

TSTF

TECHNICAL SPECIFICATIONS TASK FORCE
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U.S. Nuclear Regulatory Commission
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SUBJECT: Technical Specification Task Force (TSTF) Response to the June 20, 2011 Federal Register Notice, "Notice of Opportunity for Public Comment on the Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-510, Revision 2, 'Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection'," **Docket ID NRC-2011-0136**

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject Federal Register Notice on TSTF-510, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection."

Should you have any questions, please do not hesitate to contact us.

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E-RIDS = ADM-03

SUNSI Review Complete

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Technical Specification Task Force (TSTF) Response to the June 20, 2011 Federal Register Notice, "Notice of Opportunity for Public Comment on the Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-510, Revision 2, 'Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection'," Docket ID NRC-2011-0136

1. The model Safety Evaluation, Section 3.9, Page 11, the section titled, "Proposed Change," contains an inconsistency with TSTF-510, Revision 2. The first sentence in the model Safety Evaluation states:

"After the first refueling outage following SG installation, inspect each SG at least every 72 effective full power months or at least every other refueling outage (whichever results in more frequent inspections)." (Emphasis added.)

TSTF-510, Revision 2, states:

"After the first refueling outage following SG installation, inspect each SG at least every 72 effective full power months or at least every third refueling outage (whichever results in more frequent inspections)." (Emphasis added.)

The model Safety Evaluation should be revised to be consistent with TSTF-510, Revision 2.

Note that the model Safety Evaluation correctly reflects the TSTF-510, Revision 2, requirements in the "Assessment" section (Page 12, second paragraph):

"Under the proposed changes to paragraph 5.5.9.d.2, the required minimum inspection frequency for alloy 690 TT (every 72 EFPM or every third refueling outage (whichever is less)) would remain materially unchanged."

2. The model Safety Evaluation, Section 3.9, Page 11, the section titled, "Proposed Change," contains an inconsistency with TSTF-510, Revision 2. The second sentence in the model Safety Evaluation states:

"In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, and c below." (Emphasis added.)

TSTF-510, Revision 2, states:

"In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, c and d below." (Emphasis added.)

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The quoted paragraph in the proposed Technical Specifications is followed by Items a through d. The model Safety Evaluation should be revised to be consistent with TSTF 510, Revision 2.

3. The model Safety Evaluation, Section 3.11, "Specification 5.6.7, 'Steam Generator Inspection Report'," Page 14, discusses the elimination of the word "Active" from Item b but does not discuss the elimination of the word "active" in Item e, as shown in TSTF-510, Revision 2. The justification for the elimination of the word "active" is the same for both Item b and Item e.

The model Safety Evaluation should be revised to discuss the elimination of the word "active" from Specification 5.6.7, Item e.