

TSTF

TECHNICAL SPECIFICATIONS TASK FORCE  
A JOINT OWNERS GROUP ACTIVITY

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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 August 21, 2006 Federal Register Notice, "Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement to Modify Requirements Regarding LCO 3.10.1, Inservice Leak and Hydrostatic Testing Operation Using the Consolidated Line Item Improvement Process"

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject August 21, 2006 Federal Register Notice on TSTF-484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities."

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



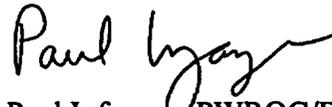
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Enclosure

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ERIDS = ADM-03

SOVSI Review Complete

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Technical Specification Task Force (TSTF) Response to the August 21, 2006 Federal Register Notice, "Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement to Modify Requirements Regarding LCO 3.10.1, Inservice Leak and Hydrostatic Testing Operation Using the Consolidated Line Item Improvement Process"

Comment on the Federal Register Notice for Comment

In various places the Notice describes the requested change as "...would allow control rod scram time testing to be performed concurrently with inservice leak and hydrostatic testing." While this is a true statement, the scope of TSTF-484, Revision 0 also permits the use of LCO 3.10.1 in those situations where the initial reactor coolant temperature for inservice leak and hydrostatic testing is below the [200]°F threshold in the Applicability of LCO 3.10.1, but may exceed it during the performance of this testing. The model Safety Evaluation describes this correctly as, "... would revise LCO 3.10.1, and the associated Bases, to expand its scope to include provisions for temperature excursions greater than [200]°F as a consequence of inservice leak and hydrostatic testing, and as a consequence of scram time testing initiated in conjunction with an inservice leak or hydrostatic test, while considering operational conditions to be in Mode 4."

Comments on the Model Safety Evaluation

1. In Section 2.2, the last sentence in the second paragraph reads, "Both SR must be performed at reactor pressure greater than or equal to [800] psig and prior to initially exceeding 40% rated thermal power (RTP)." We would offer the following re-write for clarity, "Both SRs must be performed at reactor steam dome pressure greater than or equal to [800] psig and prior to ~~initially~~ exceeding 40% rated thermal power (RTP) during startup."
2. In Section 3.0, in the first paragraph, the fourth and fifth statements read, "TSTF-484, Revision 0, Use of TS 3.10.1 for Scram Time Testing Activities, modifies LCO 3.10.1 to allow a licensee to implement LCO 3.10.1 while hydrostatic and leakage testing is being conducted should average reactor coolant temperature exceed [200]°F during testing. The modification will allow completion of testing without the potential for interrupting the test in order to reduce reactor vessel pressure, cool the RCS, and restart the test below [200]°F." We offer the following re-write for completeness with the actual changes being proposed, "TSTF-484, Revision 0, Use of TS 3.10.1 for Scram Time Testing Activities, modifies LCO 3.10.1 to allow a licensee to implement LCO 3.10.1 while hydrostatic and leakage testing and scram time testing are being conducted should average reactor coolant temperature exceed [200]°F during testing. The modification will allow completion of the above testing without the potential for interrupting the testing in order to reduce reactor vessel pressure, cool the RCS, and restart the test below [200]°F."
3. In Section 3.0, the first sentence of the second paragraph, please revise "reactor pressure" to "reactor steam dome pressure" for clarity.

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4. In Section 3.0, second paragraph, second sentence, the acronym RCS has previously been defined in Section 2.1, and need not be re-defined here.
5. In Section 3.0, second paragraph, the sixth sentence reads, "In both situations, scram time testing is resumed during startup prior to exceeding 40% RTP." We offer the following clarification, "In both situations, scram time testing is resumed during startup and is completed prior to exceeding 40% RTP."
6. In Section 3.0, fourth paragraph, we request that the following sentence be added to the end of this paragraph for completeness with the description found in TSTF-484, "These requirements will conservatively limit radiation releases to the environment."