TECHNICAL SPECIFICATIONS TASK FORCE

TSTF

A JOINT OWNERS GROUP ACTIVITY

June 2, 2010

5/04/2010
75FR23822
(1)

TSTF-10-11
PROJ0753

RECEIVED
2010 JUN -3 AM 10: 29
RULES AND DIRECTIVES BRANCH USNRC

Michael T. Lesar
Chief, Rulemaking, Announcements and Directives Branch (RADB)
Division of Administrative Services
Office of Administration
Mail Stop: TWB–05–B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

SUBJECT: Technical Specification Task Force (TSTF) Response to the May 4, 2010 Federal Register Notice, "Notice of Opportunity for Public Comment on the Proposed Models for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-500, 'DC Electrical Rewrite - Update to TSTF-360'," **Docket ID NRC–2010–0170**

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject May 4, 2010 Federal Register Notice on TSTF-500, Revision 2, "DC Electrical Rewrite - Update to TSTF-360."

The TSTF has concluded that the model application published in the Notice is inconsistent with the draft Safety Evaluation and requires significant revision. We recommend that the model application be rewritten using the model application provided by the TSTF in our November 5, 2008 submittal of TSTF-500, Revision 1, as the starting point for the revision. The Notice for Comment should then be republished. The TSTF welcomes the opportunity to work with the NRC to revise the model application.

Should you have any questions, please contact us.

Kenneth J. Schrader (PWROG/W)

Donald W. Gregoire (BWROG)

Thomas W. Raidy (PWROG/CE)

Reene' Gambrell (PWROG/B&W)

cc: Robert Elliott, Technical Specifications Branch, NRC
Barry Miller, Licensing Processes Branch, NRC

E-RIDS=ADM-03

SUNSI Review Complete

11921 Rockville Pike, Suite 100, Rockville, MD 20852
Phone: 301-984-4400, Fax: 301-984-7600
Administration by EXCEL Services Corporation

PWROG PWR Owners Group

BWR OWNERS' GROUP

Template=ADM-013

B. Miller (BWR)
Add = M. Honcharik (MCH3)

Technical Specification Task Force (TSTF) Response to the May 4, 2010 Federal Register Notice, "Notice of Opportunity for Public Comment on the Proposed Models for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-500, 'DC Electrical Rewrite - Update to TSTF-360'," Docket ID NRC–2010–0170

TSTF-360, "DC Electrical Rewrite," was approved by the NRC in December 2000 and incorporated in Revision 1 of the Improved Standard Technical Specifications (ISTS) (NUREG-1430 through -1434). It has been adopted by plants as part of conversion to the ISTS and under specific license amendments. Adoption of TSTF-360 has been difficult for both the licensees and the NRC because the justification did not adequately address all aspects of the proposed Technical Specification (TS) changes. NRC provided a letter to the TSTF dated April 11, 2006 that described their concerns with TSTF-360. The TSTF formed a working group with industry experts and developed responses to the NRC concerns. With the agreement of the NRC, the TSTF developed a Traveler to address the shortcomings of TSTF-360.

TSTF-500, "DC Electrical Rewrite - Update to TSTF-360," updates and replaces TSTF-360. With the exception of changes to the "Battery Monitoring and Maintenance Program" to reference IEEE-450-2002 and Regulatory Guide 1.129, Revision 2, there are no technical differences between TSTF-360 and TSTF-500. TSTF-500 expands and reorganizes the TSTF-360 justification to fully describe and justify each TS change. The TSTF-500 justification includes the resolution of the NRC's April 11, 2006 comments and is consistent with the NRC's approval of plant-specific amendments to adopt TSTF-360.

TSTF-500, Revision 0, was submitted to the NRC on August 31, 2007. In response to NRC comments, Revision 1 was submitted on November 5, 2008 and Revision 2 was submitted on September 2, 2009. Many of the NRC comments were related to the content of the model application and were reflected in the model application submitted by the TSTF with Revision 1 of TSTF-500.

A purpose of TSTF-500 is to provide guidance to licensees on requesting the proposed changes and to provide a complete and well organized justification from which the NRC could write a model Safety Evaluation. A complex change such as TSTF-500 requires providing plant-specific technical information to the NRC. The TSTF provided a model application for the adoption of TSTF-500 with Revision 1 of the Traveler. The industry model application specified the information to be provided with attachments for required analyses.

