July 12, 2006 TSTF-06-14

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

SUBJECT: TSTF-497, Revision 0, "Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less"

Dear Sir or Madam:

On December 2, 2004, the TSTF submitted to the NRC TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a." The proposed change revised the Inservice Testing Program located in Chapter 5 of the Improved Standard Technical Specifications (ISTS) to reflect the latest NRC-approved version of the ASME Code. In a letter dated December 6, 2005, the NRC approved TSTF-479 as an administrative change to the ISTS NUREGs. TSTF-479 was incorporated into Revision 3.1 of the ISTS NUREGs.

At the February 23, 2006 meeting between the TSTF and the NRC, the NRC stated that they did not agree with a portion of TSTF-479 and would not approve plant-specific amendments incorporating that portion of TSTF-479.

This Traveler is an administrative change to the ISTS NUREGs to reflect the revised NRC position. We recommend that this Traveler be incorporated into the next revision of the ISTS NUREGs in order for the Improved Standard Technical Specifications to be consistent with the plant-specific Technical Specifications being approved by the NRC.

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

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Enclosure

cc: Tim Kobetz, Technical Specifications Section, NRC
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Technical Specification Task Force
Improved Standard Technical Specifications Change Traveler

Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less

NUREGs Affected: ☑ 1430 ☑ 1431 ☑ 1432 ☑ 1433 ☑ 1434

Classification: 1) Technical Change Recommended for CLIIP?: No

Correction or Improvement: Correction NRC Fee Status:

Benefit: Increase Consistency with Standard or Writer's

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1.0 Description

This Traveler is an administrative change to the ISTS NUREGs to revise paragraph b of the Inservice Testing Program in the ISTS to state, "The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities."

2.0 Proposed Change

NUREG-1430, 1431, and 1432, Specification 5.5.8, and NUREG-1433 and 1434, Specification 5.5.7, both titled "Inservice Testing Proram," paragraph b is revised from:

"The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified in the Inservice Testing Program for performing inservice testing activities."

to

"The provisions of SR 3.0.2 are applicable to the above required Frequencies and <u>to</u> other normal and accelerated Frequencies specified <u>as 2 years or less</u> in the Inservice Testing Program for performing inservice testing activities."

The changes are underlined.

3.0 Background

On December 2, 2004, the TSTF submitted to the NRC TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a." The proposed change revised the Inservice Testing Program located in Chapter 5 of the ISTS to reflect the latest NRC-approved version of the ASME Code. TSTF-479 also revised paragraph b of the Inservice Testing Program to state, "The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified in the Inservice Testing Program for performing inservice testing activities."

In a letter dated December 6, 2005, the NRC approved TSTF-479 as an administrative change to the ISTS NUREGs. TSTF-479 was incorporated into Revision 3.1 of the ISTS NUREGs.

At the February 23, 2006 meeting between the NRC and the TSTF, members of the Component Branch of the NRC stated that TSTF-479 did not provide an adequate justification for applying SR 3.0.2 to Frequencies specified in the Inservice Testing Program as greater than 2 years and the NRC would not approve plant-specific amendments based on TSTF-479 incorporating this change without further justification. The NRC stated that they would accept applying SR 3.0.2 to IST Frequencies not listed in the Inservice Testing Program table provided that those Frequencies are specified in the Inservice Testing Program as 2 years or less.

This Traveler is an administrative change to the ISTS NUREGs to reflect the NRC position. It revises paragraph b of the Inservice Testing Program in the ISTS to state, "The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities."

4.0 Technical Analysis

At the February 23, 2006 meeting between the NRC and the TSTF, members of the Component Branch of the NRC stated that TSTF-479 did not provide an adequate justification for applying SR 3.0.2 to Frequencies specified in the Inservice Testing Program as greater than 2 years and the NRC would not approve plant-specific amendments based on TSTF-479 incorporating this change without further justification. After consideration, the TSTF declined to develop a technical justification for applying SR 3.0.2 to IST Frequencies specified as greater than 2 years at this time due to inadequate cost benefit. Therefore, this Traveler is an administrative change to the ISTS NUREGs which modifies the Inservice Testing Program, paragraph b, to remove the provisions that were not deemed by the NRC to be adequately justified in TSTF-479.

5.0 Regulatory Analysis

This Traveler is considered an administrative change to the ISTS NUREGs. Therefore, a regulatory analysis is not provided.

6.0 Environmental Consideration

This Traveler is considered an administrative change to the ISTS NUREGs. Therefore, an environmental consideration is not provided.

7.0 References

1. TSTF Letter 04-15, "TSTF-479, Revision 0, 'Changes to Reflect Revision of 10 CFR 50.55a'," dated December 2, 2004.

2. Letter from Thomas H. Boyce (NRC) to Technical Specification Task Force, "Status of TSTF 343, 479, 482, 485," dated December 6, 2005.

Revision History

OG Revision 0 Revision Status: Active

Revision Proposed by: TSTF

Revision Description:
Original Issue

TSTF Review Information

TSTF Received Date: 07-Jul-06 Date Distributed for Review 07-Jul-06

OG Review Completed: ☑ BWOG ☑ WOG ☑ CEOG ☑ BWROG

TSTF Comments:
(No Comments)

TSTF Resolution: Approved Date: 12-Jul-06

NRC Review Information

NRC Received Date: 12-Jul-06

Affected Technical Specifications

5.5.8	Inservice Testing Program	NUREG(s)- 1430 1431 1432 Only
5.5.7	Inservice Testing Program	NUREG(s)- 1433 1434 Only

5.5 Programs and Manuals

5.5.8 Inservice Testing Program (continued)

ASME OM Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities,

c. The provisions of SR 3.0.3 are applicable to inservice testing activities, and

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.9 Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging [or repair] of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected, plugged, [or repaired] to confirm that the performance criteria are being met.

5.5 Programs and Manuals

5.5.7 Reactor Coolant Pump Flywheel Inspection Program (continued)

----------REVIEWER'S NOTE----------
The inspection interval and scope for RCP flywheels stated above can be applied to plants that satisfy the requirements in WCAP-15666, "Extension of Reactor Coolant Pump Motor Flywheel Examination."

5.5.8 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:

ASME OM Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities,

c. The provisions of SR 3.0.3 are applicable to inservice testing activities, and

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5 Programs and Manuals

5.5.8 Inservice Testing Program (continued)

ASME OM Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities,

c. The provisions of SR 3.0.3 are applicable to inservice testing activities, and

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.9 Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging [or repair] of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected, plugged, [or repaired] to confirm that the performance criteria are being met.

b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.

5.5 Programs and Manuals

5.5.7 Inservice Testing Program (continued)

a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plans (ASME OM Code) and applicable Addenda as follows:

ASME OM Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities,

c. The provisions of SR 3.0.3 are applicable to inservice testing activities, and

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.8 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in [Regulatory Guide], and in accordance with [Regulatory Guide 1.52, Revision 2, ASME N510-1989, and AG-1].

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < [0.05]% when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [± 10%].

ESF Ventilation System	Flowrate
[ ]	[ ]

5.5 Programs and Manuals

5.5.7 Inservice Testing Program (continued)

ASME OM Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities,

c. The provisions of SR 3.0.3 are applicable to inservice testing activities, and

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.8 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in [Regulatory Guide], and in accordance with [Regulatory Guide 1.52, Revision 2; ASME N510-1989; and AG-1].

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < [0.05]% when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [± 10%]:

ESF Ventilation System	Flowrate
[ ]	[ ]

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < [0.05]% when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [± 10%]: