FOR INCLUSION ON TECHNICAL SPECIFICATION WEB PAGE

THE FOLLOWING EXAMPLE OF AN APPLICATION WAS PREPARED BY THE NRC STAFF TO FACILITATE THE USE OF THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP). THE MODEL PROVIDES THE EXPECTED LEVEL OF DETAIL AND CONTENT FOR AN APPLICATION TO ADOPT REVISION 1 TO TECHNICAL SPECIFICATION TASK FORCE (TSTF)-454,"EXTEND PCIV [PRIMARY CONTAINMENT ISOLATION VALVE] COMPLETION TIMES (NEDC-33046)," USING CLIIP. LICENSEES REMAIN RESPONSIBLE FOR ENSURING THAT THEIR ACTUAL APPLICATION FULFILLS THEIR ADMINISTRATIVE REQUIREMENTS AS WELL AS NRC REGULATIONS.

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

SUBJECT: PLANT NAME, DOCKET NO. 50-[xxx,] RE: APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO EXTEND THE COMPLETION TIME FOR SELECTED PRIMARY CONTAINMENT ISOLATION VALVES

Gentlemen:

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), [LICENSEE] is submitting a request for an amendment to the technical specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed changes would revise TS 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," by extending to 7 days the completion time (CT) to restore an inoperable PCIV to operable status or to isolate the affected penetration flow path for selected primary containment penetrations with two (or more) PCIVs and for selected primary containment penetrations with only one PCIV. The change is consistent with NRC approved Industry Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-454, Revision 1, "Extend PCIV Completion Times (NEDC-33046)." The availability of this TS improvement was announced in the Federal Register (FR) on [DATE OF NOTICE OF AVAILABILITY] as part of the consolidated line item improvement process (CLIIP).

Enclosure 1 provides a discussion of description and assessment of the proposed change and confirmation of applicability. Enclosure 1 also includes one new regulatory commitment associated with this proposed change. Enclosure 2 provides the existing TS pages marked-up to show the proposed change. Enclosure 3 provides the existing TS Bases pages marked-up to reflect the proposed change (for information only). Changes to the TS Bases will be provided in a future update in accordance with the Bases Control Program. As required by the FR Notice of Availability, to address the conditions, Attachments 1 through 7 provide the discussions of the [LICENSEE'S] evaluations and supporting information with regard to the conditions.

[LICENSEE] requests approval of the proposed license amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated [STATE] Official.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by [LICENSEE] to make this request and that the foregoing is true and correct. [Note that request may be notarized in lieu of using this oath or affirmation statement].

If you should have any questions regarding this submittal, please contact [ ].

Sincerely,

Name, Title

Enclosures: 1. Description and Assessment
2. Proposed Technical Specification Changes
3. Proposed Technical Specification Bases Changes (if applicable)

cc: NRR Project Manager
Regional Office
Resident Inspector
State Contact

Description and Assessment

1.0 DESCRIPTION

The proposed changes would revise Technical Specification (TS) 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," by extending to 7 days the completion time (CT) to restore an inoperable PCIV to operable status or to isolate the affected penetration flow path for selected primary containment penetrations with two (or more) PCIVs and for selected primary containment penetrations with only one PCIV.

The changes are consistent with NRC approved Industry Owners' Group Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler TSTF-454, Revision 1, "Extend PCIV Completion Times (NEDC-33046)." The availability of this TS improvement was announced in the Federal Register on [DATE] as part of the consolidated line item improvement process (CLIIP) ([70 FR XXXXX]).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the safety evaluation published on [DATE] ([70 FR XXXXX]), as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-454, Revision 1. [LICENSEE] has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] TSs.

2.2 Optional Changes and Variations

[LICENSEE] is not proposing any variations or deviations from the TS changes described in TSTF-454, Revision 1, or the NRC staff's model safety evaluation published on [DATE].

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

[LICENSEE] has reviewed the proposed no significant hazards consideration determination published on [DATE]([70 FR XXXXX]) as part of the CLIIP. [LICENSEE] has concluded that the proposed determination presented in the notice is applicable to [PLANT] and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

The notice of availability published on [DATE]([70 FR XXXXX]), identified seven plant-specific verifications and one regulatory commitment for licensees to address in their applications to support the NRC staff's review of TS changes related to TSTF-454. [LICENSEE] has performed the requested verifications and each item is addressed below:

3.2.1 Conditions

(1) "Because not all penetrations have the same impact on core damage frequency (CDF), large early release frequency (LERF), incremental conditional core damage probability (ICCDP), or incremental conditional large early release probability (ICLERP), a licensee's application must provide supporting information that verifies the applicability of TR NEDC-33046, including verification that the PCIV configurations for the specific plant match the TR and the risk parameter values used in the TR are bounding for the specific plant. Any additional PCIV configurations or non-bounding risk parameter values not evaluated by the TR should be included in the licensee's plant-specific analysis. [Note that PCIV configurations or non-bounding risk parameter values outside the scope of the TR will require NRC staff review of the specific penetrations and related justifications for the proposed CTs.]"