The TSTF has reviewed the subject Notice for Comment. The TSTF has specific comments on the draft Safety Evaluation and the proposed No Significant Hazards Consideration Determination, given below. However, the TSTF determined that the model application is inconsistent with the draft Safety Evaluation and fails to accomplish the purpose of the Traveler. The changes needed to correct the published model application are extensive and cannot be corrected with comments on the published model. Therefore, the TSTF recommends that the NRC rewrite the model application, using the model application provided by the TSTF with Revision 1 of the Traveler as the starting point, and republish the Notice for Comment with the revised model application. The TSTF welcomes the opportunity to work with the NRC to revise the model application to facilitate plant-specific submittal and NRC review.

The following points out many of the shortcomings of the proposed model application. This list is not comprehensive and is in no particular order, but illustrates the issues to be addressed:

- The model application requires the licensee to submit a plant-specific justification for the proposed changes in addition to confirming that the justification in TSTF-500 and the model Safety Evaluation adequately justify the changes. This eliminates the benefit of TSTF-500. Section 2.1, "Applicability of the Published Safety Evaluation," states:

  > "[LICENSEE] has reviewed the model safety evaluation (SE) referenced in the Federal Register Notice of Availability published on [DATE] ([ ] FR [ ]). The review included the NRC staff's SE, as well as the supporting information provided in TSTF-500, Revision 2. As described herein, [LICENSEE] has concluded that the justifications presented in TSTF-500, Revision 2, and the model SE prepared by the NRC staff are applicable to [PLANT] and justify this amendment for the incorporation of the changes to the [PLANT] TS." (emphasis added).

  However, Section 3.0, Background, states:

  > "{NOTE: Provide the plant-specific regulatory background in support of the application. Describe the plant-specific design bases to show that design is adequate to support the proposed changes (e.g., adequate: independence, redundancy, and design of equipment (e.g., adequate equipment ratings, sizing, testing, etc.))}."

  Section 4.0, "Technical Analysis," states:

  > "{NOTE: Provide a detailed technical analysis to support adoption of TSTF-500, Revision 2. Discuss the effect of the changes on the design bases of the plant, including plant specific information explaining plant-unique design feature(s). The technical analysis must clearly explain the design bases for the plant to show the technical adequacy to support adopting TSTF-500, Revision 2.}"

  The TSTF and the NRC have spent four years developing TSTF-500. Its purpose is to facilitate the adoption and review of the proposed changes. The industry model application listed the plant-specific information to be provided or confirmed. However, Sections 3 and 4 of the published model application ignore the work that has been done and would require each licensee to develop plant-specific justifications. We recommend the industry model application format be used for the revised model application.

- The Proposed Model Safety Evaluation, in Section 2, contains a Reviewer's Note that requires the NRC reviewer to describe the FSAR statements regarding the applicant's licensing basis, such as preliminary design criteria and/or general design criteria, why they apply, and what they say. However, this information is not requested in the model application.

- The Proposed Model Safety Evaluation requires description of many facets of the plant design, but the model application does not require that information to be provided. This creates an error-prone situation in which the licensee must determine what information must be provided, in what level of detail, and in what format, and creates the likelihood that the

NRC will need to issue a Request for Additional Information. For example, the Proposed Model Safety Evaluation states:

- "In accordance with [PLANT's] Final Safety Analysis Report (FSAR) Section [8.3.2] and TS Section [3.8.4], during normal operation, the DC load is powered from the battery chargers with the batteries floating on the system."

- "In accordance with [PLANT's] FSAR Section [8.3.2], each battery is designed with additional capacity above that required by the design duty cycles to allow for [temperature variations and other factors]."

- "[[LICENSEE] cannot meet the 12-hour CT due to an inherent battery charging characteristic and proposes an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service discharge test (SR 3.8.4.3)."

- "Licensees crediting a non-Class 1E battery charger as the spare battery charger must ensure that electrical isolation is maintained in accordance with RG 1.75]."

- "[L]icensees must still provide a justification for relocating the cell connection resistance limit [150 μOhm (micro-Ohm)] or for revising the monitoring limit."

- "[LICENSEE] has described the methodology for determining the design margin (e.g., 5 percent) that must be maintained in order to utilize float current monitoring as an indication of a battery state of charge."

- "[LICENSEE] stated that the design margin is selected by using the mathematical properties of an exponential decay curve."

- "[LICENSEE] stated that no changes to the float current limit would be required for replacement batteries of the same size and model number."

