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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

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U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: **Comments on Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specification Task Force Traveler-493, Revision 4, "Clarification of Setpoint Methodology for LSSS Functions"**

The U.S. Nuclear Regulatory Commission (NRC) published the Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specification Task Force Traveler-493, Revision 4, "Clarification of Setpoint Methodology for LSSS Functions" for public comment in the Federal Register on November 10, 2009 (74 FR 58065-58067). The Tennessee Valley Authority provides the comments identified in the enclosure for the NRC's consideration.

If you have any questions or need additional information regarding this matter, please contact Rob Brown at (423) 751-7228.

Respectfully,

for R. M. Krich
Vice President
Nuclear Licensing

Enclosure: Tennessee Valley Authority's Comments on the NRC's Proposed Model Safety Evaluation for Plant-Specific Adoption of TSTF-493, Revision 4

SUNSI Review Complete
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ENCLOSURE

Comments on Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specification Task Force Traveler (TSTF)-493, Revision 4, "Clarification of Setpoint Methodology for LSSS Functions"

The following comments are associated with the NRC Proposed Model Application, Model No Significant Hazards Consideration Determination, and Model Safety Evaluation for adoption of TSTF-493, Revision 4, obtained from the NRC Agency-wide Documents Access and Management System (Accession Number ML092150990).

LOCATION	COMMENTS
Page 3 Applicability (2nd sentence)	Statement: "The Traveler revises the TS instrument function values related to those variables that have a significant safety function." Implementation of the TSTF does not necessarily require changes in "values" as stated above. In some situations, implementation may only require the addition of notes and basis changes. This sentence should be reworded to cover all options. A new term, "significant safety function," is introduced, but is not defined in 10 CFR 50.36. "Significant safety function" needs to be defined because it is used to select the functions listed in Attachment A of the TSTF.
Page 4 Adoption of TSTF Traveler-493, Option A with Changes to Setpoint Values (2nd bullet)	Statement: "If multiple similar setpoints are proposed to be revised, a summary calculation for each type of setpoint being changed may be provided . . ." The meaning of different types of setpoints is unclear. This may have been intended to mean different applications or different methodologies. Clarify what is meant by "type."
Page 20 (last paragraph)	The wording in this paragraph is not consistent with the initial Industry Concept 7 on page 27 concerning a setpoint found outside of the As Found condition and also not consistent with the wording provided on Page 37, bullet 3. In addition, the description of the evaluation of channel performance is not consistent with the process used at the Tennessee Valley Authority (TVA). TVA performs the evaluation of channel performance as reflected on Page 37, bullet 3. It is recommended that the wording from Page 37, bullet 3, be used here. Further evaluation is performed as reflected in the comments below regarding Page 28 (second paragraph).
Page 22 (second paragraph)	Delete the reference to TSTF-411 and any changes associated with TSTF-411. The reference, as given, implies corrections to NUREG-1431, Sections TS 3.3.6 and 3.3.7, although no changes have been made to these sections in Attachment A.

LOCATION	COMMENTS
Page 28 (second paragraph) (Also see comment for Page 20, above)	Statement: "The CAP evaluation is expected to be performed promptly to validate the determination that was performed prior to returning the channel to service and to confirm that the channel is operable and performing as expected." The statement (above) needs to be revised to agree with the wording provided in the first paragraph on Page 38. Reason: The requirement to address Concept 7 as worded on Page 28 and as restated above is inconsistent with previous sections of the document and contrary to the Industry's position on Concept 7. The engineering evaluation, performed in accordance with the Corrective Action Program (CAP) to validate the immediate operability determination, is a longer term activity. The immediate operability determination, performed by operations (with input from maintenance) in accordance with CAP is based on the concepts described in the first paragraph on Page 38.
Page 43 Section 3.2.1 (1st para., 3rd sentence)	Statement: "Furthermore, the licensee stated that if during calibration testing the setpoint is found to be conservative with respect to the limiting safety system settings (LSSS) but outside its predefined calibration tolerance, then the channel shall be brought back to within its predefined calibration tolerance before returning the channel to service." "LSSS" should be replaced with "Allowable Value (AV)."
Page 52 (last sentence)	The term "or needs to be replaced" is inappropriate and should be deleted. The licensee should determine what is required to correct the out of tolerance condition and it might not always include instrument replacement.
Page 56	5. Turbine Trip and Feedwater Isolation, Item c. Safety Injection (Automatic actuation logic circuit excluded from footnotes) is logic and therefore should be exempt.