

July 27, 2010

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TSTF-505,
REVISION 0, PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES –
RITSTF INITIATIVE 4B (TAC NO. ME3889)

Dear Members of the TSTF:

By letter dated March 29, 2010, the Technical Specifications Task Force (TSTF) submitted TSTF-505, Revision 0, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b," for NRC review. The U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is needed to complete the review. Enclosure 1 is the NRC staff's request for additional information.

The NRC has previously reviewed and approved Nuclear Energy Institute 06-09, Revision 0, as a methodology for implementing RITSTF Initiative 4b, and has approved a license amendment for a pilot plant for RITSTF 4b. This request is solely related to the proposed scope of the limiting conditions for operation included in the Traveler; there are no new technical issues related to RITSTF 4b being raised in this review. A full and complete response to these items is requested by September 10, 2010, in order to maintain the current schedule for completion of our review.

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

Enclosure:
Request for Additional Information

cc: See next page

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U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
REQUEST FOR ADDITIONAL INFORMATION
REGARDING TSTF-505, REVISION 0, PROVIDE RISK-INFORMED EXTENDED
COMPLETION TIMES – RITSTF INITIATIVE 4B (TAC NO. ME3889)

1. Each of the Standard Technical Specifications (STS) markups for the limiting conditions for operation (LCO) Section 3.3 includes in the scope of the risk-informed completion time (RICT) program required actions to place an inoperable actuation channel in trip or bypass. The pilot application only addressed required actions for restoring a function to operable status, and specifically did not address actions for tripping or bypassing individual channels. The RICT calculation of the time permitted prior to bypassing an inoperable channel is illogical. The delta risk is based on the change due to a channel being unable to perform its intended function compared to the channel being functional, but the action is to assure the channel cannot perform its function. Therefore, the RICT is calculating an acceptable time to permit operation with one inoperable channel prior to placing the channel in a condition where it is permanently inoperable (no further actions required) – the delta risk between these two states is zero. A RICT should not apply to the actions for tripping or bypassing channels since continued plant operation can continue once the channel is tripped or bypassed, and there should be no need to delay these actions. These types of actions should be deleted from the scope of the traveler or a justification provided for applying a RICT.
2. New actions are established in each of the three pressurized water reactor (PWR) STS for various instrumentation LCOs (Section 3.3, listed below) to address conditions where multiple channels are inoperable. These new actions are worded inconsistently; in that some say to restore a specific number of channels to OPERABLE in order to exit the condition and enter another condition, while others say to restore all inoperable channels to OPERABLE. If no difference in TS action is intended, then the wording needs to be made consistent.

ENCLOSURE

Babcock and Wilcox Owners'
Group (BWOG)

3.3.1 C.1
3.3.3 B.1
3.3.5 B.1
3.3.11D.1
3.3.13 B.1
3.3.14 B.1

Combustion Engineering Owners'
Group (CEOG)

3.3.5 (Analog) E.1

Westinghouse Owners' Group
(WOG)

3.3.1 G.1
3.3.1 I.1
3.3.1 Q.1
3.3.1 W.1
3.3.1 Z.1
3.3.1 JJ.1
3.3.2 I.1
3.3.2 K.1
3.3.2 Q.1
3.3.2 S.1
3.3.2 U.1

3. Required actions associated with LCOs for systems that provide no mitigation function of severe accidents (core damage or large early release prevention) and are unrelated to initiating events are included in all the STS. The following LCOs need to be justified as to their severe accident function(s), or removed from the scope of the traveler.

BWOG	CEOG	Boiling Water Reactor (BWR)/4
3.3.15	3.3.8 (Analog)	
3.3.16	3.3.9 (Analog)	3.3.2.1
3.3.17	3.3.10 (Analog)	3.3.3.1
3.4.5	3.3.11 (Analog)	3.3.6.2
3.4.15	3.3.9 (Digital)	3.3.7.1
3.6.7	3.3.10 (Digital)	3.4.1
3.7.10	3.3.11 (Digital)	3.4.2
3.7.12	3.4.15	3.4.6
3.7.13	3.5.5	3.6.1.6
	3.6.7	3.6.1.9
WOG	3.6.8	3.6.4.1
	3.6.10	3.6.4.2
3.3.3	3.6.11	3.6.4.3
3.3.6	3.6.12	3.7.6
3.3.7	3.7.11	
3.3.8	3.7.13	BWR/6
3.4.15	3.7.14	
3.6.7	3.7.15	3.3.2.1
3.6.8		3.3.3.1
3.6.11		3.3.6.2
3.6.12		3.4.2
3.6.13		3.4.3
3.7.10		3.4.7
3.7.12		3.6.1.6
3.7.13		3.6.1.8
3.7.14		3.6.1.9
		3.6.4.1
		3.6.4.2
		3.6.4.3
		3.7.5

4. The scope includes containment temperature, pressure, and other conditions which establish the initial conditions of the accident analyses, and not complying with these is equivalent to loss of a fission product barrier. The following LCOs should be removed from the scope of the traveler.

BWOG	CEOG	BWR/6
3.6.4	3.6.4	3.6.1.4
3.6.5	3.6.5	3.6.1.5
		3.6.5.4
WOG	BWR/4	3.6.5.5
3.6.4A	3.6.1.4	
3.6.4B	3.6.1.5	
3.6.5A	3.6.2.5	
3.6.5B	3.6.3.2	

5. Each of the PWR STS includes a RICT for performance of an analysis to verify steam generator (SG) tube integrity to end-of-cycle. A RICT is not appropriate to calculate the risk of completion of an analysis. The following LCOs should be removed from the scope of the traveler.

BWOG 3.4.17 A.1
WOG 3.4.20 A.1
CEOG 3.4.18 A.1

6. For BWOG STS LCO 3.4.9, the pressurizer is not a valid surrogate since it does not address a function that mitigates a severe accident by preventing core damage or large early releases from containment. (Note that neither WOG nor CEOG STS includes this function.) This item should be removed from the scope of the traveler.
7. For BWOG STS, Section 5.5.18 was not provided to identify changes to include the RICT program. These changes should be provided.
8. CEOG 3.3.3 (Digital) Required Action B.1 is invoked if the RICT of Required Action A.2 is exceeded, and it provides for a second RICT. This is not appropriate and is inconsistent with other STS actions. However, all the actions in this Condition relate to assuring plant conditions are within analysis limits, and so a RICT is not appropriate. This item should be removed from the scope of the traveler.
9. CEOG 3.3.3 (Digital) Required Action D.1 is to perform a test within 24 hours, not to restore inoperable components. This item should be removed from the scope of the traveler.