ENCLOSURE 4

NRC TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions" Slide Presentation Meeting Summary of September 30, 2008 Meeting with NRC/TSTF

TSTF Meeting

TSTF-493, “Clarify Application of Setpoint Methodology for LSSS Functions”

September 30, 2008

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Staff Problem Statement

- CURRENT STRATEGY BASED ON AUGUST 2003 LT DIRECTIVE
  - Develop TSTF-493 generic solution while processing LARs
    - TSTF would replace ones-sies and two-sies LAR reviews
    - TSTF should save Staff and Industry resources

- OUTCOME
  - TSTF Development Frozen
    - Disagreement on scope of SL-LSSS
      - » PWROGs include all RTS and ESFAS
      - » BWROGs some RTS and ESFAS + Rod Block
  - Action is needed
    - GGNS/Vogtle LARs are cases-in-point
      - Raises questions about intent of plants to adopt the TSTF
    - One'sies and Two'sies LAR approvals consume staff resources
    - De-standardizes Improved STS plants
      - Produces considerable mismatch of TS requirements within the industry
    - Operability will continue to be determined by procedures, not TS for protective devices without the LSSS TS Notes (compliance with 50.36)
    - TSTF-493 adoption is voluntary

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Staff Concerns with BWROG and PWROG TSTF-493

Concern 1: The staff does not understand BWROG and PWROG positions as reflected in TSTF Rev 3 when compared to RIS 2006-17.

Observation: RIS position is that all RPS and ESFAS functions would apply. Implicit in this position is that instrument functions in these LCOs meet 10 CFR 50.36 Criterion 3

> "*Criterion 3*. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier."

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Staff Concerns with BWROG and PWROG TSTF-493

Concern 2: Agreement criteria for deciding operability of instrument functions during channel calibration is not contained in TS.

Observation: TS Allowable Values alone are not sufficient to establish instrument channel operability during surveillance testing

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Problems with Allowable Values as LSSS

Problems

- TS Allowable Values alone are not sufficient to establish instrument channel operability during surveillance testing (i.e., compliance with 50.36(c)(1)(ii)(A) for Limiting Safety System Setting)
  - AVs are not instrument settings.
  - AVs are not limiting settings
    - AVs are the maximum as-found value of an instrument setting beyond which a channel must be declared inoperable.
  - Instrument settings can be found conservative to the AV and be inoperable if …
    - The setting cannot be reset within the as-left tolerance band, or
    - The channel does not behaving as expected

- Outcome
  - Surveillance testing agreement criteria for declaring instrument functions operable are located in **procedures not in tech specs. (**channel setting tolerances, limiting channel trip setpoints, As-found and As- left setpoint tolerances) **,**

Staff Proposal

Proposal #1

- Issue 493 Rev 3N (NRC) for public comment with two options
  - Specify SL-related LSSS instrument functions option
  - Setpoint Control Program option
- Prepare written problem statement and exchange 14 days prior to workshop
- Conduct a workshop; work thru problem statement

Staff Proposal

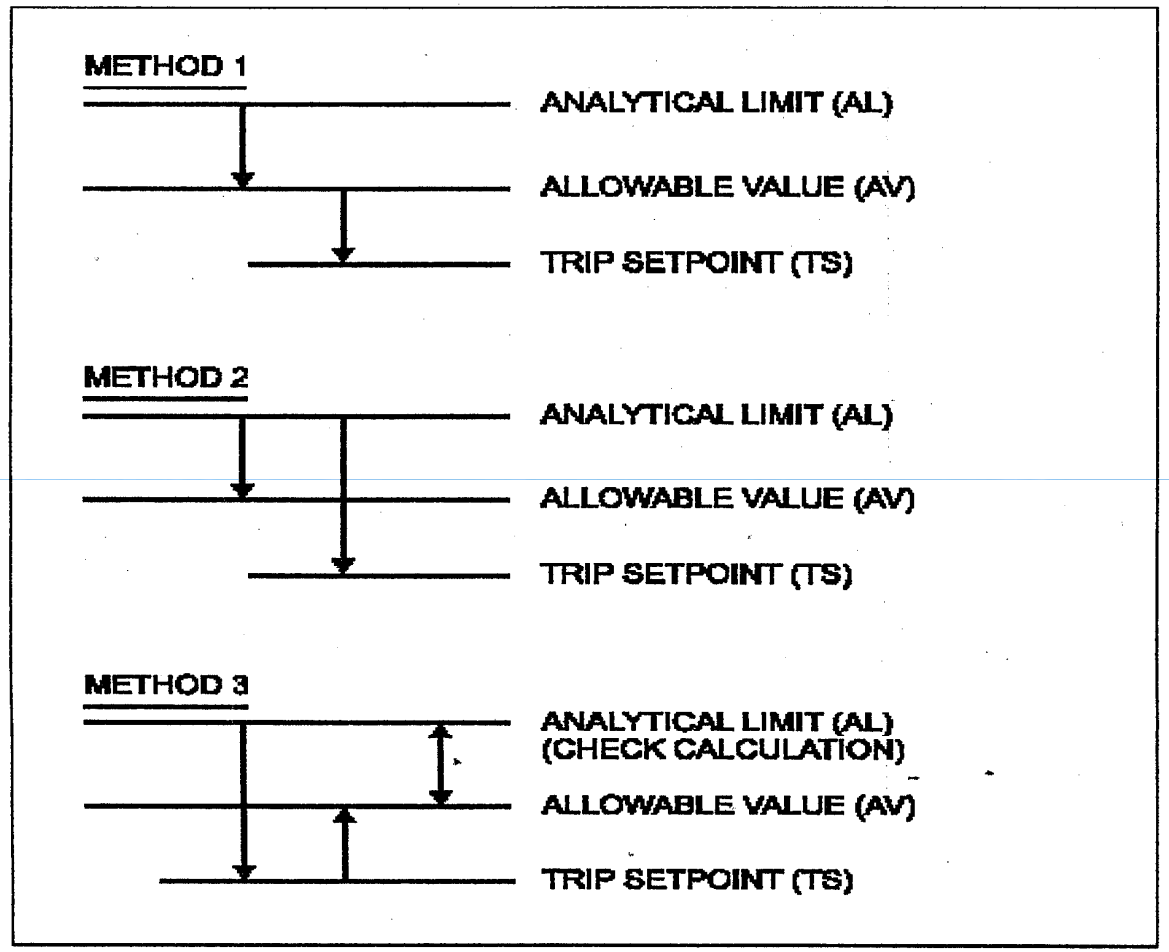
Proposal #2

- Develop list of instruments in question
- Industry provide a problem statement detailing the basis for excluding any instruments
- Conduct a workshop; work through problem statement

Path Forward

Discussion

Background
Setpoint Methodology
ISA 67.04



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Background
Setpoint Methodology
Terminology

TLU = Total Loop Uncertainty
COT = Channel Operational Test
NCOT = Non-COT
AL = Analytical Limit
AV = Allowable Value
AV3 = AV Method 3
NSP = Nominal Setpoint
ST = Setting Tolerance
DL = Deviation Limit

Figure 1: SRTS Parameter Relationship