

| | Comment | Example CLIIPs |
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| 1 | The Model Application states, "I declare under penalty of perjury under the laws of the United States of America that I am authorized by [LICENSEE] to make this request and that the foregoing is true and correct." This statement is not consistent with the recommended statement given in RIS 2001-18, "Requirements for Oath or Affirmation." RIS 2001-18 recommends the statement, "I declare [or certify, verify, state] under penalty of perjury that the foregoing is true and correct." Note that RIS 2001-18 states that this statement must be used verbatim. We recommend that the Model Application be revised to be consistent with RIS 2001-18. | TSTF-475 |
| 2 | In the Notice under "Applicability," the last two sentences state, "Significant variations from the approach, or inclusion of additional changes to the license, will result in NRC staff rejection of the submittal. Instead, licensees desiring significant variations and/or additional changes should submit a LAR that does not claim to adopt TSTF-487." Should a licensee submit an application that requests adoption of TSTF-487 but includes significant variations or additional changes (for example, as part of a license amendment request to convert to the Standard Technical Specifications), it would facilitate the NRC's review for the licensee to acknowledge that the change is based on TSTF-487 so that the NRC may use the model Safety Evaluation to the extent possible. We recommend revising the sentence to state, "Instead, licensees desiring significant variations and/or additional changes should submit a LAR that does not request to adopt TSTF-487 under the Consolidated Line Item Improvement Process." | TSTF-448 |
| 3 | To be consistent with 10 CFR 50.91(a), the title of Criterion 2 should be revised to add the word "Accident" before "Previously Evaluated." Specifically, it should state, "The Proposed Change Does Not Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated." | TSTF-475 |
| 4 | Enclosure 3, "Revised Technical Specification Pages," should be shown as optional. Many licensees do not provide retyped technical specification pages in their license amendment requests. | TSTF-427 |
| 5 | The NRC usually rewrites the Determination of No Significant Hazards Consideration (NSHC). The Traveler contains a NSHC that meets the NRC expectations described in RIS 2001-22, "Attributes of a Proposed No Significant Hazards Consideration Determination." The NRC's revised NSHC frequently is not meet those expectations. The NRC should utilize the NHSC provided in the Traveler. | TSTF-475 |
| 6 | The NRC's model application should follow the format of NEI 06-02. | N/A |
| 7 | The model applications frequently request that licensees submit Bases changes even when those Bases changes are not material to the Technical Specification change. The model applications frequently include commitments to revise Bases. Bases are controlled by the licensee under the Technical Specification Bases Control Program. Many licensees provide Bases in amendments for information, but 10 CFR 50.92 does not extend to NRC approval of Bases and commitments to revise Bases are inappropriate. | TSTF-425R1 submittal |