

January 11, 2006

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

SUBJECT: STATUS OF TSTF 439, "ELIMINATE SECOND COMPLETION TIMES LIMITING TIME FROM DISCOVERY OF FAILURE TO MEET AN LCO"

Technical Specification Task Force Traveler (TSTF) 439, Revision 2, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO," dated June 20, 2005, proposed a new technical specification (TS) convention to limit the maximum time allowed for any combination of LCO Conditions that could result in a single continuous failure to meet the LCO. This traveler has been incorporated into Revision 3.1 of the Standard Technical Specifications (STS). The purpose of this letter is to document the Staff's evaluation of the traveler.

Historically, a second Completion Time was included for certain Required Actions to establish a limit on the maximum time allowed for any combination of Conditions that would result in a single continuous failure to meet the LCO. In practice, the addition of second Completion Times did not create an operational restriction because the likelihood of experiencing concurrent failures such that the second Completion Time was limiting is remote. It is important to note that this issue of "flip flopping" between Conditions only applies if the LCO is not met on a continuous basis. In addition, if the LCO requirements are met, even if for an instant, this issue does not occur.

The second Completion Times convention became a problem when the NRC staff received a proposed Traveler that integrated risk-informed Completion Times into specifications containing a second Completion Time. The problem results from extending the second Completion Time by the same amount (i.e., the second Completion Time continued to be the sum of the two Completion Times.) The NRC staff expressed concerns that the extension of the second Completion Time was inappropriate because one of the two Completion Times added to obtain the second Completion Time limit was risk-based and the other was derived in a deterministic evaluation. Eventually, the NRC staff stated it could accept the concept that risk-based and deterministic Completion Times could be added because it judged that the added time would still be conservative.

After the NRC staff accepted adding deterministic and risk-based Completion Times, the TSTF reconsidered its position and decided that the second Completion Times complicated the implementation of risk-informed Completion Times, beyond those that involve second Completion Times. The TSTF concluded that other regulatory requirements, not present when the STS were originally developed, could be used to make a case to eliminate second Completion Times. Therefore, the TSTF proposed a Traveler to delete second Completion Times from the affected specification Required Actions. Additionally, the proposed TSTF changes revised STS Example 1.3-3 by removing the discussion of second Completion Times

and by establishing a convention prohibiting alternating between Conditions in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. Thus, by adopting TSTF-439 there is no specific TS to limit the maximum time allowed for any combination of Conditions that results in a single continuous occurrence of failing to meet the LCO.

Section 1.3 of the STS, Example 1.3-3, described the use of this type of second Completion Time. The STS contained second Completion Times in the following Specifications:

- AC Sources - Operating (BWRs and PWRs)
- Distribution Systems - Operating (BWRs and PWRs)
- Containment Spray and Cooling (PWRs)
- Auxiliary / Emergency Feedwater System (PWRs)
- Standby Liquid Control (SLC) System (BWRs)

The NRC Staff concludes that multiple continuous entries into Conditions, without meeting the LCO, is acceptable because these practices will be controlled by licensee's configuration risk management programs, which were implemented to meet the requirements of the maintenance rule to assess and manage risk, and controlled by the Use and Application convention discussed in Section 1.3 of the Technical Specifications. The TS controls, coupled with the licensees' configuration risk management programs, provide adequate assurance against inappropriate use of combinations of Conditions that result in a single contiguous occurrence of failing to meet the LCO. Accordingly, TSTF 439 has been incorporated into Revision 3.1 of the STS.

Sincerely,

/RA/

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cc: D. Hoffman, Excel Services
B. Mann, Excel Services
M. Crowthers, BWROG
W. Sparkman, WOG
P. Infanger, BWOG
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