

April 14, 2010

Technical Specifications Task Force  
11921 Rockville Pike  
Suite 100  
Attention: Donald Hoffman  
Rockville, MD 20852

SUBJECT: NOTIFICATION OF ISSUE WITH NRC-APPROVED TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-425, REVISION 3, "RELOCATE SURVEILLANCE FREQUENCIES TO LICENSEE CONTROL - RITSTF INITIATIVE 5b"

Dear TSTF Members,

Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF [Risk-Informed Technical Specifications Task Force] Initiative 5b," dated March 18, 2009 (Agencywide Documents Access Management System Package Accession No. ML090850642), was approved by Notice of Availability published in the *Federal Register* on July 6, 2009 (74 FR 31996 - 32006).

Part of the TSTF-425 change to NUREGs-1430, -1431, -1432, -1433, and -1434 (Standard Technical Specifications for Babcock and Wilcox Plants, Westinghouse Plants, Combustion Engineering Plants, General Electric Plants ([boiling water reactor] BWR/4), and General Electric Plants (BWR/6), respectively) provides an optional insert (INSERT #2) to the existing technical specification (TS) Bases to facilitate adoption of the Traveler while retaining the existing NUREG TS surveillance frequency (SF) Bases considerations for licensees not choosing to adopt TSTF-425. The TSTF-425 TS Bases insert states as follows:

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

Recently several licensees submitting license amendment requests (LARs) for adoption of TSTF-425 have identified a need to deviate from this statement because it only applies to frequencies that have been changed in accordance with the Surveillance Frequency Control Program (SFCP) and does not apply to frequencies that are relocated but not changed.

NRC staff agrees that the TSTF-425 TS Bases insert applies to SFs that are relocated and subsequently evaluated and changed, in accordance with the SFCP. The TSTF-425 TS Bases does not apply to SFs relocated to the SFCP but not changed. Therefore, for SFs relocated to the SFCP but not changed, the existing TS Bases description remains a valid description of the TS SF Bases for the unchanged SF.

To resolve this issue with existing LARs and to avoid future problems, the NRC staff recommends the following changes to clarify the applicability of the TS SF Bases, maintain consistency with TSTF-425 TS SFCP requirements, and allow retention of existing TS SF Bases for licensees who choose not to adopt TSTF-425:

1. The bracket ([]) used to include the existing NUREG TS Bases describing the SF should be deleted.
2. The TSTF-425 TS Bases, INSERT #2, should be added to the end of the existing TS Bases and changed to read as follows:

[The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. Changes to the Surveillance Frequency are based on operating frequency, equipment reliability, and plant risk.]

To avoid delays with the TSTF-425 LARs, the NRC staff is committed to timely resolution of this issue. Please contact Mr. Robert Elliott, Technical Specifications Branch Chief, at (301) 415-8585 or Mr. Gerald Waig at (301) 415-2260 if you have any questions.

Sincerely,

**/RA/**

Eric E. Bowman, Acting Chief  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

Project No.: 753

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