TSTF-448 MEETING
CONTROL ROOM HABITABILITY
TECHNICAL SPECIFICATION

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TS Progression

January 2002	Draft Regulatory Guide 1.114
December 30, 2002	TSTF-448, Rev. 0
May 2003	Regulatory Guide 1.196
July 1, 2003	NRC Comments on Rev. 0
August 2003	TSTF-448, Rev. 1
December 16, 2003	NRC Comments on Rev. 1
March 8, 2004	TSTF Response to NRC's 12/16/03 Letter, Proposed Revision to WOG STS3.7.10
January 24, 2005	NRC Response to TSTF 3/8/04 Letter, Revision to WOG STSs 3.7.10, 3.7.12 - 3.7.14

NRC Presentation

- CRH TS Issues
- Issues Associated with Regulatory Guide 1.196 TS
- Resolution - January 24, 2005 TS

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Control Room Habitability TS Issues

- ΔP SR Unreliable for CRE Operability
- Failure to Recognize CREVS & CRE Contribute to CRH
- Treatment of CRE as Support System Results in Ambiguity Regarding Actions
  - Inleakage
  - Inoperable CRE Boundary
  - ΔP SR

Control Room Habitability TS Issues

Appendix B, Regulatory Guide 1.196

- Format - Condition Based Upon Failure to Meet SR
- Ambiguity - 2 CREVS Trains Inoperable Due to Excessive CRE Inleakage vs Inoperable CRE
- CRH Provided By CREVS **and** CRE
- CT for Inoperable CREVS vs Inoperable CRE
- Actions for a Failed ΔP SR
- Lack of VBTP Guidance
- CT Inconsistent With Other Risk-Informed TS

Format - Condition Based Upon Failure to Meet SR

Condition Restated

Ambiguity - 2 CREVS Trains Inoperable Due to Excessive CRE Inleakage vs Inoperable CRE

One Condition - CRE Inoperable

CRH Provided By CREVS and CRE

- LCO - 2 Trains of CREVS & CRE Operable
- Conditions & Actions Based Upon Equal & Independent Treatment

CT for Inoperable CREVS vs Inoperable CRE

- Inoperable CREVS Train(s) - Unchanged
- Inoperable CRE
  - 24 hrs
  - Restore or Meet GDC 19 with Mitigating Actions
  - Restore in 30 Days or Shutdown

Actions for a Failed ΔP SR

- SR Restated
- Directed to VBTP
- Limits in VBTP
- Limits Based Upon Measurements During E741 Testing
- Assessment of Reasons for ΔP Differences

Lack of VBTP Guidance

- Testing Guidance on Frequency, Rigor, Alignment, Circumstances
- Mitigating Actions
- ΔP & Ventilation System Flowrates
- Inleakage Values

CT Inconsistent With Other Risk-Informed TS

30 Days - Consistent with EPRI's Risked-Managed Technical Specifications (RMTS) Guidelines Initiative 4b

VBTP

- Consistency of Application for All Boundaries Served by TS Section 3.7 ESF Filtration & Ventilation Systems
- Potential Impact of Boudary Failure on Offsite & Onsite Consequences

TABLE 3-1

GENERIC RISK-INFORMED CTs WITH A BACK-STOP: EXAMPLE FORMAT

Actions Condition	Required Action	Completion Time
B. One (HPSI) subsystem inoperable.	B.1 Restore SI subsystem to OPERABLE status.	72 hours
	OR	
	B.2.1 Determine that the completion time extension beyond 72 hours is acceptable in accordance with established RMTS thresholds.	72 hours
	AND	
	B.2.2 Verify completion time extension beyond 72 hours remains acceptable.	In accordance with the RMTS Program
	AND	
	B.2.3 Restore subsystems SI to OPERABLE status.	**30 days or acceptable completion time, whichever is less**