**PROPOSED MODEL APPLICATION FOR PLANT-SPECIFIC ADOPTION OF TSTF-514, REVISION 1, "REVISE BWR OPERABILITY REQUIREMENTS AND ACTIONS FOR RCS LEAKAGE INSTRUMENTATION"**

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

SUBJECT: [PLANT]
DOCKET NO. 50-[XXX]
LICENSE AMENDMENT REQUEST FOR ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-514, REVISION 1, "REVISE BWR OPERABILITY REQUIREMENTS AND ACTIONS FOR RCS LEAKAGE INSTRUMENTATION"

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), [LICENSEE] is submitting a request for an amendment to the Technical Specifications (TS) for [PLANT].

The proposed amendment would revise the TS to define a new time limit for restoring inoperable Reactor Coolant System (RCS) leakage detection instrumentation to operable status; establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable; and make TS Bases changes which reflect the proposed changes and more accurately reflect the contents of the facility design basis related to operability of the RCS leakage detection instrumentation. These changes are consistent with NRC-approved Revision 1 to TSTF Improved Standard Technical Specifications (STS) Change Traveler TSTF-514, "Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation" [Discuss any differences with TSTF-514, Revision 1.] The availability of this TS improvement was announced in the *Federal Register* on [Date] ([ ] FR [ ]) as part of the consolidated line item improvement process (CLIIP).

The proposed amendment also applies alternative RCS leakage monitoring methods which represent a relaxation to current NRC staff TS positions in STS. These leakage monitoring methods apply to the condition of all RCS leakage detection systems inoperable, and allow operation to continue as long as RCS leakage does not increase. Further detailed justification is contained in Attachment 1.

- Attachment 1 provides an evaluation of the proposed changes.
- Attachment 2 provides markup pages of existing TS and TS Bases to show the proposed change.
- Attachment 3 provides revised (clean) TS pages.

[LICENSEE] requests approval of the proposed license amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91(a)(1), "Notice for Public Comment," the analysis about the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is being provided to the Commission.

In accordance with 10 CFR 50.91(b)(1), “Notice for Public Comment; State Consultation,” a copy of this application and its reasoned analysis about no significant hazards considerations is being provided to the designated [STATE] Official.

I declare [or certify, verify, state] under penalty of perjury that the foregoing is correct and true.

Executed on [date] [Signature]

If you should have any questions about this submittal, please contact [NAME, TELEPHONE NUMBER].

Sincerely,

[Name, Title]

Attachments: [As stated or provide list]

cc: [NRR Project Manager]
[Regional Office]
[Resident Inspector]
[State Contact]

**ATTACHMENT 1**
**EVALUATION OF PROPOSED CHANGES**

License Amendment Request for Adoption of TSTF-514, Revision 1, "Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation"

## 1.0 DESCRIPTION

The proposed amendment would revise the Technical Specifications (TS) to define a new time limit for restoring inoperable Reactor Coolant System (RCS) leakage detection instrumentation to operable status; establish alternate methods of monitoring RCS leakage when one or more required monitors are inoperable and make TS Bases changes. These changes are consistent with Technical Specifications Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-514, Revision 1, "Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation." [Minor differences between the proposed plant-specific TS changes, and the changes proposed by TSTF-514 are listed in Section 2.0.] The availability of this TS improvement was announced in the *Federal Register* on [DATE] ([ ] FR [ ]) as part of the consolidated line item improvement process (CLIIP).

## 2.0 PROPOSED CHANGES

TS changes are proposed that will add new Condition [D] to [TS 3.4.6][TS 3.4.7], "[RCS Leakage Detection Instrumentation]." New Condition [D] is applicable when the [primary containment/drywell] atmosphere gaseous radiation monitor is the only operable TS-required instrument monitoring RCS leakage, i.e., TS-required particulate, sump, and [primary containment air cooler condensate flow] monitors are inoperable. New Condition [D] Required Actions require monitoring RCS leakage by obtaining and analyzing grab samples of the [primary containment/drywell] atmosphere every 12 hours; monitoring RCS leakage using administrative means every 12 hours; and taking action to restore monitoring capability using another monitor within 7 days. Existing Condition [F] applies when all required leakage detection systems are inoperable. Condition [F] is revised to require obtaining and analyzing grab samples of the [primary containment/drywell] atmosphere every 6 hours and verifying every 6 hours that RCS leakage has not increased since the required monitors became inoperable. At least one RCS leakage detection monitor must be restored to operable within 72 hours or a plant shutdown is required. Existing Condition [E] applies when the Required Actions and associated Completion Times are not met. It is moved to the last Condition and applies to all the previous Conditions.

