December 21, 2007

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

SUBJECT: MODEL APPLICATION FOR TSTF-477, ADD ACTION FOR TWO INOPERABLE CONTROL ROOM AC SUBSYSTEMS, REV. 3

Dear Member of the TSTF:

This letter serves to inform you of the NRC staff decision on the use of brackets in TSTF-477, Rev. 3. This was discussed at the November 1, 2007, meeting between NRC staff and the Technical Specifications Task Force (TSTF).

In summary, TSTF-477 allows BWR plants to have a Technical Specification (TS) Condition for two inoperable control room air conditioning subsystems out of service for up to 72 hours provided the control room temperature does not exceed 90°F. Recently, the NRC staff has challenged License Amendment Requests (LARs) requesting to adopt TSTF-477 with maximum temperatures higher than 90°F. The purpose of this letter is to clarify the acceptable temperature limit for TSTF-477 LARs.

The allowances of TSTF-477, Rev. 3 uses the analysis in Topical Report NEDC 31336 PA, "General Electric Instrumentation Setpoint Methodology," and in conjunction with, equipment qualification temperature requirements, justifies 90°F as the maximum allowable ambient temperature when two control room AC units are out of service. A TSTF-477 LAR requesting a higher maximum temperature would require that additional analysis be submitted for NRC staff review. Thus, a licensee submitting this type of request would not benefit by referencing of the standardized safety evaluation for TSTF-477.

Consistent with the NRC staff resolution for comment listed in the final notice of availability, licensees requesting to adopt TSTF-477 using the Consolidated Line Item Improvement Process should request 90°F as the maximum allowable control temperature limit when two control room AC units are out of service. LARs seeking a higher plant-specific maximum control room temperature limit will be processed on a schedule consistent with a plant-specific LAR, outside the CLIIP process.

Sincerely,

Timothy J. Kobetz **/RA/**
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

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