



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

30 AUG 1984

MEMORANDUM FOR: Darrell G. Eisenhut, Director
Division of Licensing, NRR

FROM: Richard W. Starostecki, Director
Division of Project and Resident Programs, Region I

SUBJECT: NUREG-0737 TECHNICAL SPECIFICATIONS
(GENERIC LETTER NO. 82-16)
FOR INDIAN POINT UNIT 2 (TAC #49736)

This forwards, as an enclosure, the status of the review of technical specifications for NUREG-0737 items in the case of Indian Point Unit 2. The selected NUREG items involved in the review were identified in Generic Letter 82-16. Of the 13 items discussed in the Generic Letter, five have acceptable technical specifications (TS) in place, three are not applicable to the facility and five require further licensee submittals (see enclosure Items 2, 7, 8, 12 and 13).

The review of TAC #49736 by Region I involved 30 hours of technical staff effort. The principal reviewers for this action were Peter Koltay and Donald Haverkamp of my staff.

Richard W. Starostecki, Director
Division of Project and Resident
Programs

Enclosure:
As Stated

cc w/encl:
G. Lainas, AD/OR, NRR
S. Varga, Chief, ORB 1, NRR
P. Polk, PM, ORB 1, NRR
J. Thoma, TA, AD/OR, NRR
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STATUS SUMMARY OF NUREG-0737 TECHNICAL SPECIFICATIONS (TSs)
(GENERIC LETTER 82-16) FOR INDIAN POINT UNIT 2

Reference: J. D. O'Toole letter to D. G. Eisenhut dated May 31, 1983.

1. STA Training (I.A.1.1.3)

Amendment No. 68 dated May 7, 1981 and Amendment No. 72 dated September 3, 1981, incorporated qualification, training, and staffing requirements for the STAs into the facility TSs. The revised TSs were consistent with the NRC's model TSs for TMI lessons learned Category "A", Item 2.2.1.b. We note that STA training requirements are under consideration by the Commission, and further guidance may be provided pending the Commission's decision on the requirements.

2. Limit Overtime (I.A.1.3)

The licensee's administrative procedures conform to the guidance of Generic Letter 82-12 with the exception that the Maintenance Section is not bound by the overtime limitations during refueling/maintenance outages. The licensee has also taken the position that: (1) technical specifications are not needed for this item; and (2) commitment to comply with this item has already been made outside the technical specifications.

The project manager is requested to forward a letter (similar to the attached letter sent for Maine Yankee) requesting that the licensee propose Technical Specifications to address this item.

3. Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)

Amendment No. 79 dated August 30, 1982, incorporated appropriate TS for this item.

4. Safety Grade Auxiliary Feedwater Initiation and Flow Indication (II.E.1.2)

Same as Item 3 above.

5. Dedicated Hydrogen Penetrations (II.E.4.1)

No additional containment isolation valves were provided to satisfy this item. Therefore, no TS changes for Appendix J testing were necessary.

6. Containment Pressure Setpoint (II.E.4.2.5)

NRC letter dated November 20, 1981 and the enclosed technical evaluation dated May 1981 concluded that the existing set point, incorporated into the TS as part of Amendment 56 dated August 22, 1979, is acceptable.

7. Containment Purge Valves (II E.4.2.6)

NRC letter dated November 9, 1982 and the enclosed Safety Evaluation concluded that appropriate technical requirements were met for this item. However, additional necessary TS requirements were identified in a subsequent NRC letter dated September 29, 1983, which described the results of the staff's overall containment purge review. The PM should initiate a new TAC and continue to coordinate review of this item by appropriate NRR branches, when the licensee proposes TS for purge valves.

8. Radiation Signal on Purge Valves (II.E.4.2.7)

Same as Item 7 above.

9. Upgrade B&W EFW System (II.K.2.8)

Not applicable to Indian Point 2.

10. Safety Grade Anticipatory Reactor Trip B&W Only (II.K.2.10)

Not applicable to Indian Point 2.

11. B&W Thermal - Mechanical Report (II.K.2.13)

Not applicable to Indian Point 2.

12. Reporting SV and RV Failures and Challenges (II.K.3.3)

The licensee committed to reporting these items and this matter was technically resolved as described in an NRC letter dated March 4, 1982. However, the licensee did not propose TS changes to formalize their commitments as requested by Generic Letter No. 82-16. We note that the recently issued LER Rule (10 CFR 50.73) may have superseded, in part, the manner in which the licensee's TS should be revised. The project manager, in coordination with AEOD and ORAB, is requested to forward a letter requesting that the licensee propose technical specifications to address this item, consistent with 10 CFR 50.73 considerations.

13. Anticipatory Trip on Turbine Trip (II.K.3.12)

The licensee has not proposed TS changes, as requested by Generic Letter No. 82-16. Their stated position was that inclusion of this feature into their TS is "unwarranted, unnecessary and will not improve plant safety". Their stated bases is that this trip feature is not safety-grade and no credit is taken for the operation of this feature in their transient and accident analyses. The licensee's position may be technically correct, as the existing TS clearly state why the turbine trip settings are not included in TS 2.3. However, NUREG-0737 and Generic Letter No. 82-16 stated that TS changes should be submitted with no mention of credit taken for this item in transient and accident analysis.

The project manager, in coordination with appropriate NRR branches, is requested to forward a letter requesting that the licensee propose Technical Specifications to address this item.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 23 1983

Docket No. 50-309

Mr. John H. Garrity, Senior Director
Nuclear Engineering and Licensing
Maine Yankee Atomic Power Company
83 Edison Drive
Augusta, Maine 04336

Dear Mr. Garrity:

SUBJECT: TECHNICAL SPECIFICATIONS FOR LIMITING OVERTIME FOR STAFF PERSONNEL

This is in response to your letter dated January 21, 1983, in which you proposed to not incorporate technical specifications to limit overtime for plant staff personnel, pending publication of the final rule on supplemental technical specifications. The staff does not agree with your proposal.

Limiting overtime for critical shift job positions is not only a provision of NUREG-0737, "Clarification of TMI Action Plan Requirements," but is also the subject of Commission Policy. We feel sufficiently strong about the importance of this issue to require that provisions for limiting overtime be made part of the current facility technical specifications.

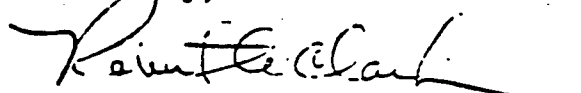
We do, however, have a flexible approach on how the specification is formulated. Enclosure 1 gives the full requested sample specification. It is sufficient for you to only incorporate the first two paragraphs.

We also note that, if the specification is submitted promptly, it can be considered supplemental to Proposed Change No. 101, currently in review.

Therefore, you are requested to submit, within 90 days of your receipt of this letter, proposed technical specifications for this item that comply with the guidelines furnished in our June 15, 1982 letter.

This request affects fewer than 10 respondents; therefore OMB clearance is not required under P.L. 96-511.

Sincerely,



Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure:
As stated

cc: See next page

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ADMINISTRATIVE CONTROL

UNIT STAFF (Continued)

- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

The amount of overtime worked by unit staff members performing safety-related functions shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

or

[Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the (Plant Superintendent) or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the (Plant Superintendent) or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.]