

TSTF

TECHNICAL SPECIFICATIONS TASK FORCE
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SUBJECT: Technical Specification Task Force (TSTF) Response to the April 13, 2010 Federal Register Notice, "Notice of Opportunity for Public Comment on the 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'," **Docket ID NRC-2010-0150**

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject April 13, 2010 Federal Register Notice on TSTF-514, Revision 1, "Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation."

Should you have any questions, please contact us.

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SUNSI Review Complete
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1. The Notice for Comment, the section entitled, "Supplementary Information," second paragraph, states, "Licensees opting to apply for this TS change are responsible for reviewing the NRC staff's SE, and the applicable technical justifications, providing any necessary plant-specific information, and assessing the completeness and accuracy of their license amendment request (LAR)." The TSTF recommends that this sentence be revised to be more specific on what is meant by "applicable technical justifications." The TSTF recommends the sentence be revised to state, "Licensees opting to apply for this TS change are responsible for reviewing TSTF-514, Revision 1, and the NRC staff's SE, providing any necessary plant-specific information, and assessing the completeness and accuracy of their license amendment request (LAR)."
2. The cover letter for a license amendment request contains a general description of the proposed change. The second paragraph of the model application states, "[Discuss any differences with TSTF-514, Revision 1.]" The third paragraph of the cover letter states, "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." In both cases, this level of detail is unnecessary for the cover letter. We recommend that the bracketed sentence and the third paragraph be deleted and "A description of the proposed change is in Attachment 1," be added to the end of the second paragraph.
3. Section 1.0, "Description," of the model application, first paragraph, contains the sentence, "[Minor differences between the proposed plant-specific TS changes, and the changes proposed by Traveler-514 are listed in Section 2.0.]" We recommend that this sentence be deleted. The sentence is not optional (as indicated by the brackets) and adds no value. Section 2.0 describes all differences (minor or otherwise) or states that there are no differences.
4. The TSTF recommends that the model application, Section 4.0, "Technical Analysis," be revised to reference TSTF-514, Revision 1, and to not repeat the Traveler justification. Repeating the justification, which has been reviewed and accepted by the NRC, only creates confusion on the part of the licensee proposing to adopt the change and the NRC reviewers. Previous Travelers

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made available under the Consolidated Line Item Improvement Process (CLIIP) have referenced the Traveler instead of repeating the justification. The TSTF recommends that the first paragraph of Section 4.0 be replaced with, "[LICENSEE] has reviewed TSTF-514, Revision 1, and the model safety evaluation published on [DATE] ([] FR []) as part of the CLIIP Notice of Availability. [LICENSEE] has concluded that the justifications presented in TSTF Traveler-514, Revision 1, and the model safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.], and justify this amendment for the incorporation of the changes to the [PLANT] TS." This paragraph eliminates the need for the eighth paragraph of Section 4.0. The TSTF recommends that the third, fourth, and sixth paragraphs of Section 4.0 be deleted as they only serve to restate the TSTF-514, Revision 1, justification.

5. TSTF-514, Revision 1, proposed Condition D requires monitoring RCS leakage by administrative means when the primary containment atmospheric gaseous radiation monitor is the only operable monitor. Proposed Condition F requires verification of no increase in RCS leakage over pre-established values when all required leakage detection systems are inoperable. TSTF-514 gives examples of acceptable administrative means and methods for verifying no increase in leakage. However, the proposed model application, Section 4.0, "Technical Analysis," second and fifth paragraphs, specify that licensees state the specific methods to be used. This is not consistent with TSTF-514, Revision 1, which states, "There are diverse alternative mechanisms for determining that RCS leakage has not increased, *from which appropriate indicators may be selected based on plant conditions*. It is not necessary to utilize all of these methods, but a method or methods should be selected considering the current plant conditions and historical or expected sources of leakage. These methods *include, but are not limited to*, primary containment and drywell pressure, temperature, and humidity, Component Cooling Water System outlet temperatures and makeup, Reactor Recirculation System pump seal pressure and temperature and motor cooler temperature indications, Drywell cooling fan outlet temperatures, Reactor Building Chiller amperage, Control Rod Drive System flange temperatures, and Safety Relief Valves tailpipe temperature, flow, or pressure" (emphasis added). Providing this information in the application is also not consistent with the treatment of "administrative means" in other locations in the Improved Standard Technical Specifications (for example, NUREG-1433 Required Actions 3.5.1.C, 3.5.3.A,

