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Add = P. Hearn  
(PCH)

**NRCREP - Comments on the Federal Register Notice for Comment on TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems."**

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**From:** "Brian Mann" <brianm@excelservices.com>  
**To:** <cliip@nrc.gov>  
**Date:** 01/09/2007 12:51 PM  
**Subject:** Comments on the Federal Register Notice for Comment on TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems."  
**CC:** <tjk1@nrc.gov>, <rdt@nrc.gov>, "Peter Hearn" <PCH@nrc.gov>, "TSTF" <TSTF@excelservices.com>, "Tony Browning" <Tony\_Browning@fpl.com>

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The Technical Specifications Task Force (TSTF) offers the following editorial comments on the model Safety Evaluation and model application published in the December 18, 2006 Notice for Comment for TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems." The TSTF will not submit a formal comment letter in response to this Notice for Comment.

Page 75775, Enclosure 3 - "and Bases" should be deleted as plants do not submit retyped Bases pages. The bracketed text below the header indirectly acknowledges this by not referencing Bases pages.

Page 75776, first column, last paragraph, first sentence - the Notice refers to plant-specific Technical Specifications based on the standard technical specifications with the acronym "iSTS." This is a new usage and is confusing. The industry refers to the standard technical specifications (i.e., NUREG-1430 through 1433) as the "ISTS" and in the past the NRC has used the acronym "iSTS" to refer to the standard technical specification NUREGs. We recommend that the acronym not be used in the notice.

Page 75776, 3.0 Technical Evaluation, 1st sentence - "AC" is missing the parentheses - "(AC)".

Page 75776, 3.0 Technical Evaluation, 1st paragraph, 4th sentence - need to define acronym "CR" (Control Room) on first usage.

Page 75776, 3.0 Technical Evaluation, Subsections 3.1 and 3.2 - generic comment with multiple occurrences. The value 90 should be bracketed wherever it appears (i.e., "[90]") when discussing the temperature limit in the Actions. It is a plant-specific, bracketed value in the Traveler.

Page 75776, 3.0 Technical Evaluation, Subsection 3.1, 1st paragraph, 3rd sentence - add a space between "CR" and "AC." It should be "CR AC," not "CRAC."

Page 75777, No Significant Hazards Consideration, Criterion 3. The sentence "Changes to the Bases or license controlled document are performed in accordance with 10 CFR 50.59," is not relevant to the the Criterion discussion and is not accurate (Bases are controlled under the Technical Specifications Bases Control Program.) We recommend that the sentence be deleted and the NRC consider using the No Significant Hazards Consideration discussion provided by the TSTF with TSTF-477.

Should you have any questions regarding these comments, please contact me.

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**Subject:** Comments on the Federal Register Notice for Comment on TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems."

**Creation Date** Tue, Jan 9, 2007 12:50 PM

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