- "[LICENSEE] has verified that the equipment that will be used to monitor float current under [SR 3.8.6.1] will have the necessary accuracy and capability to measure electrical currents in the expected range."

- "[[LICENSEE] cannot meet the [12]-hour CT due to an inherent battery charging characteristic, and proposes an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3)]."

- "The [LICENSEE] stated that battery room temperature is alarmed and periodically monitored by [PLANT] Operations as part of the operator's rounds. The [PLANT] battery rooms are contained in a separate environmentally controlled area outside the engineered safety feature switchgear rooms.] [LICENSEE] has stated that the temperature of the room containing the batteries is monitored at least [INSERT MINIMUM FREQUENCY]

during reactor operator tours. [Furthermore, the [LICENSEE] stated that the first indication of a problem with battery temperature would be the actuation of a Control Room alarm when room temperature approaches [66 degrees Fahrenheit]. According to the [LICENSEE], Operators would implement corrective measures in accordance with plant procedures and operating instructions."

- "[[LICENSEE] stated that the maximum temperature deviation across the battery does not exceed the IEEE Std. 450-2002 recommended maximum of 5 degrees Fahrenheit (°F), cell temperature, and therefore, the license does not take temperature into account when selecting battery pilot cells.] [[LICENSEE] stated that the maximum battery temperature deviation across the battery exceeds the IEEE Std. 450-2002 recommended maximum of 5 degrees Fahrenheit (°F), cell temperature.]"

The model application proposed by the industry contains specific verifications to be provided by the licensee to support these types of statements in the NRC's Safety Evaluation. We recommend that format be used in the revised model application.

- TSTF-500 contains the option to request extended Completion Times for some Required Actions based on a risk evaluation. However, the published model application contains conflicting statements regarding the risk evaluations. Unlike the industry provided model application, the published model application does not specify where in the application the risk evaluation is provided and also states that such evaluations are not required. Attachment 2 of the published model, "List of Required Final Safety Analysis Report (FSAR) Descriptions," states, "[[LICENSEE] requests a battery charger CT greater than 72 hours and did not provide a supporting risk-informed evaluation in accordance with RGs 1.174 and 1.77]." This directly conflicts with the Proposed Model Safety Evaluation, which states:

  - "[LICENSEE] proposes to adopt a CT longer than 72 hours and has demonstrated that the CT is appropriate for the plant in accordance with the guidance in RG 1.177 and RG 1.174."

  - "[LICENSEE] proposes a longer CT and has provided justification that the longer CT is appropriate for the plant consistent with the guidance in RG 1.177 and RG 1.174."

- Attachment 2 of the published model, "List of Required Final Safety Analysis Report (FSAR) Descriptions," states, "The following table identifies FSAR descriptions required by [LICENSEE] as part of the adoption of TSTF-500, Revision 2. The intent of the FSAR descriptions is to ensure that application of the 10 CFR 50.59 screening criteria will result in an evaluation under 10 CFR 50.59." The second sentence is incorrect. A license amendment request cannot alter the regulatory requirements of 10 CFR 50.59. In accordance with the regulations, not all changes to information in the FSAR will result in an evaluation under 10 CFR 50.59. This sentence should be eliminated. In addition, some of the information listed in Attachment 2 is inappropriate for the FSAR or changes to the information would not fall under 10 CFR 50.59.

Technical Specification Task Force (TSTF) Response to the May 4, 2010 Federal Register Notice, "Notice of Opportunity for Public Comment on the Proposed Models for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-500, 'DC Electrical Rewrite - Update to TSTF-360'," Docket ID NRC–2010–0170

To facilitate the NRC's consideration of these comments, a copy of the model application provided by the industry with Revision 1 of TSTF-500 is included below. The TSTF recognizes that based on subsequent NRC decisions, the No Significant Hazards Consideration Determination and Environmental Consideration would need to be included in the model application in lieu of referencing the Federal Register notice.

Comments on the No Significant Hazards Consideration Determination

1. To facilitate plant-specific publication in the Federal Register of the No Significant Hazards Consideration Determination, all acronyms should be defined. We recommend the response to Question 1 be revised to define "TS" and "FSAR."

2. In response to Question 1, second paragraph, the proposed determination states, "The integrity of fission product barriers, plant configuration, and operating procedures as described in FSAR [insert appropriate chapter/section number] will not be affected by the proposed changes." The description of "fission product barriers, plant configuration, and operating procedures," encompasses a large fraction of the FSAR content and it is impractical and unnecessary to reference every location in the FSAR that contains this information. We recommend that the bracketed phrase be removed.

Comments on the Proposed Model Safety Evaluation

1. Section 2.0, "Regulatory Evaluation," references Station Blackout, 10 CFR 50.63(a)(1). Station Blackout is not part of the "specified safety functions" required for battery operability under the Technical Specifications. Therefore, this reference is not relevant to the proposed TS change and should be removed.

2. Section 2.0, "Regulatory Evaluation," and Section 5.0, "References," refer to Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and Regulatory Guide 1.177, "An approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." These references are only applicable if the licensee is proposing a Completion Time longer than 72 hours for Specifications 3.8.4, Required Action A.3, and 3.8.5, Required Action A.3, or a Completion Time longer than 2 hours for Specification 3.8.4, Required Action B.1 and C.1. These references should be bracketed with a Reviewer's Note describing when they are applicable.

Proposed Model Application for the CLIIP Notice for Comment for TSTF-500, "DC Electrical Rewrite - Update to TSTF-360" Submitted November 5, 2008

[DATE]

U. S. Nuclear Regular Commission
Document Control Desk
Washington, DC 20555

SUBJECT: PLANT NAME
DOCKET NO. 50-[xxx]
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS REGARDING D C ELECTRICAL SYSTEMS TSTF-500, REVISION 1, "DC ELECTRICAL REWRITE – UPDATE TO TSTF-360," USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

Dear Sir or Madam:

In accordance with the provisions of 10 CFR 50.90, [LICENSEE] is submitting a request for an amendment to the technical specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed amendment would modify TS requirements related to direct current (DC) electrical systems in accordance with TSTF-500, Revision 1, "DC Electrical Rewrite - Update to TSTF-360."

Attachment 1 provides a description and assessment of the proposed changes, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed changes. [Attachment 3 provides revised (clean) TS pages.] [Attachment [4] provides a summary of the regulatory commitments made in this submittal.] Attachment [5] provides existing TS Bases pages marked up to show the proposed changes.

[LICENSEE] requests approval of the proposed license amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated [STATE] Official.

[In accordance with 10 CFR 50.30(b), a license amendment request must be executed in a signed original under oath or affirmation. This can be accomplished by attaching a notarized affidavit confirming the signature authority of the signatory, or by including the following statement in the cover letter: "I declare under penalty of perjury that the foregoing is true and correct. Executed on (date)." The alternative statement is pursuant to 28 USC 1746. It does not require notarization.]

If you should have any questions regarding this submittal, please contact [NAME, TELEPHONE NUMBER].

Sincerely,

[Name, Title]

Attachments:
1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-Up)
[3. Revised Technical Specification Pages]
[4]. Regulatory Commitments
[5]. Proposed Technical Specification Bases Changes (Mark-Up)

Enclosures:
1. Letters from Battery Manufacturers Verifying the Acceptability of Using Float Current Monitoring
[2. Evaluation of an Extended Completion Time for Specification[s] [3.8.4, Required Action A.3 and 3.8.5, Required Action A.3]
[3. Evaluation of an Extended Completion Time for Specification[s] [3.8.4, Required Actions B.1 and C.1]

cc: NRC Project Manager
NRC Regional Office
NRC Resident Inspector
State Contact

ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed amendment would modify technical specification (TS) requirements related to direct current (DC) electrical systems in LCO 3.8.[4], ["DC Sources - Operating,"] LCO 3.8.[5], ["DC Sources - Shutdown,"] and LCO 3.8.[6], ["Battery Parameters."] A new "Battery Monitoring and Maintenance Program" is being proposed for Section 5.5 ["Administrative Controls - Programs and Manuals."]

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) change TSTF-500, Revision 1. The availability of this TS improvement was published in the Federal Register on [DATE] as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the model safety evaluation dated [DATE] as part of the CLIIP Federal Register Notice for Comment. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-500. [As described in the subsequent paragraphs,][LICENSEE] has concluded that the justifications presented in the TSTF-500 proposal 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.

[The [PLANT] TS utilize different [numbering][and][titles] than the Standard Technical Specifications on which TSTF-500 was based. Specifically, [describe differences between the plant-specific TS numbering and/or titles (including Required Actions and Surveillances) and the TSTF-500 numbering and titles.] [In addition, TSTF-500 deletes certain Surveillances and renumbers the subsequent Surveillances. [LICENSEE] has chosen to retain the deleted Surveillance numbers, mark them "Deleted," and to not renumber the subsequent Surveillances. These differences are administrative and do not affect the applicability of TSTF-500 to the [PLANT] TS.]

