

July 7, 2010

Technical Specifications Task Force (TSTF)
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: ACCEPTANCE FOR REVIEW AND REQUEST FOR ADDITIONAL
INFORMATION FOR TRAVELER TSTF-432, REVISION 0, "CHANGE IN
TECHNICAL SPECIFICATIONS END STATES (WCAP-16294)," (TAC NO.
ME3469)

Dear Members of the TSTF:

By letter dated December 22, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML093570241), you submitted to the U.S. Nuclear Regulatory Commission (NRC) for review and approval Traveler TSTF-432, Revision 0, "Change in Technical Specifications End States (WCAP-16294)." Your submission noted that the review of this Traveler is exempt from review fees under 10 CFR Part 170 because it is a risk-informed Traveler. In accordance with the January 10, 2003 letter (ADAMS Accession No. ML030100090) from William D. Beckner (NRC) to Tony Pietrangelo (Nuclear Energy Institute), a fee waiver for this Traveler will apply.

The NRC staff has completed a preliminary review of your submission and determined it is sufficiently complete and appropriate to initiate a more comprehensive review.

Since completion of the preliminary acceptance review, the NRC staff has begun the comprehensive review and determined that additional information is needed to complete the comprehensive review. Enclosed is the NRC staff's request for additional information.

The TSTF-432, Revision 0, review schedule has been planned as shown in the table below. If circumstances should lead to anticipated or actual schedule slippage, the causing party should promptly notify and coordinate with the other party. Early completion of a milestone would not require further coordination.

MILESTONE	SCHEDULE DATE
Application	12/22/2009
Requests For Additional Information (RAIs)	7/15/2010
RAI Response from TSTF	8/16/2010
Issue Notice For Comment on Model Safety Evaluation and Model Application	10/15/2010
Issue Notice of Availability for Model Safety Evaluation and Model Application	2/15/2011

TSTF

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Please contact me at 301-415-4117 or at Barry.Miller@nrc.gov if you have any questions.

Sincerely,

/RA/

Barry W. Miller, Senior Project Manager
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 753

Enclosure:
As stated

cc: See next page

Please contact me at 301-415-4117 or at Barry.Miller@nrc.gov if you have any questions.

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Barry W. Miller, Senior Project Manager
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cc: See next page

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U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
REGARDING TSTF-432, REVISION 0, "CHANGE IN TECHNICAL
SPECIFICATIONS END STATES (WCAP-16294)," (TAC NO. ME3469)

The Technical Specifications Task Force (TSTF) proposed changes to the Standard Technical Specifications (STS) NUREG-1431, "Standard Technical Specifications Westinghouse Plants," Revision 3.0. The proposed changes implement Risk-Informed Technical Specification Initiative 1, "Technical Specifications Actions End States Modification" in NUREG-1431. The NRC staff requests the following additional information from the TSTF to complete its review of the proposed Traveler TSTF-432.

Basis For Request for Additional Information #1

The NRC's final safety evaluation for Topical Report (TR) WCAP-16294-NP, Revision 0, "Risk-Informed Evaluation to Technical Specification Required Endstates for Westinghouse Nuclear Steam Supply System Pressurized Water Reactors," (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100770146) found the proposed revisions to the STS and Bases acceptable subject to the limitations and conditions shown in Section 4.0. Section 4.0 states,

"Licensees requesting the TS changes to operate their plants in accordance with TR WCAP-16294-NP must include the following in the TS Bases to ensure that the implementation of this TR will be consistent with the NRC staff's evaluation:

1. The primary purpose for entry into Mode 4 end states is to accomplish short duration repairs to restore inoperable equipment.
2. The availability of the TDAFW pump is assured while the plant remains in Mode 4 in accordance with the assumption of the TR.
3. Operational procedures have been established to ensure long-term decay heat removal, should the SG cooling be lost while operating in Mode 4.
4. Include the NRC approved-TR as a reference in the TS Bases."

In the Submittal of TSTF-432, Revision 0, each Limiting Condition for Operation (LCO) with modified TS Required Action(s), to a new endstate of MODE 4, has a TS Bases reference to the NRC approved TR and the following paragraphs are added to the TS Bases Actions section:

"Remaining within the Applicability of the LCO is acceptable because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. ...). In MODE 4 there are two means

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of decay heat removal, which provides diversity and defense in depth. However, voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action ... is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.”

These proposed TS Bases changes meet item 4 of the limitation and conditions section in the NRC’s final safety evaluation for TR WCAP-16294-NP.

A reviewer’s note is added to the TS Bases LCO section in the auxiliary feedwater (AFW) system, TS 3.7.5.

Reviewer’s notes are useful to NRC reviewers and are available to all licensees. However, the NRC staff has a couple of concerns with the reviewer’s note. The first concern is the statements, “The requirement to maintain the TDAFW train available in order to remain in MODE 4 will be addressed by a licensing commitment to include a requirement that will be located in the Technical Specification Bases, a Licensee Controlled Document, or implementing procedures” and “The additional requirement to maintain the TDAFW train available in MODE 4 in accordance with WCAP-16294-NP-A, Rev. 1, may be included in this Bases or a reference to the location of this requirement (e.g., a specific location in the Technical Requirements Manual, other licensee controlled document, or the implementing procedure may be included in this Bases.” The proposed statements in the reviewer’s note allow the licensee the option to place the requirement outside of the TS Bases, which is not consistent with the NRC’s final safety evaluation. The NRC’s final safety evaluation requires licensees requesting the TS changes to operate their plants in accordance with TR WCAP-16294-NP and must include in the TS Bases, the assurance of the Turbine Driven (TD) AFW pump availability while the plant remains in Mode 4.

The second concern is that the requirement is only being placed in the AFW system TS Bases and is not being placed in the TS Bases Actions section(s) for each modified required action. In order to utilize the Mode 4 endstate, a requirement must be established to maintain the TDAFW train available in MODE 4 and it is appropriate to place this requirement in the TS Bases Actions section(s) for each modified required action since it is applicable to each modified required action.

Request for Additional Information #1

Explain how the proposed TS Bases in Traveler TSTF-432 meet Section 4.0, “Limitations and Conditions,” items 1, 2 and 3 in the NRC staff’s final safety evaluation for TR WCAP-16294-NP.