

3/19/07
72 FR 12845

From: Michael Richardson <mjrm@pge.com>
To: <cliip@nrc.gov>
Date: Fri, Apr 20, 2007 3:48 PM
Subject: Response from "Comment on NRC Documents"

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Michael Richardson (mjrm@pge.com) on Friday, April 20, 2007 at 15:47:22

Document_Title: Notice of Opportunity for Comment on Model Safety Evaluation for Technical Specification Task Force (TSTF) Traveler To Provide Actions for One Steam Supply to Turbine Driven AFW/ EFW Pump Inoperable Using the Consolidated Line Item Improvement Process

Comments: As requested in the Federal Register Notice, dated March 19, 2007 (72 FR 12845 - 12849), the Strategic Teaming and Resource Sharing (STARS) Alliance has the following comment on the model safety evaluation (TSTF-412):

The first sentence in the third paragraph under "STS 3.7.5, Condition C (as Proposed)," in Section 3.0 of the Proposed Model Safety Evaluation states the following:

The STS typically allows a 72 hour Completion Time for Conditions where the remaining operable equipment is able to mitigate postulated accidents without assuming a concurrent single active failure.

Since there are several TSs in the STS that allow a longer Completion time than 72 hours for conditions where the remaining operable equipment is able to mitigate postulated accidents without assuming a concurrent single active failure (such as seven days in TS 3.5.2, 3.6.6, and 3.7.10 in NUREG-1432), STARS recommends that the sentence be changed to the following:

The STS typically allows a 72 hour or longer Completion Time for Conditions where the remaining operable equipment is able to mitigate postulated accidents without assuming a concurrent single active failure.

organization: Strategic Teaming and Resource Sharing (STARS) Alliance

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T.L. Werfa (TLWH)

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Creation Date Fri, Apr 20, 2007 3:47 PM
From: Michael Richardson <mjrm@pge.com>

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