

From: Miller, Barry
Sent: Thursday, August 12, 2010 3:40 PM
To: 'Brian Mann'
Subject: FW: TSTF-283 Notes

Brian,

In accordance with the action item regarding TSTF-283, "Modify Section 3.8 Mode restriction Notes," that came out of our July 15, 2010, public meeting, forwarded below is an email from Matt McConnell describing our take on the Notes contained in SR 3.8.4.3 and SR 3.8.6.6.

Thanks,

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From: McConnell, Matthew
Sent: Tuesday, August 10, 2010 2:13 PM
To: Miller, Barry
Cc: Waig, Gerald
Subject: RE: TSTF-283 Notes

The Notes contained in Improved Standard Technical Specification (TS) Surveillance Requirements (SRs) 3.8.4.3 and 3.8.6.6 state that the surveillances shall not be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.

The NRC staff is not aware of any circumstance that would require credit to be taken for portions of SR 3.8.4.3 or SR 3.8.6.6 (rather than the complete surveillance test) for the purpose of reestablishing operability of the battery. The staff is also not aware of any industry standard or acceptable method that would allow credit to be taken for portions of either of the above mentioned SRs. Based on this, the staff has requested licensees seeking to adopt this TS SR language to provide a detailed technical justification, with examples of when this option may be used, for keeping the allowance to credit portions of these Surveillances. If justification cannot be provided, the NRC staff requests that the following statement be removed from the Notes contained in Improved Standard TS SRs 3.8.4.3 and 3.8.6.6:

However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced.