

June 13, 2006

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

Dear Members of the TSTF:

The Nuclear Regulatory Commission staff has completed its review of the Technical Specification Task Force Change (TSTF) Traveler, TSTF-468, Revision 0, "Declare Systems Inoperable Due to an Inoperable MCC or Distribution Panel in Lieu of ITS 3.8.9."

TSTF-468 is written requiring a plant configuration risk assessment to determine the acceptability of entering Technical Specification (TS) Required Actions A.2, B.2, and C.2. The risk assessment would be quantified, since it needs to determine the risk category of the plant (green, yellow, orange or red). The risk assessment appears to be similar to what would be required in Risk Management TS Initiative 4b, Risk-Informed Completion Times. In addition, the contents of the TS Required Actions A.2, B.2, and C.2 should explicitly require the risk assessment, since that is a pre-requisite for entry into the Required Actions.

Therefore, since there is neither an adequate risk nor deterministic evaluation, and since reliance on paragraph 10 CFR 50.65(a)(4) of the Maintenance Rule is insufficient, TSTF-468 Revision 0 is unacceptable.

TSTF-468, Revision 0, was discussed at the TSTF meeting held February 23, 2006, and during a conference call held May 25, 2006. Based on the staff's concerns described above, industry representatives agreed to revise TSTF-468. Since a new TSTF would be required to make the needed changes, the staff rejects TSTF-468, Revision 0, and will close-out TAC No. MC4440. A new fee-billable TAC will be open upon receipt of the revised TSTF.

Please contact Bob Clark at (301) 415-2297 or [rlc2@nrc.gov](mailto:rlc2@nrc.gov) if you have any questions or need further information on these comments.

Sincerely,

*/RA/*

Timothy J. Kobetz, Chief  
Technical Specifications Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

cc: P. Infanger, BWOOG  
B. Woods, CEOG  
W. Sparkman, WOG  
D. Hoffman, EXCEL  
B. Mann, EXCEL

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