

From: Brian Mann [brianm@excelservices.com]
Sent: Tuesday, July 21, 2009 2:07 PM
To: Honcharik, Michelle; Elliott, Robert
Cc: tstf@excelservices.com
Subject: RE: TSTF Traveler 400 Letter

Michelle,

The letter on TSTF-400 is confusing. We are happy to discuss it with the technical staff, but please ask them to consider the following information.

The letter states that relocation of the list of EDG trips to the Bases is not appropriate for plants that don't have a Bases Control Program. The letter states, "only plants that have converted to the ITS have Bases Control Programs subject to 10 CFR 50.59." That's not correct. All plants (even those that have not converted to ITS) have adopted a Bases Control Program consistent with the ITS. Therefore, there is no concern.

The letter goes on to state that RG 1.9, Rev. 4, "provides explicit guidance stating that the NRC staff considers testing of EDG critical trips as necessary." Therefore, the NRC staff no longer supports the position reflected in TSTF Traveler 400-A, Revision 1.

That is very confusing because TSTF-400 has nothing to do with testing of critical trips. The ITS does not and never has required testing of EDG trips.

The SR modified by TSTF-400 requires verification that non-critical ED trips are bypassed. This doesn't require verifying that the trips work, only that the trip bypasses work.

The SR originally stated "Verify each DG automatic trip is bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF actuation signal], except: a. Engine Overspeed, b. Generator differential current, [c. Low lube oil pressure, d. High crankcase pressure, and e. Start failure relay.]" The listed functions are the critical DG trips. We wrote TSTF-400 because the SR was confusing, in that it listed the trips that you're not verifying bypassed instead of those that are verifying bypassed. The SR implements RG 1.9 recommendation (all revisions prior to Rev. 4 - it might also be in Rev. 4), "Demonstrate that all automatic diesel generator trips (except engine overspeed, generator differential, and those retained with coincidental logic) are automatically bypassed on an SIAS."

The Staff's comment appears to tie adopting a new requirement (testing of critical trips) to an editorial change to clarify verification of the bypassing of noncritical trips.

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From: Honcharik, Michelle [mailto:Michelle.Honcharik@nrc.gov]
Sent: Tuesday, July 21, 2009 11:10 AM
To: 'brianm@excelservices.com'
Subject: TSTF Traveler 400 Letter

Brian,
Stacey signed out the subject letter yesterday. The pdf is attached.
Michelle

E-mail Properties

Mail Envelope Properties (011501ca0a2d\$fbfdc9c0\$f3f95d40\$)

Subject: RE: TSTF Traveler 400 Letter
Sent Date: 07/21/2009 2:06:52 PM
Received Date: 07/21/2009 2:06:52 PM
From: Brian Mann

Created By: brianm@excelservices.com

Recipients:
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Files	Size	Date & Time
MESSAGE	20460	07/21/2009

Options
Expiration Date:
Priority: oImportanceNormal
ReplyRequested: False
Return Notification: False

Sensitivity: oNormal
Recipients received: