

June 17, 2010

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

SUBJECT: WITHDRAWAL OF TSTF-517, REVISION 0, "ALLOWANCE FOR NON-TS COOLING/VENTILATION SYSTEMS DEGRADATION ON SUPPORT SYSTEM OPERABILITY" (TAC NO. ME2950)

Dear Members of the TSTF:

By letter dated October 28, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML093020066), the Technical Specifications Task Force (TSTF) submitted for U.S. Nuclear Regulatory Commission (NRC) staff review Traveler TSTF-517, Revision 0, "Allowance for Non-TS Cooling/Ventilation Systems Degradation on Support System Operability." The scope of the Traveler was limited to cooling or ventilation systems not separately addressed by Technical Specifications (TS).

During the acceptance review, the NRC staff identified concerns with TSTF-517, Revision 0, and discussed them with the TSTF in a telephone conference held on April 29, 2010. Specifically, the staff noted that TSTF-517 proposed to use a simplified risk assessment methodology that was similar to the methodology used by approved Traveler TSTF-427-A, Revision 2. The staff noted that TSTF-427-A addressed the unavailability of passive hazard barriers not separately addressed by TS and that a simplified risk assessment was justified because the impact of unavailability of these barriers only affected a low probability initiating event (high energy line break). The impact of cooling and ventilation system unavailability, however, is more significant because it renders supported components unavailable for any initiating event and has the same impact as a supported component being inoperable for other causes. Additionally, plant-specific risk models should be capable of a direct assessment of risk due to the unavailability of cooling or ventilation support systems, which is not the case for passive hazard barriers. Finally, the staff indicated that the guidance in NEI 06-09, Revision 0, approved by the staff to support Risk Informed Initiative 4b, is the appropriate method to determine a risk-informed completion time for cooling or ventilation support system unavailability.

By letter dated May 13, 2010, the TSTF withdrew Traveler TSTF-517 from further NRC review. In the withdrawal letter, you indicated that the methodology used to support TSTF-517 is not sufficiently rigorous to support the proposed changes and that the methodology employed for Risk Informed Initiative 4b is better suited to this application. You further indicated that this is being pursued in a separate Traveler.

Based upon your withdrawal of TSTF-517, Revision 0, the NRC staff will terminate review and TAC No. ME2950 will be closed.

TSTF

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If you have any questions regarding this matter, please contact Barry Miller at (301) 415-4117.

Sincerely,

/RA/

Stacey L. Rosenberg, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No: 753

cc: See next page

TSTF

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If you have any questions regarding this matter, please contact Barry Miller at (301) 415-4117.

Sincerely,

/RA/

Stacey L. Rosenberg, Chief
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