[LICENSEE] has confirmed that the supporting information in TR NEDC-33046 is applicable to [PLANT, UNIT NOS.] and the licensing TR and the risk parameter values used in the TR are bounding for the specific plant. The penetrations affected by this change fall within the containment penetration configurations in the report. [ALTERNATIVELY, IDENTIFY THOSE CONTAINMENT PENETRATION CONFIGURATIONS NOT ADDRESSED BY THE TR AND PROVIDE THE PLANT-SPECIFIC ANALYSIS TO SUPPORT THE PROPOSED CHANGE.] Attachment 1 provides [LICENSEE's] evaluation, including the supporting information.

(2) "The licensee's application must provide supporting information that verifies that external event risk, either through quantitative or qualitative evaluation, will not have an adverse impact on the conclusions of the plant-specific analysis for extending the PCIV CTs."

[LICENSEE] has confirmed that external event risk, either through quantitative or qualitative evaluation, will not have an adverse impact on the conclusions of the plant-specific analysis for extending the PCIV CTs. Attachment 2 provides [LICENSEE's] evaluation including the supporting information.

(3) "Because TR NEDC-33046 was based on generic plant characteristics, each licensee adopting the TR must provide supporting information that confirms plant-specific Tier 3 information in their individual submittals. The licensee's application must provide supporting information that discusses conformance to the requirements of the maintenance rule (10 CFR 50.65(a)(4)), as they relate to the proposed PCIV CTs and the guidance contained in NUMARC 93-01, Section 11, as endorsed by Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants,"

including verification that the licensee's maintenance rule program, with respect to PCIVs, includes a LERF and ICLERP assessment as part of the maintenance rule process."

[LICENSEE] has confirmed that the plant-specific Tier 3 information for [PLANT UNIT NOS.] is consistent with the generic plant characteristics used in TR NEDC-33046. Also, [LICENSEE] has confirmed that [PLANT UNIT NOS.] conform to the requirements of the maintenance rule (10 CFR 50.65(a)(4)), as they relate to the proposed PCIV CTs and the guidance contained in NUMARC 93-01, Section 11, as endorsed by RG 1.182, including verification that the licensee's maintenance rule program, with respect to PCIVs, includes a LERF and ICLERP assessment as part of the maintenance rule process. Attachment 3 provides [LICENSEE's] evaluation including the supporting information.

(4) "The licensee's application must provide supporting information that verifies that a penetration remains intact during maintenance activities, including corrective maintenance activities. Regarding maintenance activities where the pressure boundary would be broken, the licensee must provide supporting information that confirms that the assumptions and results of the TR remain valid. This includes the assumption that maintenance on a PCIV will not break the pressure boundary for more than the currently allowed CT."

[LICENSEE] has confirmed that the extended CT under the proposed amendment will only be used for a penetration that remains intact during maintenance activities, including corrective maintenance activities. Also, [LICENSEE] has confirmed that, regarding maintenance activities where the pressure boundary would be broken, the assumptions and results of the TR remain valid. This includes the assumption that maintenance on a PCIV will not break the pressure boundary for more than the currently allowed CT. Attachment 4 provides [LICENSEE's] evaluation including the supporting information.

(5) "The licensee's application must provide supporting information that it will verify the operability of the remaining PCIVs in the associated penetration flow path before applying an extended CT for an inoperable PCIV."

[LICENSEE] has confirmed the operability of the remaining PCIVs in the associated penetration flow path before entering the CT for the inoperable PCIV. Attachment 5 provides [LICENSEE's] evaluation including the supporting information.

(6) "Simultaneously utilizing the proposed extended CT for multiple inoperable PCIVs and the resulting impact on risk were not specifically evaluated by the BWROG. However, TR NEDC-33046 does state that multiple PCIVs can be out of service simultaneously during extended CTs and does not preclude the practice. Therefore, the licensee's application must provide supporting information that confirms that its Tier 3 configuration risk management program (10 CFR 50.65(a)(4)) requires that simultaneous application of an extended CT to more than one inoperable PCIV in separate penetration flow paths is evaluated. The purpose of this evaluation is to ensure that the cumulative risk of continued plant operation with multiple inoperable PCIVs utilizing extended CTs does not exceed the plant risk value, as determined by the analysis presented in TR NEDC-33046."

