

January 13, 2006

TSTF-06-04

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop: T-6 D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Technical Specification Task Force (TSTF) Response to the December 14, 2005
Technical Specification Improvement for Boiling Water Reactor Plants To Risk-
Inform Requirements Regarding Selected Required Action End States Using the
Consolidated Line Item Improvement Process

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject December 14, 2005 Federal Register Notice.

The TSTF is an activity sponsored by the Westinghouse Owners Group and the Boiling Water Reactors Owners Group. The TSTF is the author of the generic change (known as a Traveler) to the Improved Standard Technical Specifications, TSTF-423, Revision 0, "Technical Specifications End States, NEDC-32988-A," that is the subject of the Federal Register Notice.

Should you have any questions, please do not hesitate to contact us.



Wesley Sparkman (WOG/W)



Brian Woods (WOG/CE)



Michael Crowthers (BWROG)



Paul Infanger (WOG/B&W)

Enclosure

cc: Thomas H. Boyce, Technical Specifications Section, NRC
David E. Roth, Technical Specifications Section, NRC



Technical Specification Task Force (TSTF) Response to the
December 14, 2005 Technical Specification Improvement
for Boiling Water Reactor Plants To Risk-Inform Requirements Regarding
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1. We commend the staff for adopting a draft Safety Evaluation format that simplifies the application of the model Safety Evaluation for TSTF-423 to individual licensees. For example, providing blanks for plant name, operating license number, etc. We encourage the staff to follow this example for future CLIIP model Safety Evaluations.
2. The "Applicability" portion of the notice states that each licensee applying for the changes proposed in TSTF-423 should include Bases for the proposed Technical Specifications (TS) consistent with the Bases proposed in TSTF-423. We request that the section be revised to not require licensees to submit Bases changes. The Bases changes in TSTF-423 are not integral to the change and both licensee and NRC resources could be saved by allowing licensees to adopt the necessary Bases changes using the Technical Specifications Bases Control Program. As a precedent, the CLIIP for TSTF-460 (Notice of Availability published in the Federal Register on August 23, 2004) allowed licensees to commit to updating their TS Bases under the TS Bases Control Program instead of requiring licensees to submit their Bases changes for NRC review. We propose that the TSTF-423 CLIIP take a similar approach.
3. Section 1.0 of the model Safety Evaluation, in the first paragraph, states that TSTF-423 was proposed by the Nuclear Energy Institute Risk Informed Technical Specification Task Force. That is incorrect. TSTF-423, Revision 0, was submitted by the Owners Group Technical Specifications Task Force in a letter to the NRC dated August 12, 2003.
4. Section 1.0 of the model Safety Evaluation, the last sentence of section, states, "Short duration repairs are on the order of 2-to-3 days, but not more than a week." We recommend replacing this sentence with the statement from the Implementation Guidance (TSTF-IG-05-02), which states, "A 'short duration' is envisioned to be the duration that boiling water reactors (BWRs) are most physically and practicably able to remain in the hot shutdown condition (i.e., from a few days to approximately one week)." This clarifies that the time frames are a statement of fact rather than a restriction which must be incorporated in plant operating controls.
5. In Section 3.2, "Assessment of TS Changes," of the model Safety Evaluation, each subsection is titled with the applicable Topical Report section number and the ITS LCO number. The abbreviation "TS" is used to indicate the Topical Report section number (e.g., "TS 4.5.1.2 and LCO 3.4.3 (BWR/4); TS 4.5.2.2 and LCO 3.4.4 (BWR/6), Safety/Relief Valves (SRVs)." The labels "4.5.1.2" and "4.5.2.2" are the Topical Report sections associated with these LCO changes. These references also appear in the text of Section 3.2. This presentation is confusing as "TS" is defined in the model Safety Evaluation as "Technical Specifications" and non-ITS plants have Technical Specification requirements with numbers similar to the Topical Report numbers. We recommend replacing this use of the abbreviation "TS" with either "Topical Report section" or defining another acronym, such as "TR."

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6. In Section 3.2.4 of the model Safety Evaluation, in the title and in the first paragraph, the LCO name "Low-Low Set Logic (LLS) Valves" is used. The word "logic" should not appear in the LCO name. The document should be revised to state "Low-Low Set (LLS) Valves."
7. Section 5.0, "Environmental Consideration," of the model Safety Evaluation states that the amendments meet the eligibility criteria for categorical exclusion set forth in "10 CFR 51.22(c)(9) [and (c)(10)]." 10 CFR 51.22(c)(10) pertains to issuance of an amendment pursuant to "parts 30, 31, 32, 33, 34, 35, 36, 39, 40, 50, 60, 61, 70 or part 72 of this chapter which (i) changes surety, insurance and/or indemnity requirements, or (ii) changes recordkeeping, reporting, or administrative procedures or requirements." Paragraph (c)(10) is not applicable to this change and the reference should be deleted.
8. Section 7.0, "References," of the model Safety Evaluation, Reference 1, states the date of NEDC-32988-A, Revision 2, as September 2005. The correct date of the document is December 2002.