Additionally, the TS Bases which summarize the reasons for the specifications, are revised to clarify the specified safety function for each required instrument in Limiting Condition for Operation (LCO) Bases, delete discussion from the TS Bases that could be construed to alter the meaning of TS operability requirements, and revise the TS Bases to reflect the changes made to [TS 3.4.6][TS 3.4.7].

[LICENSEE] is [not] proposing variations or deviations from the TS changes described in TSTF-514, Revision 1, or the NRC staff's model safety evaluation (SE) published in the *Federal Register* on [DATE] ([ ] FR [ ]) as part of the CLIIP Notice of Availability. [Discuss any

differences with TSTF-514, Revision 1 and the effect of any changes on the NRC staff model SE].

## 3.0 BACKGROUND

NRC Information Notice (IN) 2005-24, "Nonconservatism in Leakage Detection Sensitivity," informed addressees that the reactor coolant activity assumptions for primary containment atmosphere gaseous radioactivity monitors may be nonconservative. This means the monitors may not be able to detect a one gallon-per-minute (gpm) leak within one hour. Some licensees have taken action in response to IN 2005-24 to remove the gaseous radioactivity monitor from the TS list of required monitors. However, industry experience has shown that the primary containment atmosphere gaseous radiation monitor is often the first monitor to indicate an increase in RCS leak rate. As a result, the TSTF and the NRC staff met to develop an alternative approach to address the issue identified in IN 2005-24. The agreed solution is to retain the primary containment atmosphere gaseous radiation monitor in the LCO list of required equipment, to revise the Actions to require additional monitoring, and to provide less time before a plant shutdown is required when the primary containment atmosphere gaseous radiation monitor is the only operable monitor.

## 4.0 TECHNICAL ANALYSIS

The proposed amendment adds new Condition [D], which is a more restrictive TS requirement. The change is more restrictive because the time allowed to restore the inoperable monitoring systems is more conservative than the current [TS 3.4.6][TS 3.4.7]. New Condition [D] requires analyzing grab samples of the [primary containment/drywell] atmosphere every 12 hours, monitoring RCS leakage by administrative means every 12 hours and restoring [either the [primary containment/drywell] air cooler condensate flow rate monitoring system or the drywell floor drain sump monitoring system] to Operable status within 7 days (as opposed to 30 days allowed in Condition A). The use of administrative means of monitoring RCS leakage includes trending parameters that may indicate an increase in RCS leakage.

The administrative means of monitoring includes diverse alternative mechanisms from which appropriate indicators may be selected based on plant conditions. [Licensee] will utilize the following method or methods considering the current plant conditions and historical or expected sources of unidentified leakage: [[primary containment/drywell] pressure, [primary containment/drywell] temperature, [primary containment/drywell] humidity, component cooling water system outlet temperatures, component cooling water system makeup, reactor recirculation system pump seal pressure and temperature, reactor recirculation system pump motor cooler temperatures, [primary containment/drywell] cooling fan outlet temperatures, reactor building chiller amperage, control rod drive system flange temperatures, and/or safety relief valve tailpipe temperature, flow and pressure].

These, indications, coupled with [primary containment/drywell] atmospheric grab samples, are sufficient to alert the operating staff to an unexpected increase in unidentified leakage. A [primary containment/drywell] grab sample is comparable to the atmospheric particulate radiation monitor with respect to the ability to detect RCS leakage. [Primary containment/drywell] grab samples are not a continuous monitoring method. However, the frequent performance of the grab samples ensures there is no significant loss of monitoring

capability during the Required Action Completion Time. The 7-day Completion Time to restore another monitor to Operable status is reasonable given the diverse methods employed in the Required Actions to detect an RCS leak and the low probability of a large RCS leak during this period.

The proposed amendment contains a less restrictive TS change to existing Condition [F]. The proposed Required Actions for Condition [F] would eliminate the requirement to immediately enter LCO 3.0.3 and would add the requirement to analyze grab samples of the [primary containment/drywell] atmosphere every 6 hours, verify no increase in RCS leakage (over the last quantified RCS leakage value determined prior to the monitors becoming inoperable) every 6 hours, and restore at least one RCS leakage detection monitor to operable status within 72 hours. The less restrictive change is justified because a diverse set of available instruments are sensitive to increases in RCS leakage and an increase in RCS leakage indicated by a change in instrument values established prior to the monitors becoming inoperable would require a plant shutdown.

