

## ENCLOSURE 3

Technical Specification Task Force  
TSTF-493 Scope Slide Presentation  
Meeting Summary of September 30, 2008 Meeting  
with NRC/TSTF

## TSTF-493 Scope

September 30, 2008

### 10 CFR 50.36(c)(1)(ii)(A)

The CFR clearly identifies two types of LSSS.

"Limiting safety system settings for nuclear reactors are settings for automatic protective devices related to those variables having significant safety functions. Where a limiting safety system setting is specified for a variable on which a safety limit has been placed, the setting must be so chosen that automatic protective action will correct the abnormal situation before a safety limit is exceeded."

## 10 CFR 50.36(c)(1)(i)(A)

"Safety limits for nuclear reactors are limits upon important process variables that are found to be necessary to reasonably protect the integrity of certain of the physical barriers that guard against the uncontrolled release of radioactivity."

3

## Why SL-LSSS

Consistent with the regulations, **TSTF-493 established a new term SL-LSSS**, Trip Setpoints for Functions which provide automatic trips that are directly credited in the analysis to protect against violating the Reactor Core Safety Limits and the Reactor Coolant System (RCS) Pressure Safety Limits during Anticipated Operational Occurrences (AOOs) (TSTF-493 Rev. 3 Justification Document)

4

## SL-LSSS

This phrase was used to differentiate between 10 CFR 50.36(c)(1)(i)(A) Setpoints protecting Reactor Coolant Pressure Boundary and Fuel Boundary and other setpoints that are in the Technical Specifications.

5

## 10 CFR 50.36(c)(1)(i)(A)

Prior to ITS, Safety Limits and Limiting Safety System Settings were identified in Section 2.0 of the Standard Technical Specifications.

- In every case only two Safety Limits are identified, the Reactor Core and Reactor Coolant System Pressure.
- LSSS which protect the Reactor Core and Reactor Coolant System Pressure are the only settings where compliance to 10 CFR 50.36 were ever required.

6

## Analysis

Events with the highest probability of occurrence required the highest level of confidence that the setpoints would function to turn the event and prevent exceeding a Safety Limit. Anticipated Operation Occurrences (AOO) may occur during the life of the reactor and the highest confidence is required to protect the Reactor Core and RCS Pressure Boundaries for these events.

7

## NRC Concurrence

- NRC Technical Specification Branch and I&C Branch agreed with this scope of applicability both in RAIs and in RIS 2006-17, as shown in the following slides.

8

## RAI 104 to TSTF-493 Rev. 1

"... TSTF-493 should document a regulatory basis for differentiating between STS instrument functions identified as limiting safety system settings (LSSs) related to reactor core or reactor coolant pressure boundary safety limits (SLs) from functions not related to SLs."

9

## RAI 113 to TSTF-493 Rev. 1

"TSTF-493 does not develop criteria to ensure that non-SL related LSS functions will meet the 50.36 requirement to be operable and to "function as required" between channel calibrations. The staff has accepted that the criteria for these functions may be in a document other than TS. However, criteria for non-SL LSS should be discussed in the TS bases to ensure the basis for operability for these functions can be discerned from the criteria used for SL-related LSS. This is a completeness issue for development of TSTF-493. Without an appropriate Bases, the NRC staff review of TS changes to non-SL functions will include RAIs asking licensees how operability requirements are met for this class of instrument functions. ... The NRC Staff recommends that non-SL bases discussion should be similar to discussion on notes added to the SL related function."

Note: TSTF-493, Rev. 3 included the recommended Bases discussion for non-SL LSS functions.

10

## NRC REGULATORY ISSUE SUMMARY 2006-17

"10 CFR 50.36(c)(1)(ii)(A) also contains requirements for a general class of LSSSs; LSSSs related to variables having significant safety functions but which do not protect SLs. All plant operating licenses have TSs for LSSSs that are not related to SLs. For these LSSSs, 10 CFR 50.36(c)(1)(ii)(A) also requires that a licensee take appropriate action if it is determined that the automatic safety system does not function as required. Additionally, 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," requires safety-related structures, systems, and components must also perform satisfactorily in service, i.e., the settings must initiate automatic protective actions consistent with the design basis...."

11

## Application of RIS 2006-17

- The RIS correctly acknowledges two classes of LSSS (SL and non-SL) as stated in 50.36.
- 50.36 contains additional requirements for those LSSS that support Safety Limits.
  - Those additional requirements are the two notations in TSTF-493 on SL-LSSS.
- While the RIS correctly acknowledges two classes of LSSS (SL and non-SL), in some cases NRC reviewers have incorrectly applied these additional requirements to non-SL LSSS functions and values.

12

## Why The BWR and PWR NUREG Markups are Different

13

## NUREG Markups

- The TSTF developed the criteria for what is and what is not an SL-LSSS.
- Once agreement was made on the type of Technical Specification change (annotation of functions with Notes), TSTF evaluated the identification of possible TS functions.
  - BWROG proceeded to evaluate the scope of functions that could be a SL-LSSS for any BWR plant
  - Given the number, vintage, and NSSS and analysis differences, the PWROG determined that it would not be possible in the available RIA response time frame to develop a list equivalent to the BWROG's. Rather PWROG identified all trip setpoint in RTS and ESFAS as potential SL-LSSS and each plant would identify those functions in their plant specific analysis that met the criteria.

14

## PWROG

- There was never an expectation that any PWR plant specific implementation of TSTF-493 would apply the notes to all functions in the NUREG markup.

15

## BWROG

- Since the BWR NUREG markups included all the potential SL-LSSS functions it was expected that a BWR plant specific implementation of TST-493 would not apply the notes to all generically identified functions.

16

## Process

- The industry would like to see TSTF-493 processed under CLIP, but we acknowledge that it will not be an ISTB-only review and the 6-month time limit will not apply (similar to TSTF-425).

17

## Summary

- The industry believes that TSTF-493, Rev. 3 appropriately addresses all of the NRC concerns and should be the basis for a Notice for Comment.
- The industry is anxious to bring this issue to quick closure so that licensees can implement a appropriate and consistent solution.

18