[The [PLANT] DC system design differs from the design assumed for the standard plant described in the Standard Technical Specifications Bases and TSTF-500. [Describe significant differences between the plant-specific DC system design and the reference design described in the STS Bases. For each difference, justify why the published Safety Evaluation continues to be applicable to the plant-specific design.]

[The [PLANT] Technical Specifications differ from the Standard Technical Specifications which were the basis for TSTF-500. [Describe any non-administrative differences between the changes proposed in the plant-specific amendment and changes proposed in TSTF-500,

such as Required Actions or Surveillances that are affected by TSTF-500 that do not exist in the plant-specific TS or features in the plant-specific TS that are affected by the proposed amendment that do not appear in the TSTF-500. For each difference, justify why the published safety evaluation continues to be applicable to the plant-specific amendment.]

2.2 Verifications and Regulatory Commitments

As described in Section 4.7.1, "Verifications," in TSTF-500, [LICENSEE] provides the following verifications.

1. In Enclosure 1, [LICENSEE] has provided letter(s) from the manufactures of the batteries used at [PLANT] verifying the acceptability of using float current monitoring instead of specific gravity monitoring as a reliable and accurate indication of the state-of-charge of the battery and that this will hold true over the life of the battery.

2. [LICENSEE] verifies that battery room temperature is routinely monitored such that a room temperature excursion could reasonably expect to be detected and corrected prior to the average battery electrolyte temperature dropping below the minimum electrolyte temperature.

3. [LICENSEE] verifies that the equipment that will be used to monitor float current under SR [3.8.6.1] will have the necessary accuracy and capability to measure electrical currents in the expected range.

4. [LICENSEE] verifies that there is an appropriate basis for the relocated cell connection resistance limit ([150] μOhm or a revised monitoring value) which are relocated to the Battery Monitoring and Maintenance Program. [Provide a brief description of the basis for the cell connection resistance limit based on the vendor specification of inter-cell resistance, voltage drop at the connection, or overall battery resistance.]

5. [LICENSEE] is proposing to delete the [SR 3.8.4.7 (now SR 3.8.4.3)] Note "once per 60 months" restriction on performing the modified performance discharge test instead of the service test. [LICENSEE] has confirmed that the modified performance discharge test completely encompasses the load profile of the battery service test and that it adequately confirms the intent of the service test to verify the battery capacity to supply the design basis load profile.

As described in Section 4.7.2, "Commitments," in TSTF-500, [LICENSEE] makes the following regulatory commitments.

1. [LICENSEE] commits to include in a licensee-controlled program that is controlled under 10 CFR 50.59 a requirement to maintain a [5] percent design margin for the batteries which corresponds to a [2] amp float current value that is an indication that the battery is [95] percent charged.

2. [LICENSEE] commits that the licensee-controlled program, required and described in TS Section 5.5, "Programs and Manuals," and titled the "Battery Monitoring and Maintenance Program," will require verification of the selection of the pilot cell or cells when performing SR 3.8.6.5.

[3. [LICENSEE] commits to a licensee-controlled program that will require the availability of a means to charge the batteries that is capable of being supplied power from a power source that is independent of the offsite power supply.] (Applicable to plants which use this justification for an extended Completion Time for Specification[s] [3.8.4, Required Actions A.3 and/or B.1, and 3.8.5, Required Action A.3]).]

2.3 Optional Changes and Variations

[LICENSEE is not proposing any variations or deviations from the TS changes described in the TSTF-500, Revision 1, or the applicable parts of the NRC staff's model safety evaluation dated [DATE].] [LICENSEE is proposing the following variations from the TS changes described in the TSTF-500, Revision 1, or the applicable parts of the NRC staff's model safety evaluation dated [DATE]. These options were recognized as acceptable variations in TSTF-500 and the NRC staff's model safety evaluation.]

[[Specification [3.8.4], Required Action A.2, applies when one [or two] battery charger[s] on one train [being changed to subsystem] are inoperable. The Required Actions return the battery to the fully charged state and restore a fully qualified battery charger to Operable status in a reasonable time period. Required Action A.2 states that the battery float current must be verified to be $\leq$ [2] amps once per [12] hours. Consistent with the Reviewer's Note in the Bases, [LICENSEE] has determined that [PLANT] cannot meet the 12 hour Completion Time proposed in TSTF-500 due to an inherent battery charging characteristic. [Describe the inherent battery charging characteristics that prevents charging within 12 hours]. [LICENSEE] proposes a Completion Time for Required Action A.2 of [XX] hours, which is equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test.]