There are diverse alternative methods for determining that RCS leakage has not increased, from which appropriate indicators may be selected based on plant conditions. [LICENSEE] will utilize the following method or methods considering the current plant conditions and historical or expected sources of unidentified leakage: [[primary containment/drywell] pressure, [primary containment/drywell] temperature, [primary containment/drywell] humidity, component cooling water system outlet temperatures, component cooling water system makeup, reactor recirculation system pump seal pressure and temperature, reactor recirculation system pump motor cooler temperatures, [primary containment/drywell] cooling fan outlet temperatures, reactor building chiller amperage, control rod drive system flange temperatures, and/or safety relief valve tailpipe temperature, flow and pressure]. Actions to verify that these indications have not increased since the required monitors became inoperable and analyze [primary containment/drywell] atmospheric grab samples are sufficient to alert the operating staff to an unexpected increase in RCS leakage.

The combination of these frequent actions provides reasonable assurance that any significant RCS pressure boundary degradation would be detected soon after leak occurrence, therefore minimizing the potential for subsequent growth propagation to a gross failure. Providing a limited Completion Time to restore at least one RCS leakage monitor may avoid an unnecessary plant shutdown when there is minimal impact on safety with no Operable RCS leakage monitoring instrumentation.

{NOTE: Discuss how the plant licensing basis meets General Design Criterion 30 and cite applicable FSAR chapter/section.}

[LICENSEE] has reviewed the model SE published in the *Federal Register* on [DATE] ([ ] FR [ ]) as part of the CLIIP Notice of Availability. [LICENSEE] has concluded that the technical justifications presented in the SE prepared by the NRC staff are applicable to [PLANT].

## 5.0 REGULATORY SAFETY ANALYSIS

### 5.1 NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

[LICENSEE] has evaluated the proposed changes to the TS using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration.

Description of Amendment Request: The proposed amendment would revise [TS 3.4.6][TS 3.4.7], "[RCS Leakage Detection Instrumentation]" Conditions and Required Actions as well as make associated TS Bases changes for [TS 3.4.6][TS 3.4.7].

Basis for proposed no significant hazards determination: As required by 10 CFR 50.91(a), the [LICENSEE] analysis of the issue of no significant hazards consideration is presented below:

1: Does the Proposed Change Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated?

Response: No

The proposed change clarifies the operability requirements for the RCS leakage detection instrumentation and reduces the time allowed for the plant to operate when the only TS-required operable RCS leakage detection instrumentation monitor is the primary containment/drywell atmospheric gaseous radiation monitor. The proposed change also extends the allowed operating time when all RCS leakage detection instrumentation is inoperable. The monitoring of RCS leakage is not a precursor to any accident previously evaluated. The monitoring of RCS leakage is not used to mitigate the consequences of any accident previously evaluated. Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2: Does the Proposed Change Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated?

Response: No

The proposed change clarifies the operability requirements for the RCS leakage detection instrumentation and reduces the time allowed for the plant to operate when the only TS-required operable RCS leakage detection instrumentation monitor is the primary containment/drywell atmospheric gaseous radiation monitor. The proposed change also extends the allowed operating time when all RCS leakage detection instrumentation is inoperable. The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Therefore, it is concluded that the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3: Does the Proposed Change Involve a Significant Reduction in a Margin of Safety?

Response: No

{Note: Discuss how the plant licensing basis meets General Design Criterion 30 and cite applicable FSAR chapter/section.}

The proposed change clarifies the operability requirements for the RCS leakage detection instrumentation and reduces the time allowed for the plant to operate when the only TS-required operable RCS leakage detection instrumentation monitor is the primary containment/drywell atmospheric gaseous radiation monitor. The proposed change also extends the allowed operating time when all RCS leakage detection instrumentation is inoperable. Reducing the amount of time the plant is allowed to operate with only the primary containment/drywell atmospheric gaseous radiation monitor operable increases the margin of safety by increasing the likelihood that an increase in RCS leakage will be detected before it potentially results in gross failure. Allowing a limited period of time to restore at least one RCS leakage monitoring instrument to operable status before requiring a plant shutdown avoids putting the plant through an unnecessary thermal transient when other instrumentation is available to provide indication of changes in RCS leakage. Therefore, it is concluded that the proposed change does not involve a significant reduction in a margin of safety.

5.2 APPLICABLE REGULATORY REQUIREMENTS/CRITERIA

A description of the proposed TS change and its relationship to applicable regulatory requirements were published in the *Federal Register* Notice of Availability on [DATE] ([ ] FR [ ]). [LICENSEE] has reviewed the NRC staff's model SE referenced in the CLIIP Notice of Availability and concluded that the regulatory evaluation section is applicable to [PLANT].

## 6.0 ENVIRONMENTAL CONSIDERATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20, and would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

## 7.0 REFERENCES

{NOTE: Provide list of references.}

**PROPOSED MODEL SAFETY EVALUATION FOR PLANT-SPECIFIC ADOPTION OF TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-514, REVISION 1, "REVISE BWR OPERABILITY REQUIREMENTS AND ACTIONS FOR RCS LEAKAGE INSTRUMENTATION"**

## 1.0 INTRODUCTION

By application dated [DATE], [LICENSEE] (the licensee) proposed changes to the Technical Specifications (TS) for [PLANT]. The proposed changes revise [TS 3.4.6][TS 3.4.7], "[RCS Leakage Detection Instrumentation]," and includes TS Bases changes that summarize the purpose of the TS.

The licensee stated that the license amendment request (LAR) is consistent with NRC-approved Revision 1 to Technical Specifications Task Force (TSTF) Standard Technical Specifications (STS) Change Traveler TSTF-514, "Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation." [Discuss any differences with TSTF-514, Revision 1.] The availability of this TS improvement was announced in the *Federal Register* on [DATE] ([ ] FR [ ]) as part of the consolidated line item improvement process (CLIIP).

## 2.0 REGULATORY EVALUATION

{REVIEWER'S NOTE: Explain the current licensing basis and how the licensee meets General Design Criterion 30 from the plant-specific information in the FSAR or alternative preliminary design criterion (PDC) in the FSAR.}

The regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix A, General Design Criterion (GDC) 30 "Quality of Reactor Coolant Pressure Boundary," requires means for detecting and, to the extent practical, identifying the location of the source of RCS Leakage. Regulatory Guide (RG) 1.45, Revision 0, "Reactor Coolant Pressure Boundary Leakage Detection Systems," May 1973, describes acceptable methods of implementing the GDC 30 requirements with regard to the selection of leakage detection systems for the Reactor Coolant Pressure Boundary (RCPB). Regulatory Guide 1.45, Revision 1, "Guidance on Monitoring and Responding to Reactor Coolant System Leakage," was issued in May 2008. RG 1.45, Revision 1, describes methods for implementing the GDC 30 requirements that are different from those in RG 1.45, Revision 0, and was intended to be applicable only to new reactors.

RG 1.45, Revision 0, Regulatory Position C.2, states that "Leakage to the primary reactor containment from unidentified sources should be collected and the flow rate monitored with an accuracy of one gallon-per-minute (gpm) or better."

RG 1.45, Revision 0, Regulatory Position C.3 states,

> At least three separate detection methods should be employed and two of these methods should be (1) sump level and flow monitoring and (2) airborne particulate

radioactivity monitoring. The third method may be selected from the following: (a) monitoring of condensate flow rate from air coolers or (b) monitoring of airborne gaseous radioactivity. Humidity, temperature, or pressure monitoring of the containment atmosphere should be considered as alarms or indirect indication of leakage to the containment.

RG 1.45, Revision 0, Regulatory Position C.5 states, "The sensitivity and response time of each leakage detection system in regulatory position 3 above employed for unidentified leakage should be adequate to detect a leakage rate, or its equivalent, of one gpm in less than one hour." RG 1.45, Revision 0, states, "In analyzing the sensitivity of leak detection systems using airborne particulate or gaseous radioactivity, a realistic primary coolant radioactivity concentration assumption should be used. The expected values used in the plant environmental report would be acceptable." The appropriate sensitivity of a plant's primary containment/drywell atmosphere gaseous radioactivity monitors is dependent on the design assumptions and the plant-specific licensing basis as described in the [PLANT] final safety analysis report (FSAR).

As stated in NRC Information Notice (IN) 2005-24, "Nonconservatism in Leakage Detection Sensitivity," the reactor coolant activity assumptions for primary containment/drywell atmosphere gaseous radioactivity monitors may be nonconservative. This means the monitors may not be able to detect a one gpm leak within one hour under all likely operating conditions.

The NRC's regulatory requirements related to the content of the TS are contained in 10 CFR 50.36. Paragraph (c)(2)(ii) of 10 CFR 50.36 lists four criteria for determining whether particular items are required to be included in the TS LCOs. Criterion 1 applies to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the RCPB. As described in the *Federal Register* notice associated with this regulation (60 FR 36953, July 16, 1995), the scope of TS includes two general classes of technical matters: (1) those related to prevention of accidents, and (2) those related to mitigation of the consequences of accidents. Criteria 1 addresses systems and process variables that alert the operator to a situation when accident initiation is more likely, and supports the first of these two general classes of technical matters which are included in TS.

The NRC's guidance for the format and content of Boiling Water Reactor (BWR) TS can be found in [NUREG-1433, Revision 3.0, "Standard Technical Specifications General Electric Plants, BWR/4."][NUREG-1434, Revision 3.0, "Standard Technical Specifications General Electric Plants, BWR/6."] STS [3.4.6, "RCS Leakage Detection Instrumentation" in NUREG-1433][3.4.7, "RCS Leakage Detection Instrumentation" in NUREG-1434] contains the guidance specific to the RCS leakage detection instrumentation for BWRs.

The Bases for STS [3.4.6 contained in NUREG-1433, Revision 3.0][3.4.7 contained in NUREG-1434, Revision 3.0], provide background information, the applicable safety analyses, a description of the LCO, and the applicability for the RCS leakage detection instrumentation TS. The TS Bases provide the purpose or reason for the TS which are derived from the analyses and evaluation included in the safety analysis report. Specifically, RCS leakage detection instrumentation design assumptions and licensing basis for the plant. The issue described in IN 2005-24 has raised questions regarding operability requirements for primary containment/drywell atmosphere gaseous radioactivity monitors. TSTF-514, Revision 1, revises the TS Bases to summarize the proposed TS changes and more accurately describe the

contents of the facility design basis related to operability of the RCS leakage detection instrumentation. In addition, TSTF-514, Revision 1, includes revisions to TS Actions for RCS leakage detection instrumentation to establish limits for operation in condition of reduced monitoring sensitivity because of inoperable gaseous radioactivity instrumentation and more appropriate actions when all RCS leakage detection instrumentation is inoperable.

## 3.0 TECHNICAL EVALUATION

In adopting the changes to TS included in TSTF-514, Revision 1, the licensee proposed to revise TS [3.4.6][3.4.7], "[RCS Leakage Detection Instrumentation]" Conditions and Required Actions. The licensee proposed adding new Condition [D] to TS [3.4.6][3.4.7]. New Condition [D] would be applicable when the [primary containment/drywell] atmosphere gaseous radiation monitor is the only operable RCS leakage detection monitor. The proposed Required Actions for new Condition [D] require the licensee to analyze grab samples of the [primary containment/drywell] atmosphere once per 12 hours, restore [either the [primary containment/drywell] air cooler condensate flow rate monitoring system or the required drywell floor drain sump monitoring system] to Operable status within 7 days, and monitor RCS leakage by administrative means once per 12 hours.

Administrative means of monitoring RCS leakage includes trending parameters that may indicate an increase in RCS leakage. There are diverse alternative methods from which appropriate indicators for identifying RCS leakage may be selected based on plant conditions. [LICENSEE] will utilize the following method or methods considering the current plant conditions and historical or expected sources of unidentified leakage, as their TS administrative means: [[primary containment/drywell] pressure, [primary containment/drywell] temperature, [primary containment/drywell] humidity, component cooling water system outlet temperatures, component cooling water system makeup, reactor recirculation system pump seal pressure and temperature, reactor recirculation system pump motor cooler temperatures, [primary containment/drywell] cooling fan outlet temperatures, reactor building chiller amperage, control rod drive system flange temperatures, and/or safety relief valve tailpipe temperature, flow and pressure].

The NRC staff determined that the proposed Condition [D] is more restrictive than the current requirement, because there is no current TS Condition for the plant condition of the [primary containment/drywell] atmosphere gaseous radioactivity monitor being the only operable RCS leakage detection monitor. The associated proposed Actions and Completion Times are adequate because monitoring the RCS by administrative means, coupled with [primary containment/drywell] atmospheric grab samples, are sufficient to alert the operating staff to an unexpected increase in unidentified leakage. The [primary containment/drywell] atmospheric grab samples are comparable to the atmospheric particulate radiation monitor with respect to the ability to detect RCS leakage. However, taking frequent grab samples will ensure there is no significant loss of monitoring capability during the Required Action Completion Time. The 12-hour interval is reasonable given the availability of the [primary containment/drywell] atmospheric gaseous radiation monitor. Allowing 7 days to restore another RCS leakage monitor to operable status is reasonable given the diverse methods employed in the Required Actions to detect an RCS leak and the low probability of a large RCS leak during this period. Proposed Condition [D] is conservative relative to the STS, sufficiently alerts the operating staff, provides a comparable ability to detect RCS leakage, and provides time intervals that are

reasonable. Therefore, the NRC staff determined that proposed Condition [D] provides an adequate assurance of safety when judged against current regulatory standards.

