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TECHNICAL SPECIFICATIONS TASK FORCE
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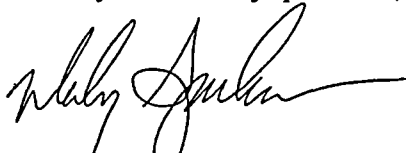
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SUBJECT: Technical Specification Task Force (TSTF) Response to the July 20, 2006 Federal Register Notice, "Technical Specification Improvement for Combustion Engineering Plants to Risk-Inform Requirements Regarding Conditions Leading to Exigent Plant Shutdown Using the Consolidated Line Item Improvement Process"

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject July 20, 2006 Federal Register Notice on TSTF-426, Revision 0, "Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b & 6c."

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



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Enclosure

cc: Tim Kobetz, Technical Specifications Branch, NRC
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E-RIDS = ADM-03

SONSI Review Complete

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Technical Specification Task Force (TSTF) Response to the July 20, 2006 Federal Register Notice, "Technical Specification Improvement for Combustion Engineering Plants to Risk-Inform Requirements Regarding Conditions Leading to Exigent Plant Shutdown Using the Consolidated Line Item Improvement Process"

General Comments and Comments on the Notice for Comment

1. In the Notice under "Applicability," the last two sentences state, "Significant variations from the approach, or inclusion of additional changes to the license, will result in staff rejection of the submittal. Instead, licensees desiring significant variations and/or additional changes should submit a LAR that does not claim to adopt TSTF-426." A similar statement appears at the end of Section 2.2 in the model application. Should a licensee submit an application that requests adoption of TSTF-426 but includes significant variations or additional changes, it would facilitate the NRC's review for the licensee to acknowledge that the change is based on TSTF-426 so that the NRC may use the model Safety Evaluation to the extent possible. We recommend revising the sentence to state, "Instead, licensees desiring significant variations and/or additional changes should submit a LAR that does not request to adopt TSTF-426 under the Consolidated Line Item Improvement Process."
2. The Notice for Comment, Safety Evaluation Sections 3.3, 4.0, and 8.0, and Attachment 4 of the Model Application, refer to WCAP-16446, Revision 0, "Actions to Preclude Entry into LCO 3.0.3 Implementation Guidance (PA-RMCS-0196)," June 2005. The correct reference is WCAP-16446, Revision 1, November 2005.
3. All references to "WCAP-16125-NP" should be "WCAP-16125-NP-A" since the Topical Report as been approved.

Comments on the Model Safety Evaluation

1. In Table 1 and in Section 3.2.9, the Shield Building Exhaust Air Cleanup System is referred to as STS LCO 3.6.13. The correct STS LCO number is 3.6.8.
2. In Section 3.2.1, the discussion refers to two groups of pressurizer heaters. In the STS, the LCO reference is to "[Two groups of] pressurizer heaters." The bracketed phrase indicates a plant-specific design description should be provided. We recommend that Section 3.2.1 and Table 1 be revised to bracket all references to "two" or "both" so that the Safety Evaluation is consistent with the STS change.
3. In Section 3.2.2, under proposed changes, the model Safety Evaluation states, "Revise STS LCO 3.4.11 Condition E (or equivalent) to allow an 8-hour completion time (CT) to restore one PORV for conditions where a PORV is unable to re-close once challenged, but may be isolated. This extension would not apply to PORVs that are leaking, and that cannot be isolated by block valves, or to PORVs that are not expected to be isolable following a demand." Table 1, LCO 3.4.11, under proposed changes, states "Allow 8 hours CT to restore one PORV, for conditions where a PORV is unable to reclose once challenged but may be isolated." This wording is confusing because it is not consistent with the wording in the Condition or the Bases and gives the impression that there are addition restrictions on use of the revised Condition.

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In TSTF-426, the justification states, "The Topical Report refers to 'PORVs that are not expected to be isolable following a demand.' This is equivalent to the TS condition of 'not capable of being manually cycled.' The Topical Report states that the changes to Condition E are not applicable to PORVs that are leaking, and that cannot be isolated by block valves, or to PORVs that are not expected to be isolable following a demand. The LCO Bases state that a leaking PORV is inoperable. Therefore, Actions B or E would apply. Both Actions require closing the associated block valve. If the block valve cannot be closed, an immediate plant shutdown is required. Therefore, the TS enforce the Topical Report conditions that in order to apply the revised Actions, a leaking PORV must be isolated by a block valve and that an inoperable PORV be isolable following a demand." We recommend that the portion of Section 3.2.2 quoted above be revised to state, "Revise STS LCO 3.4.11 Condition E (or equivalent) to allow an 8-hour completion time (CT) to restore one PORV" and Table 1 be revised to delete the phrase "for conditions where a PORV is unable to reclose once challenged but may be isolated" so that the Safety Evaluation is consistent with the revised Technical Specifications.

