May 3, 2007

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TSTF-431, REVISION 1, "CHANGE IN TECHNICAL SPECIFICATIONS END STATES (BAW-2441)"

Dear Members of the TSTF:

By letter dated November 3, 2006, the Pressurized Water Reactors Owners Group for Babcock and Wilcox Plants (PWROG/B&W) submitted TSTF-431, Revision 1, "Change in Technical Specification End States ". The Nuclear Regulatory Commission (NRC) staff has accepted the submittal for review and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed Request for Additional Information (RAI). A response to these RAIs is requested to be provided within 90 days. Please note that the Reactor Systems Branch is still conducting its review of TSTF-431 with an expected RAI transmittal date of May 25, 2007.

Sincerely,

/RA/
Timothy Kobetz, Chief
Technical Specifications Branch
Division of Inspections & Regional Support
Office of Nuclear Reactor Regulation

Enclosure:
PRA Licencing Branch (APLA) RAI

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OFFICE	ITSB/DIRS	BC:ITSB/DIRS	BC:APLA/DRA	BC:EEEB/DE
NAME	TTjader	TKobetz	MRubin	GAWilson
DATE	4/24/2007	5/3/2007	5/1/2007	4/26/2007

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PRA LICENSING BRANCH (APLA) REQUEST FOR ADDITIONAL INFORMATION
ON TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER
TSTF-431 REV. 1
CHANGE IN TECHNICAL SPECIFICATIONS END STATES (BAW-2441)

1. Question:

Discuss how TSTF-431 implements the condition of approved topical report for LCO 3.4.15 regarding the availability and use of alternative RCS leakage detection capabilities.

Background:

In Section 4.4.4 of the approved topical report BAW-2441-A Rev. 2, the basis for the proposed change affecting Technical Specification (TS) Limiting Condition of Operation (LCO) 3.4.15 Reactor Coolant System (RCS) Leakage Detection, identifies the availability of additional instruments to provide secondary indication of a loss of coolant accident. TSTF-431 Rev. 1 does not address this requirement. LCO 3.4.15 currently includes action requirements (A.1, B.1.1, and B.1.2) to use alternative leakage detection instrumentation and containment sampling until the LCO action is exited, either by restoration of the inoperable leakage detection instruments or by exiting the mode of applicability of the LCO. The proposed change in BAW-2441-A Rev. 2 to establish a Mode 4 endstate identified the availability of the alternative instrumentation as a basis for acceptability. This requirement of the topical report should be implemented in TSTF-431 by revising the TS actions to include a requirement to continue implementing alternative RCS leakage detection actions while the plant remains in Mode 4.

2. Question:

Discuss how TSTF-431 implements the conditions of approved topical report for LCO 3.6.1 regarding the availability of the equipment hatch, air locks, and isolation capability.

Background:

In Section 4.4.6 of BAW-2441-A Rev. 2, for TS LCO 3.6.1 Containment, an “assumed limitation” is identified, which requires that the containment equipment hatch remains closed while remaining in Mode 4. TSTF-431 Rev. 1, does not include this restriction.

Further, in Section 4.4.6 of the topical report, part of the basis for the proposed change is the availability of isolation capability for each containment process line, including the containment air locks. The staff review of the LCO requirements for these components determined that the proposed changes of TSTF-431 do not assure availability of isolation capability for all process lines and the airlocks, while LCO 3.6.1 Action B.2 is in effect in Mode 4, which is inconsistent with the stated basis for the proposed change.

The staff notes that similar changes were proposed and approved in CE-NPSD-1186-A Rev. 0, applicable to Combustion Engineering designed nuclear steam supply systems. The implementation of these changes were per approved TSTF-422-A Rev. 1, which did not apply a Mode 4 end state to LCO 3.6.1. This implementation conservatively assured

that the topical report assumptions regarding the equipment hatch, air locks, and isolation capability were met while operating in Mode 4. As noted in the TSTF, this implementation approach “retains the topical and safety evaluation restrictions on large leakage while providing the approved flexibility for smaller containment leaks.” It is unclear to the staff why the same approach should not apply to TSTF-431.