[LICENSEE'S] Tier 3 configuration risk management program (10 CFR 50.65(a)(4)) requires that simultaneous extended CT entries for inoperable PCIVs in separate penetration flow paths are evaluated so as to ensure that the cumulative risk of extended multiple PCIV CTs do not exceed the acceptance guidelines, as confirmed by the analysis presented in TR NEDC-33046, and that adequate defense-in-depth for safety systems is maintained. [BRIEFLY, DESCRIBE THE TIER 3 CONFIGURATION RISK MANAGEMENT PROGRAM AND PROCEDURES THAT REFLECT THE REQUIREMENTS]. [LICENSEE] will perform such evaluation [STATE WHETHER A QUANTITATIVE, QUALITATIVE, OR COMBINATION OF QUALITATIVE AND QUANTITATIVE EVALUATION WILL BE PERFORMED.] to confirm that such simultaneous extended CT entries for inoperable PCIVs in separate penetration flow paths will not exceed the acceptance guidelines, as confirmed by the analysis presented in TR NEDC-33046, and that adequate defense-in-depth for safety systems is maintained. Attachment 6 provides [LICENSEE's] evaluation including the supporting information.

(7) "The licensee must provide supporting information that verifies that the plant-specific probabilistic risk assessment (PRA) quality is acceptable for this application in accordance with the guidelines given in RG 1.174, "An Approach for using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis." To ensure the applicability of TR NEDC-33046 to a licensee's plant, each licensee requesting an amendment must provide additional information on PRA quality in the following areas:

a. Justification that the plant-specific PRA reflects the as-built, as-operated plant.

b. Applicable PRA updates including individual plant examinations (IPE) and individual plant examinations of external events (IPEEE) findings.

c. Conclusions of the peer review including any A or B facts and observations (F and Os) applicable to the proposed PCIV extended CTs.

d. The PRA quality assurance program and associated procedures.

e. PRA adequacy, completeness, and applicability with respect to evaluating the plant specific impact of the proposed PCIV extended CT."

[LICENSEE] has confirmed that the plant-specific probabilistic risk assessment (PRA) quality is acceptable for this application in accordance with the guidelines given in RG 1.174. Attachment 7 provides the supporting information. To ensure the applicability of TR NEDC-33046, to [PLANT UNIT NOS.], as required by the condition described above, Attachment 7 provides additional information on PRA quality.

3.2.2 Regulatory Commitment

"The RG 1.177 Tier 3 program ensures that, while the plant is in a limiting condition for operation (LCO) actions condition with an extended CT for restoring an inoperable PCIV to operable status, additional activities will not be performed that could further degrade the capabilities of the plant to respond to a condition the inoperable PCIV or associated system is designed to mitigate and, as a result, increase plant risk beyond that

> determined by the TR analysis. A licensee's implementation of RG 1.177 Tier 3 guidelines generally implies the assessment of risk with respect to CDF. However, the proposed PCIV extended CT impacts containment isolation and, consequently, LERF as well as CDF. Therefore, each licensee requesting extended CTs for PCIVs under TSTF-454, Revision 1, must commit to enhancing its configuration risk management program (CRMP), including those implemented under 10 CFR 50.65(a)(4), the maintenance rule, to include a LERF methodology and assessment. This commitment and the CRMP enhancements must be documented in the licensee's plant-specific application."

In accordance with the model SE, [LICENSEE] hereby makes the above regulatory commitment. [LICENSEE'S] configuration risk management program (CRMP), including those implemented under the maintenance rule of 10 CFR 50.65(a)(4), shall be enhanced to include a LERF methodology and assessment, when the CRMP is used to evaluate inoperable PCIVs.

4.0 ENVIRONMENTAL CONSIDERATION

[LICENSEE] has reviewed the environmental consideration included in the model safety evaluation published on [DATE]([70 FR XXXX]) as part of the CLIIP. [LICENSEE] has concluded that the NRC staff's findings presented in that evaluation are applicable to [PLANT] and the evaluation is hereby incorporated by reference for this application.

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

Enclosure 2

CHANGES TO TS BASES PAGES
(Optional - Bases to be updated per TS Bases Control Program)

Enclosure 3

CONDITION (1)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 1

CONDITION (2)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 2

CONDITION (3)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 3

CONDITION (4)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 4

CONDITION (5)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 5

CONDITION (6)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 6

CONDITION (7)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 7

CONDITION (3)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 3

CONDITION (4)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 4

CONDITION (5)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 5

CONDITION (6)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 6

CONDITION (7)

LICENSEE'S EVALUATION AND THE SUPPORTING INFORMATION

Attachment 7

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