterion, the WOG needs to provide the NRC staff with the operational necessity incurred by operating under the current design and licensing basis. For example, the operational necessity could be based on the hardware configuration (two-out-of-three logic); or the need to lift wires or add jumpers to perform required testing, which could create the potential for plant transients or reactor trips; or the time needed to do repairs or perform testing. Hence, the WOG must provide sufficient basis in the proposed topical report for a generic temporary relaxation to the single-failure criterion based on a generic industry-based operational necessity consideration.

The WOG stated that the proposed topical report would be risk-informed. The staff notes that according to Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," the WOG should evaluate the proposed TS change to assure: adequate defense-in-depth, maintenance of a sufficient safety margin, compliance with current regulations, and that any resulting increases in core damage frequency and risk are acceptable. Furthermore, a risk-informed submittal must be supported by a deterministic evaluation. However, we note that it is not obvious from the White Paper how either a risk-informed or deterministic evaluation could be supported successfully.

The WOG White Paper references the NRC and industry documents where temporary relaxations from the single-failure criterion were granted. Historically, the staff's position for temporary relaxation from the single-failure criterion is that the licensee has to identify a plant-specific operational necessity basis for the relaxation. Staff review of the references provided by the WOG has shown that these relaxations were granted based on operational necessity and to avoid unnecessary plant shutdowns that would have been required if relief had not been granted.

The staff also reviewed the Standard Technical Specifications (STSs) applicable to other Pressurized Water Reactor and Boiling Water Reactor plants and notes that a discrepancy exists in the Reactor Trip Instrumentation Technical Specifications related to relaxation from the single-failure criterion. The staff is currently revisiting these other STSs and will determine the need for any action.

Based on our review of the WOG White Paper, we believe that the WOG has not yet provided sufficient basis to support a topical report that proposes a TS Action to permit operation with two inoperable RTS or ESFAS instrument channels rather than enter into a TS-required shutdown. If you wish to discuss this issue further, you may request a meeting with the staff.

If you have any questions, please contact Mr. Girija Shukla at 301-415-8439.

Sincerely,

/RA/
Herbert N. Berkow, Director
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Project No. 694

cc:
Mr. James A. Gresham, Manager
Regulatory Compliance and Plant Licensing
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