[[LICENSEE] is proposing a Completion Time longer than 72 hours for Specification[s] [3.8.4, Required Action A.3, and 3.8.5, Required Action A.3]. As described in TSTF-500 and the Bases Reviewer's Notes, an evaluation supporting the longer Completion Time is included as Enclosure 2. The evaluation confirms the availability of a spare battery charger that is appropriately sized. [This evaluation is performed in accordance with the guidance provided in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."] [The Completion Time is justified by a regulatory commitment that a means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. [Describe the power source.]]

[[LICENSEE] is proposing a Completion Time longer than 2 hours for Specification [3.8.4, Required Action B.1 and C.1]. As described in TSTF-500 and the Bases Reviewer's Notes, a risk evaluation supporting the longer Completion Time is included as Enclosure 3. This evaluation is in accordance with the guidance provided in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."]

[LICENSEE] is proposing to adopt Specification [3.8.4], Condition B. Condition B is included because Required Action B.1 (battery inoperable) and Required Action C.1 (DC electrical power subsystem inoperable) should have different Completion Times. [Describe why there should be different Completion Times.]

3.0 REGULATORY ANALYSIS

3.0 No Significant Hazards Consideration Determination

[LICENSEE] has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. [LICENSEE] has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to [PLANT] and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

4.0 ENVIRONMENTAL EVALUATION

[LICENSEE] has reviewed the environmental evaluation included in the model safety evaluation dated [DATE] as part of the CLIIP. [LICENSEE] has concluded that the staff's findings presented in that evaluation are applicable to [PLANT] and the evaluation is hereby incorporated by reference for this application.

Proposed Model Application for the CLIIP Notice for Comment for TSTF-500, "DC Electrical Rewrite - Update to TSTF-360" Submitted November 5, 2008

ATTACHMENT 2 - PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

[ATTACHMENT 3 - REVISED TECHNICAL SPECIFICATION PAGES]

ATTACHMENT [4] - REGULATORY COMMITMENTS

The following table identifies those actions committed to by [LICENSEE] in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to [CONTACT NAME].

REGULATORY COMMITMENTS	DUE DATE / EVENT
[LICENSEE] commits to include in a licensee-controlled program that is controlled under 10 CFR 50.59 a requirement to maintain a [5] percent design margin for the batteries which corresponds to a [2] amp float current value that is an indication that the battery is [95] percent charged.	Upon implementation of the approved TS amendment
[LICENSEE] commits that the licensee-controlled program, required and described in TS Section 5.5, "Programs and Manuals," and titled the "Battery Monitoring and Maintenance Program," will require verification of the selection of the pilot cell or cells when performing SR 3.8.6.5.	Upon implementation of the approved TS amendment
[[LICENSEE] commits to a licensee-controlled program that will require the availability of a means to charge the batteries that is capable of being supplied power from a power source that is independent of the offsite power supply.] (Applicable to plants which use this justification for an extended Completion Time for Specification[s] [3.8.4, Required Action(s) A.3 and/or B.1, and 3.8.5, Required Action A.3]).]	Upon implementation of the approved TS amendment
[LICENSEE] commits to implement Technical Bases changes consistent with the Bases in TSTF-500 in accordance with the Technical Specifications Bases Control Program.	Upon implementation of the approved TS amendment

ATTACHMENT [5] - PROPOSED CHANGES TO TECHNICAL SPECIFICATION BASES CHANGES (MARK-UP)PAGES

ENCLOSURE 1 - LETTER(S) FROM BATTERY MANUFACTURERS VERIFYING THE ACCEPTABILITY OF USING FLOAT CURRENT MONITORING

[ENCLOSURE 2 - EVALUATION OF AN EXTENDED COMPLETION TIME FOR SPECIFICATION[S] [3.8.4, REQUIRED ACTION A.3 AND 3.8.5, REQUIRED ACTION A.3]

[ENCLOSURE 3 - EVALUATION OF AN EXTENDED COMPLETION TIME FOR SPECIFICATION[S] [3.8.4, REQUIRED ACTIONS B.1 AND C.1]