

TSTF

TECHNICAL SPECIFICATIONS TASK FORCE  
A JOINT OWNERS GROUP ACTIVITY

May 31, 2006

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Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
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SUBJECT: Technical Specification Task Force (TSTF) Response to the May 3, 2006 Federal Register Notice, "Notice of Opportunity To Comment on Model Safety Evaluation and Model License Amendment Request on Technical Specification Improvement Regarding Use of the Improved Bank Position Withdrawal Sequence for General Electric Boiling Water Reactors Using the Consolidated Line Item Improvement Process"

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject May 3, 2006 Federal Register Notice.

The TSTF is an activity sponsored by the Boiling Water Reactor Owners Group and the Pressurized Water Reactors Owners Group. The TSTF is the author of the generic change (known as a Traveler) to the Improved Standard Technical Specifications, TSTF-476, Revision 0, "Improved BPWS Control Rod Insertion Process (NEDO-33091)," 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)

Michael Crowthers (BWROG)

Brian Woods (WOG/CE)

Paul Infanger (WOG/B&W)

Enclosure

cc: Tim Kobetz, Technical Specifications Branch, NRC  
David E. Roth, Technical Specifications Branch, NRC

SUNSI Review Complete

11921 Rockville Pike, Suite 100, Rockville, MD 20852  
Phone: 301-984-4400, Fax: 301-984-7600  
Email: tstf@excelservices.com  
Administered by EXCEL Services Corporation

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cc = T. Bryce (THB)  
Eric Thomas (EXT 1)

Technical Specification Task Force (TSTF) Response to the May 3, 2006 Federal Register Notice, "Notice of Opportunity To Comment on Model Safety Evaluation and Model License Amendment Request on Technical Specification Improvement Regarding Use of the Improved Bank Position Withdrawal Sequence for General Electric Boiling Water Reactors Using the Consolidated Line Item Improvement Process"

General Comments

1. In the Applicability Section of the Notice and the model application, the terms "BWR/4" and "BWR/6" are used incorrectly. These terms should be revised to NUREG-1433 and NUREG-1434, respectively. The changes proposed are applicable to BWR/2-6 plants, if they have adopted the standard banked position withdrawal sequence (BPWS). TSTF-476 proposes changes to the Improved Standard Technical Specifications (ISTS) included in NUREG-1433 and NUREG-1434, which may be applied to any BWR type.
2. The notice, the model application, and the model Safety Evaluation imply that a license amendment is needed for plants with Technical Specifications based on NUREG-1433 to adopt TSTF-476. This is not correct. No license amendment request is required to adopt the proposed Bases changes included in TSTF-476 and no Technical Specification change is needed to adopt TSTF-476 for plants with Technical Specifications based on NUREG-1433. Bases changes are made using the licensee Technical Specification Bases Control Program.
3. In some BWR designs, the rod worth minimizers (RWMs) (e.g., NUMAC) cannot be reprogrammed to accept a new shutdown sequence. The notice should state that bypassing the RWM and entering the plant-specific action equivalent to NUREG-1433 Specification 3.3.2.1, Required Action D.1, for an inoperable RWM during shutdown (which requires the use of a second qualified person to verify rod movement in accordance with BPWS) is acceptable and would not be considered entering a Required Action for "operational convenience" as discussed in the LCO 3.0.2 Bases.
4. The notice should state that the Technical Specifications and Bases changes provided in TSTF-476 completely supersede the proposed Technical Specification changes included in NEDO-33091-A.
5. Throughout the notice, the acronym BPWS is defined incorrectly. The term BPWS stands for "Banked Position Withdrawal Sequence," not "Bank Position Withdrawal Sequence."

Comments on the Model Application and Model Safety Evaluation

1. Cover letter, 1st paragraph – The license amendment request will revise Table 3.3.2.1-1 only. The associated Bases changes will be made by the licensee upon implementation using the Technical Specifications Bases Control Program. This also affects Sections 1 and 2 of Enclosure 1.
2. Cover letter, 3rd paragraph – Many licensees do not provide final Technical Specifications pages with the application. The final pages are provided only after NRC review has determined that no changes from the draft are required. Revised Bases pages are not required to be provided with an application. The Technical Specification Bases

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 (CLIIP)

Control Program requires revised Bases pages to be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

3. Enclosure 1, Section 2.0, Proposed Changes, the first bullet should reference the Bases for Specification 3.1.6, not 3.6.1, if the discussion of specific Bases changes is retained in this section.
4. Enclosure 1, Section 2.0, Proposed Changes, the second bullet should discuss the rod pattern controller, not the rod worth minimizer, if the discussion of specific Bases changes is retained in this section. In addition, both bypassing and reprogramming should be discussed.
5. Enclosure 1, Section 5.1, the last sentence should be deleted. The NRC staff has already determined in the Safety Evaluation for NEDO-33091 for all BWRs that no single failure of the boiling water reactor mechanical or hydraulic system can cause a control rod to drop completely out of the reactor core during the shutdown process. It is unnecessary and a burden with no safety benefit to require individual licensees to verify the statement when it has been generically approved by the NRC for all BWRs.
6. In Enclosure 1, Section 5.1 and in the model Safety Evaluation, Section 3.0, commitment 1 should be deleted. For those plants with Technical Specifications based on NUREG-1434 which will be submitting a license amendment request to adopt TSTF-476, the proposed change to Table 3.3.2.1-1 requires confirming control rod coupling integrity; therefore a separate commitment to do the same is not necessary.
7. Enclosure 1, Section 5.1, and in the model Safety Evaluation, Section 3.0 commitment 2 should be deleted. This "commitment" is a summary of the improved BPWS. The model amendment, the model Safety Evaluation, and the proposed Bases reference the NRC-approved Topical Report as the basis for the improved BPWS sequence. It is unclear what is required by this commitment that is not already required by adoption of the Technical Specifications and Bases. It is unnecessary to develop and track a separate regulatory commitment to do what is already required by the amendment and Topical Report.

Additional Comments on NSHC Determination

1. Description – Amendment requests will only be submitted by licensees with Technical Specifications based on NUREG-1434. Therefore, delete references to NUREG-1433.
2. Description and Criterion 1 – The improved BPWS insertion process applies during reactor shutdowns. Delete the word "normal" before shutdown. The term "normal shutdown" is not used in the model Safety Evaluation or Topical Report. The improved BPWS insertion process applies to all shutdowns as long as the conditions for use are met.

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Selected Required Action End States  
Using the Consolidated Line Item Improvement Process (CLIP)

3. Criterion 2 – Delete the phrase "in the absence of other unrelated failures" from the first sentence. Criterion 2 only evaluates the possibility of a new or different kind of accident related to the proposed change, not other unrelated events.