Existing TS [3.4.6][3.4.7] Condition [F] is applicable when all required RCS leakage detection systems are inoperable. The current Required Action for Condition [F] is to immediately enter LCO 3.0.3. The licensee proposed modifying the Required Actions for Condition [F]. The proposed Required Actions for Condition [F] would eliminate the requirement to immediately enter LCO 3.0.3 and would add the requirement to analyze grab samples of the [primary containment/drywell] atmosphere once per 6 hours, verify no increase in RCS leakage over the last quantified RCS leakage value determined prior to the monitors becoming inoperable and restore at least one RCS leakage detection monitor to Operable status within 72 hours. Administrative means of monitoring RCS leakage will be used to verify there is no increase (over the last quantified RCS leakage value determined prior to the monitors becoming inoperable) in RCS leakage. The [LICENSEE] will utilize the diverse alternative methods described under New Condition [D] above, as their TS administrative means, to verify no increase in RCS leakage.

The NRC staff determined that the proposed Condition [F] is less restrictive than the current requirement because it would allow a longer time to operate when all required RCS leakage detection monitors are inoperable. Providing a limited Completion Time to restore at least one RCS leakage monitor may avoid a plant shutdown when a plant discovers all RCS leakage monitoring instrumentation is inoperable. The proposed 72-hour Completion Time for Restoration of at least one RCS leakage detection monitor to operable status is appropriate given the low probability of significant RCS leakage during the time when no required RCS leakage detection monitors are operable, the availability of alternative instruments and methods to monitor changes in RCS leakage, and the requirement to shut down the plant in the event the alternative instruments or methods indicate an increase in RCS leakage. Verifying that RCS leakage has not increased since the required monitors became inoperable, coupled with [primary containment/drywell] atmospheric grab sampling frequency, is sufficient to alert the operating staff to an unexpected increase in RCS leakage. The combination of these frequent actions provides reasonable assurance that any significant RCPB degradation would be detected soon after leak occurrence, therefore minimizing the potential for subsequent crack propagation to a gross failure. Therefore, the NRC staff determined that proposed Condition [F] provides an adequate assurance of safety when judged against current regulatory standards.

The licensee proposed minor changes to ensure continuity of the [PLANT] TS format. These changes re-lettered current Condition [D] which applies when the drywell floor drain sump monitoring system is the only operable RCS leakage detection instrument, to Condition [E], and current Condition [E], which applies when the required action and the associated Completion Time are not satisfied, to Condition [G]. Similar changes were made to the associated Required Actions. The NRC staff determined that these changes were editorial, and therefore acceptable.

In adopting TSTF-514, Revision 1, the licensee proposed changes that would revise the Bases for TS [3.4.6][3.4.7] to reflect the proposed TS changes and more accurately describe the contents of the facility design basis related to operability of the RCS leakage detection instrumentation and reflect the proposed TS changes. The regulation at 10 CFR 50.36(a)(1) requires a summary statement of the TS Bases or reasons for such Specifications be included with the application. The proposed TS Bases changes related to operability of the RCS leakage

detection instrumentation are acceptable because they provide background information, the applicable safety analyses, a description of the limiting condition for operation, and the applicability for the RCS leakage detection instrumentation TS and are consistent with the design basis of the facility. These instruments satisfy Criterion 1 of 10 CFR 50.36(c)(2)(ii) in that they are installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the RCPB.

The NRC staff evaluated the licensee's proposed change against the applicable regulatory requirements listed in Section 2 of this SE. The NRC staff also compared the proposed change to the change made to STS by TSTF-514, Revision 1. The NRC staff determined that all the proposed changes afford adequate assurance of safety when judged against current regulatory standards. Therefore, the NRC staff finds the proposed changes acceptable.

## 4.0 CONCLUSIONS

{REVIEWER'S NOTE: Provide conclusion.}

## 5.0 STATE CONSULTATION

{REVIEWER'S NOTE: Provide State consultation paragraph.}

## 6.0 ENVIRONMENTAL CONSIDERATION

{REVIEWER'S NOTE: Provide environmental consideration.}

## 7.0 REFERENCES

{REVIEWER'S NOTE: Provide list of references.}