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3.6.1.2.A, 3.6.1.2.B, 3.6.1.3.B). The ISTS Bases and plant amendments to adopt these provisions do not specify what administrative means may be chosen by the licensee. Restricting the use of administrative methods in this instance may unnecessarily restrict a licensee from choosing an appropriate method. We recommend that the second and fifth paragraphs of Section 4.0 be deleted. We also recommend that the second paragraph of Section 3.0, "Technical Evaluation," of the model Safety Evaluation be revised to eliminate the listing of specific methods to be used by the licensee and to insert the statements quoted above from the TSTF-514, Revision 1, justification.

6. Section 4.0, "Technical Analysis," of the model application, seventh paragraph, states, "{NOTE: Discuss how the plant licensing basis meets General Design Criterion 30 and cite applicable FSAR chapter/section.}" Section 2.0, Regulatory Evaluation, of the model Safety Evaluation begins with "{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.}" Many plants are not committed to the General Design Criteria (GDC) in 10 CFR 50, Appendix A, or the preliminary design criterion. Compliance with GDC 30 (or any alternative) is not assumed in the technical justification for TSTF-514, Revision 1.

If the staff believes that a statement of the current licensing basis for the RCS leakage detection instrumentation is required for the Safety Evaluation, then we recommend that Section 4.0 of the model application contain the following, "{NOTE: Provide a brief description of the current licensing basis for the RCS leakage detection instrumentation required by the Limiting Condition for Operation, commitment to General Design Criteria (GDC) 30 or any plant-specific criteria equivalent to 10 CFR 50, Appendix A, GDC 30, any commitment to Regulatory Guide 1.45, and cite the applicable Final Safety Analysis Report references.}" The Reviewer's Note in Section 2.0 of the draft Safety Evaluation should be moved to prior to the fifth paragraph (which begins "As stated in NRC Information Notice...") and be revised to state, "{REVIEWER'S NOTE: Insert the licensee's description of the current licensing basis for the RCS leakage detection instrumentation required by the Limiting Condition for Operation.}"

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7. In Section 5.1 of the model application, "No Significant Hazards Consideration Determination," and in the draft Safety Evaluation, occurrences of the phrase "primary containment/drywell" should be enclosed in brackets to indicate that one or the other should be used in the plant-specific application and Safety Evaluation. In addition, the acronym "RCS" should be redefined in Section 5.1 as the plant-specific No Significant Hazards Consideration Determination will be published in the Federal Register.
8. Section 5.2 of the model application, "Applicable Regulatory Requirements/Criteria," states, "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]." Section 2.0 of the staff's model SE discusses GDC 30 and Regulatory Guide 1.45. As stated in Comment 6, many plants are not committed to the General Design Criteria. Many plants are not committed to Regulatory Guide 1.45. As a result, many (probably a majority) of plants would be unable to state that the applicable the regulatory evaluation section of the model SE is applicable. The TSTF recommends that Section 5.2 be revised eliminate the second sentence in the paragraph.
9. The last paragraph of Section 2.0 of the model Safety Evaluation states, "The Bases ... provide background information, the applicable safety analyses, a description of the LCO, and the applicability for the RCS leakage detection instrumentation TS." The Bases for each specification also describe the Actions and the Surveillances. The TSTF recommends that the sentence be revised to be complete.
10. The last paragraph of Section 2.0 of the model Safety Evaluation states, "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 second phrase is not a complete sentence. The TSTF recommends that the paragraph be revised to state, "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, and, for these Specifications, the RCS leakage detection instrumentation design assumptions and licensing basis for the plant."