

October 4, 2006

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

Dear Members of the TSTF:

The Nuclear Regulatory Commission has completed the review of the Technical Specification Task Force (TSTF) Change Traveler, TSTF-497, Revision 0, "Limit Inservice Testing Program Application to Frequencies of 2 Years or Less." The staff has approved the proposed change. The staff's Safety Evaluation Report for TSTF-497 is enclosed.

Please contact me at (301) 415-0184 or e-mail [TJK1@nrc.gov](mailto:TJK1@nrc.gov) if you have any questions or need further information on these proposed changes.

Sincerely,

**/RA/**

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

Enclosures: As stated

cc: M. Crowthers (BWROG)  
W. Sparkman (PWROG/W)  
P. Infanger (PWROG/B&W)  
B. Woods (PWROG/CE)  
D. Hoffman (EXCEL)  
B. Mann (EXCEL)

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# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

## TECHNICAL SPECIFICATION TASK FORCE-497, Rev. 0

### “LIMIT OF INSERVICE TESTING PROGRAM APPLICATION TO FREQUENCIES OF 2 YEARS OR LESS”

#### 1.0 INTRODUCTION

By letter dated July 12, 2006, the Technical Specifications Task Force submitted Technical Specification Task Force Change Traveler (TSTF), TSTF-497, R.0, “Limit Inservice Testing Program Application to Frequencies of 2 Years or Less.” Specifically, the proposed revisions to the Standard Technical Specifications (STS) enhance the intention to apply the 25% inservice testing (IST) interval extension for Surveillance Requirement (SR) 3.0.2 to test frequencies of 2 years or less. The proposed revision affects NUREG-1430, 1431 and 1432, Specification 5.5.8; and NUREG-1433 and 1434, Specification 5.5.7, both entitled “Inservice Testing Program.”

#### 2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act (the “Act”) requires applicants for nuclear power plant operating licenses to include TS as part of the license. The TS ensure the operational capability of structures, systems and components that are required to protect the health and safety of the public. The Commission’s regulatory requirements related to the content of the TS are contained in Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36. That regulation requires that the TS include items in the following specific categories: (1) safety limits, limiting safety systems settings, and limiting control settings (50.36(c).(1)); (2) limiting conditions for operation (50.36(c).(2)); (3) surveillance requirements (50.36(c).(3)); (4) design features (50.36(c).(4)); and (5) administrative controls (50.36(c).(5)).

In general, there are two classes of changes to TS: (1) changes needed to reflect modifications to the design basis (TS are derived from the design basis), and (2) voluntary changes to take advantage of the evolution in policy and guidance as to the required content and preferred format of TS over time. This amendment deals with the second class of changes.

In determining the acceptability of revising STS 5.5.8 of NUREG-1430, 1431, and 1432; and STS 5.5.7 of NUREG-1433 and 1434, the staff used the accumulation of generically approved guidance in NUREG-1430, “Standard Technical Specifications, Revision 3.1, Babcock and Wilcox Plants,” dated December 01, 2005; NUREG-1431, Revision 3.1, “Standard Technical Specifications, Westinghouse Plants,” dated December 01, 2005; NUREG-1432, “Standard Technical Specifications, Revision 3.1, Combustion Engineering Plants,” dated December 01, 2005; NUREG-1433, “Standard Technical Specifications, Revision 3.1 General Electric BWR/4 Plants,” dated December 01, 2005; and NUREG-1434, “Standard Technical Specifications, Revision 3.1, General Electric BWR/6 Plants,” dated December 01, 2005.

Licensees may revise the TS to adopt current improved STS format and content provided that plant-specific review supports a finding of continued adequate safety because: (1) the change is editorial, administrative or provides clarification (i.e., no requirements are materially altered); (2) the change is more restrictive than the licensee’s current requirement, or (3) the change is less restrictive than the licensee’s current requirement, but nonetheless still affords adequate assurance of safety when judged against current regulatory standards. The detailed application

of this general framework, and additional specialized guidance, are discussed in Section 3.0 in the context of specific proposed changes.

### 3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the justification for the proposed TSTF as described in the July 12, 2006 submittal. The detailed evaluation below will support the conclusion that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### 3.1 Limit Inservice Testing Program Application to Frequencies of 2 Years or Less

TSTF-479, Rev. 0, "Changes to Reflect Revision of 10 CFR 50.55a," revised the Inservice Testing Program located in Chapter 5 of the STS to reflect the latest approved version of the ASME Code. TSTF-479 also revised paragraph b of the Chapter 5 Inservice Testing Program by adding "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." This requirement referred to the valves in the table above it, which only lists valves with a test frequency interval of 2 years or less. In order to enhance the 2 years or less test frequency requirement, TSTF-497 revised the sentence in paragraph b 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." This is an administrative change to clarify that the provisions of SR 3.0.2 are applicable to valves with IST intervals of 2 years or less.

Based on the requirements of 10 CFR 50.36, 10 CFR 50.59 and IST Program, the staff concludes that the proposed revisions to the STS that enhance the intention to apply the 25% IST interval extension for S R 3.0.2 to test frequencies of 2 years or less is acceptable.

### 4.0 CONCLUSION

The changes proposed by TSTF-497 enhance the intention to apply the 25% IST interval extension for Surveillance Requirement 3.0.2 to test frequencies of 2 years or less. The NRC staff concludes that the proposed changes are consistent with the requirements as contained in 10 CFR 50.36. On this basis, the NRC staff concludes that the changes proposed by TSTF-497 are acceptable.

The NRC staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.