4. In Section 3.2.4, the model Safety Evaluation states, "STS LCO 3.5.2 Condition D requires that for a condition where the ECCS flow is less than 100% of the ECCS flow assumed in the LOCA analysis. WCAP-16125-NP proposed to delete this condition because it would no longer be necessary, based on the new conditions for two HPSI trains or two LPSI trains inoperable. The NRC staff has concluded that an adequate basis has not been provided to justify the deletion of STS LCO 3.5.2 Condition D. Specifically, licensees should discuss the functions of the HPSI and LPSI systems in terms of reactivity control, RCS inventory control, RCS pressure control, and core heat removal for system operations such as safety injection and recirculation, hot leg injection and once through core cooling to mitigate the consequences of LOCAs, SLB, and SGTR events. The licensees should also discuss the safety and nonsafety related accident mitigation systems, and show that, for a condition when the ECCS flow is less than 100% of the ECCS flow equivalent to a single OPERABLE train, alternative flow injection systems and backup accident management strategies are available and effective. Licensees should also list specific compensatory measures (including a description of pertinent operating procedures, maintenance process and training programs) and contingency plans with acceptable justification for the proposed deletion of STS LCO 3.5.2 Condition D.
Finding: The requested change to increase the time available to restore an LPSI train to operable is acceptable. The proposed change to delete STS LCO 3.5.2 Condition D needs to be adequately justified on a plant-specific basis."

Note that the first quoted sentence is not complete. It appears that it should state "Condition D applies to a condition..." instead of "Condition D requires that for a condition..."

This request for additional justification for the deletion of STS LCO 3.5.2, Condition D, was presented in an NRC Request for Additional Information (See letter from T. R. Tjader (NRC) to Biff Bradley (NEI) dated November 13, 2004) and was addressed by the TSTF (See letter from TSTF to U.S. NRC, TSTF-05-04, dated April 27, 2005). In that

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letter, the TSTF provided the following generic justification for the deletion of Condition D:

"An ECCS train consists of a Low Pressure Safety Injection (LPSI) subsystem and a High Pressure Safety Injection (HPSI) subsystem. In order to provide 100% of the ECCS flow equivalent to a single OPERABLE train, one LPSI subsystem and one HPSI subsystem must be OPERABLE, although they do not have to be powered from the same emergency power bus. Therefore, in order for there to be 100% of the ECCS flow equivalent to a single OPERABLE train, at least one LPSI subsystem and one HPSI subsystem must be OPERABLE.

The request for additional justification in the Staff's Safety Evaluation regarding the elimination of Condition D is unnecessary and inconsistent with other conclusions drawn in the Safety Evaluation. In Section 5.5, the Staff accepted a Completion Time of 24 hours when two LPSI trains are inoperable. In Section 5.6, the Staff accepted a Completion Time of 4 hours for two HPSI trains inoperable. In both these conditions, there will not be 100% ECCS flow equivalent to a single OPERABLE ECCS train. If Condition D is not deleted, the LPSI and HPSI extended Completion Times cannot be used. With the addition of the proposed Conditions B, C, and D, there will be Conditions for one LPSI subsystem, two LPSI subsystems, one HPSI subsystem, and two HPSI subsystems inoperable. Considering the multiple condition entry rules in ITS, existing Condition D becomes redundant and unnecessary as all conditions that could lead to less than 100% of the ECCS flow equivalent to a single ECCS train have been explicitly addressed. This point is made in the TSTF-426 justification, which states:

The existing Condition D, which applies when there is less than 100% of the ECCS flow equivalent to a single OPERABLE train and requires immediate entry into LCO 3.0.3, is eliminated. The conditions which would result in less than 100% ECCS flow equivalent to a single train are addressed by other actions:

- Two LPSI subsystems inoperable and one HPSI subsystem inoperable – Completion Time of 24 hours,
- Two HPSI subsystems inoperable and one LPSI subsystem inoperable – Completion Time of 4 hours, or
- Two HPSI and two LPSI subsystems inoperable – Completion Time of 4 hours."

Therefore, the deterministic and risk evaluations presented in the Westinghouse topical report justify the elimination of Condition D and the Conditions added by TSTF-426

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replace the plant conditions described in Condition D. Additional plant-specific justification is duplicative and unnecessary.

Comments on the Model Application

1. Attachment 3, "Revised Technical Specification Pages," should be shown as optional. Many licensees do not provide retyped technical specification pages in their license amendment requests.
2. We recommend adding the Technical Specifications Branch Chief to the cc: list on the model application as has been done in other CLIIP model applications.
3. Section 2.1 makes three references to a "GE" topical report. This should be revised to refer to a Westinghouse topical report.
4. Section 3.2 states, "In addition, [LICENSEE] has proposed TS Bases consistent with the Westinghouse topical report and TSTF-426, which provide guidance and details on how to implement the new requirements." The Westinghouse topical report does not provide proposed Technical Specification Bases. We recommend revising this sentence to state, "In addition, [LICENSEE] has proposed TS Bases consistent with TSTF-426, which provide guidance and details on how to implement the new requirements."