

October 2, 2007

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING TSTF
TRAVELER 425, REVISION 1, "RELOCATE SURVEILLANCE FREQUENCIES
TO LICENSEE CONTROL - RITSTF INITIATIVE 5," PROJ 0753,
(TAC No. MD5711)

Dear Members of the TSTF,

By letter (Agencywide Document and Management System (ADAMS) Accession Number ML071150341), dated April 20, 2007, Technical Specifications Task Force (TSTF) requested the Nuclear Regulatory Commission (NRC) to review and approve TSTF Traveler 425, Revision 1, "Relocate Surveillance Frequencies to Licensee Control - RITSTF (Risk Informed TSTF) Initiative 5," under the Consolidated Line Item Improvement Process (CLIIP). The proposed changes would revise standard Technical Specifications for all five plant types to relocate surveillance frequencies to a licensee controlled document and provide an Administrative Control TS in Section 5 for control of these relocated frequencies in accordance with Nuclear Energy Institute (NEI) document NEI 04-10 Rev. 1, "Risk-Informed Method for Control of Surveillance Frequencies."

The NRC's Probabilistic Risk Assessment Licensing Branch has completed its initial review of TSTF-425 Revision 1, and has identified a number of areas where additional information is needed to complete the review. The request for additional information (RAI) is provided in the enclosure to this memorandum. Please note that TSTF-425 is also being reviewed by other branches within the NRC's organization. Additional RAIs, if any, will be later submitted to you according to the TSTF schedule which has been transmitted to you in our June 7, 2007 letter (ADAMS Accession No. ML071560054).

Please direct any questions to Ravi Grover at (301) 415-2297.

Sincerely,

/RA/

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

Enclosure:
RAI

cc: See next page

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11921 Rockville Pike, Suite 100
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REQUEST FOR ADDITIONAL INFORMATION (RAI)

REGARDING TSTF-425, REVISION 1,

“RELOCATE SURVEILLANCE FREQUENCIES TO LICENSEE

CONTROL - RITSTF INITIATIVE 5,” PROJ 0753. (TAC No. MD5711)

By letter (Agencywide Document and Management System (ADAMS) Accession Number ML071150341), dated April 20, 2007, Technical Specifications Task Force (TSTF) requested The Nuclear Regulatory Commission (NRC) review and approve TSTF Traveler 425, Revision 1, “Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5,” under the Consolidated Line Item Improvement Process (CLIP). The NRC has identified the following areas where additional information is needed to complete our review:

1. Surveillance requirements (SR) with frequencies based on reactor core exposures (i.e., effective full power days, cumulative time operating in mode 1, or megawatt-days per ton) will be relocated by TSTF-425 to the Surveillance Frequency Control Program (SFCP). However, the pilot application of NEI 04-10 Rev. 0, did not relocate these types of surveillance frequencies, and NEI 04-10 does not address evaluation of core exposure based tests. Provide a revision to TSTF-425 which retains these core exposure based SRs.

The scope of this comment is for the following SRs:

NUREG-1430:	SR 3.1.2.1			
NUREG-1431:	SR 3.1.2.1	SR 3.2.1.1	SR 3.2.1.2	SR 3.2.2.1
	SR 3.2.3.2	SR 3.2.3.3	SR 3.3.1.3	SR 3.3.1.6
NUREG-1432:	SR 3.1.2.1	SR 3.2.2.1	SR 3.2.3.1	SR 3.2.3.3
NUREG-1433:	SR 3.1.4.2	SR 3.3.1.1.6		
NUREG-1434:	SR 3.1.4.2	SR 3.3.1.1.6		

2. In NUREG-1433 SR 3.8.6.6, and NUREG-1434 SR 3.8.6.6, TSTF-425 will relocate the 12-month and 24-month surveillance frequencies associated with degraded batteries, or batteries exceeding 85 percent of their expected life based on available capacity. This is inconsistent with the proposed changes to similar SRs in NUREG-1430, NUREG-1431, and NUREG-1432, which would only relocate the 60-month frequency associated with non-degraded batteries. The staff considers the specific conditions of battery degradation, age, and capacity as not within the scope of NEI 04-10. Provide a revision to TSTF-425 which retains, in NUREG-1433 and NUREG-1434, the SRs for degraded or old batteries.
3. TSTF-425 proposes to relocate a TS note from NUREG-1433 SR 3.6.1.1.2, which defines the condition for which the increased frequency of testing of drywell to suppression chamber differential pressure decrease. Relocating conditions for the performance of a SR are not within the scope of changes

Enclosure

involving the SFCP, and are not appropriate for inclusion in TSTF-425. Provide a revision to TSTF-425 which retains the note.

4. SR 3.4.14.1 in NUREG-1430, NUREG-1431, and NUREG-1432 are not consistently revised by TSTF-425. In NUREG-1430 the TSTF proposes to retain "In accordance with the Inservice Testing Program," while the in NUREG-1433 and NUREG-1434 these words would be eliminated if the Surveillance Frequency Control Program is applied. The current SR 3.4.14.1 requires testing both in accordance with the Inservice Testing Program and on a time based 18 month interval as well. Provide a revision to TSTF-425 which retains the requirement to perform the SR in accordance with the Inservice Testing Program in NUREG-1431 and NUREG-1432, consistent with the current NUREGs and the proposed change to NUREG-1430.
5. NUREG-1430 SR 3.6.3.5 time-based frequency of 92 days, which is an alternative to the Inservice Testing Program, was not proposed to be relocated, but the same SR in NUREG-1431, NUREG-1432, and SR 3.6.1.3.6 in NUREG-1433 and NUREG-1434, are to be relocated. Provide a revision to TSTF-425 which corrects this inconsistency.
6. NUREG-1431 SR 3.3.1.8, the note prior to the event-specific requirements for SR performance is bracketed. It is not clear why the note is not still needed to support the event-driven test requirements, and should therefore be retained. Provide a revision to TSTF-425 which retains the note.
7. NUREG-1430 SR 3.3.16.2 and 3.3.16.3 - The bracketing does not appear to be correctly implemented by enclosing the existing time-based intervals. Provide a revision to TSTF-425 which corrects the bracketing.
8. Proposed revisions to the standard TS bases for all five documents appropriately eliminates all the specific surveillance frequencies. However, TSTF-425 would also eliminate the unique qualitative basis for each item, replacing this with a generic NEI 04-10 basis statement. The staff does not agree that the plant-specific TS bases for licensees implementing TSTF-425 and NEI 04-10 should not identify the unique qualitative basis for establishing the test frequencies. Revisions to test frequencies under NEI 04-10 would be expected to justify that the revised test frequency still assures the qualitative basis is satisfied. Provide a revision to TSTF-425 which retains the qualitative basis for the SRs in the STS bases.