June 13, 2007

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

Dear Members of the TSTF:

By letter dated December 20, 2006, the Technical Specifications Task Force (TSTF), a joint owners group activity, submitted TSTF-498, Revision 0, "Risk-Informed Containment Isolation Valve Completion Times (BAW-2461)," for NRC review. TSTF-498 is proposing to change NUREG 1430, "Standard Technical Specifications Babcock and Wilcox Plants," revision 3.0 to generically extend the Completion Times for containment penetration flow paths with one containment isolation valve inoperable from 4 hours to 7 days for Babcock and Wilcox (B&W) plants.

The staff, in the process of reviewing TSTF-498, finds the need for additional information to complete its review. The request for additional information is in the attachment. The TSTF must notify the NRC, in writing, if it requires longer than 90 days to respond to this request. If the TSTF does not respond in 90 days, and does not request an extension, the NRC will terminate our review of TSTF-498.

If you have any questions please contact Bob Tjader at 310-415-1187 or at trt@nrc.gov.

Sincerely,

***/RA/***

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

cc: See next page

Enclosure:
As stated

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Sincerely,
***/RA/***
Timothy J. Kobetz, Branch Chief
Technical Specifications Branch
Division of Inspection & Regional Support (DIRS/ADRO)
Office of Nuclear Reactor Regulation

cc: See next page

Enclosure:
As stated

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| DATE | 06/13/2007 | 06/13/2007 | 06/13/2007 | 06/13/2007 |

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REQUEST FOR ADDITIONAL INFORMATION REGARDING
TSTF-498, REVISION 0
"RISK-INFORMED CONTAINMENT ISOLATION VALVE COMPLETION TIME," FOR
PRESSURIZED WATER REACTOR OWNERS GROUP (PWROG)
TOPICAL REPORT BAW-2461 ( TAC NO. MD4000)

## 1.0 INTRODUCTION AND BACKGROUND

By letter dated December 20, 2006, the Technical Specifications Task Force (TSTF), a joint owners group activity, submitted TSTF-498, Revision 0, "Risk-Informed Containment Isolation Valve Completion Times (BAW-2461)," for NRC review. TSTF-498 is proposing to change NUREG 1430, "Standard Technical Specifications Babcock and Wilcox Plants," revision 3.0 to generically extend the Completion Times for containment penetration flow paths with one containment isolation valve inoperable from 4 hours to 7 days for participating Babcock and Wilcox (B&W) plants.

Topical report BAW-2461 includes analyses and example technical specification conditions and associated required actions and completion times; shown in Table 2-1 and discussed in Section 2.2.3, "New Conditions For Penetrations With a Closed System" addressing penetration flow paths with only one containment isolation valve and a closed system. BAW-2461 evaluates closed systems in Sections 3.3.10, "Assessment of Risk for Penetrations Connected to a Closed Loop System Inside Containment," and 3.3.11, "Assessment of Risk for Penetrations Connected to Closed Loop Systems Inside Containment that Have an Accident Consequence Limiting System (ACLS) Function," of the topical report. Sections 3.3.10 and 3.3.11 address the failure modes for penetration flow paths that are connected to a closed loop system inside containment. For this category of containment isolation valves (CIVs), the closed loop system is treated as a second CIV for specified failure modes since it is considered a redundant containment isolation barrier by BAW-2461. BAW-2461states that additional TS conditions are added to address this assumption.

As has occurred on some previous Technical Specification Task Force (TSTF) submittals, TSTF-498 does not match the TS conditions proposed by topical report BAW-2461. Specifically, TSTF-498 did not include the proposed conditions shown in Table 2-1 of the topical report that added conditions for penetration flow paths associated with closed systems. These conditions are also identified in Sections 3.3.10 and 3.3.11of the topical report. TSTF-498 did not include the new BAW-2461 TS conditions because, as stated in the TSTF, an inoperable closed system is addressed by other technical specifications, such as the RCS Pressure Boundary Leakage Limiting Conditions for Operation ( LCO) 3.4.13. The staff notes that although LCO 3.4.13 may be appropriate, it is not in agreement with the conditions stated in BAW-2461 and may not be applicable to all the penetration flow path configurations shown in Table 3.3 of BAW-2461.

Enclosure

## 2.0 REQUEST FOR ADDITIONAL INFORMATION

The staff requests responses to the following questions in order to continue the review of TSTF-498:

1. Since TSTF-498 is not in compliance with topical report BAW-2461, either TSTF-498 should be revised to incorporate the conditions/limitations of topical report BAW-2461 and the staff SE, or topical report BAW-2461should be revised to include the proposed change and resubmitted for staff review. Provide justification showing that the topical report results remain acceptable without the specified TS conditions and required actions applied to CIVs associated with a closed system and that the increase in risk continues to be very small.

2. TSTF-498 does not address TS LCO 3.6.3 Note 2 that allows separate condition entry for each penetration flow path. Based on the BAW-2461 staff SE, and previous discussions with the Pressuized Reactor Owners Group (PWROG), TSTF-498 should be revised to address an inoperable CIV in multiple penetration flow paths such that the proposed 7-day CIV completion time (CT) LCO will be limited to no more than one CIV in at any given time.

## 3.0 REFERENCES

1. Letter from the Technical Specification Task Force (TSTF), on: TSTF-498, Revision 0, “Risk-Informed Containment Isolation Valve Completion Times (BAW-2461),” dated December 20, 2006.

2. Letter from the B&W Owners Group, on: Request for Approval of BAW-2461, Revision 0, “Risk-Informed Justification for Containment Isolation Valve Outage Time Change,” dated January 14, 2005.

Technical Specifications Task Force Mailing List

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