

November 14, 2011

TSTF-11-19
PROJ0753

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Proposed Model Application for TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)"

REFERENCE: Letter from TSTF to U.S. NRC, "Response to NRC Request for Additional Information Regarding TSTF-432, Revision 0, 'Change in Technical Specifications End States (WCAP-16294)'," dated November 29, 2010.

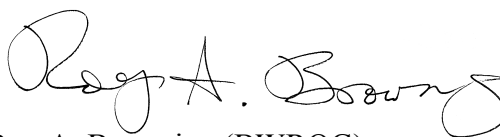
Dear Sir or Madam:

In the referenced letter, the TSTF submitted Revision 1 of TSTF-432, "Change in Technical Specifications End States (WCAP-16294)." Subsequent to the submittal of TSTF-432, the TSTF agreed to provide proposed model applications for all TSTF Travelers. Attached for NRC use is the TSTF's proposed model application for TSTF-432.

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




Norman J. Stringfellow (PWROG/W)



Roy A. Browning (BWROG)



William J. Steelman (PWROG/CE)



Wendy E. Croft (PWROG/B&W)

Enclosure

cc: Robert Elliott, Technical Specifications Branch, NRC
Michelle Honcharik, Licensing Processes Branch, NRC

PROPOSED MODEL APPLICATION FOR PLANT-SPECIFIC ADOPTION OF TSTF-432, REVISION 1, "CHANGE IN TECHNICAL SPECIFICATIONS END STATES (WCAP-16294)"

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

SUBJECT: [PLANT]
DOCKET NO. 50-[XXX]
LICENSE AMENDMENT REQUEST FOR ADOPTION OF TECHNICAL SPECIFICATION TASK FORCE TRAVELER TSTF-432 REVISION 1, "CHANGE IN TECHNICAL SPECIFICATIONS END STATES (WCAP-16294)"

In accordance with the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), [LICENSEE] is submitting a request for an amendment to the Technical Specifications (TS) for [PLANT NAME].

The proposed amendment would modify TS to risk-inform requirements regarding selected Required Action End States.

- Attachment 1 provides an evaluation of the proposed change.
- Attachment 2 provides markup pages of existing TS and TS Bases to show the proposed change.
- Attachment 3 provides revised (clean) TS pages.

[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)(1), "Notice for Public Comment," a copy of this application, with attachments, including the analysis about the issue of no significant hazards consideration using the standards in 10 CFR 50.92 is being provided to the Commission in accordance with the distribution requirements in 10 CFR 50.4.

In accordance with 10 CFR 50.91(b)(1), "Notice for Public Comment; State Consultation," a copy of this application and its reasoned analysis about no significant hazards considerations is being provided to the designated [STATE] Official.

I declare [or certify, verify, state] under penalty of perjury that the foregoing is true and correct.

Executed on [date] [Signature]

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

Sincerely,

[Name, Title]

Attachments: 1. Evaluation of the Proposed Change
2. Proposed Technical Specification and Bases Revisions (Mark-Up)
3. Revised Technical Specification Pages

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

ATTACHMENT 1 EVALUATION OF PROPOSED CHANGE

License Amendment Request for Adoption of TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)"

1.0 DESCRIPTION

The proposed amendment would modify technical specifications to risk-inform requirements regarding selected Required Action End States. The changes are consistent with Technical Specification Task Force (TSTF) Standard Technical Specification (STS) Change Traveler TSTF-432 Revision 1, "Change in Technical Specifications End States (WCAP-16294)." The availability of this TS improvement was announced in the *Federal Register* on [DATE] ([] FR []) as part of the consolidated line item improvement process (CLIP).

2.0 ASSESSMENT

2.1 Applicability of Topical Report, TSTF-432, and Published Safety Evaluation

[LICENSEE] has reviewed Westinghouse Topical Report (TR) WCAP-16294 (Reference 1), the Nuclear Regulatory Commission (NRC) safety evaluation for WCAP-16294 (Reference 2), TSTF-432, Revision 1 (Reference 3), and the NRC model safety evaluation (Reference 4). [LICENSEE] has concluded that the technical bases described in the Westinghouse topical report and TSTF-432, as well as the associated safety evaluations prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and support incorporation of this amendment request into the [PLANT] TS.

2.2 Optional Changes and Variations

[LICENSEE] [is / is not] proposing any variations or deviations from the Westinghouse topical report, the TS changes described in the TSTF-432 Revision 1, or the NRC staff's model safety evaluation published in the *Federal Register* on [DATE] ([] FR []) as part of the CLIP Notice of Availability. [Discuss any differences with TR WCAP-16294-A or TSTF-432, Revision 1, and the effect of any changes on the NRC staff model SE.]

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

[LICENSEE] has evaluated the proposed changes to the TS using the criteria in 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration.

Description of Amendment Request: The proposed amendment would modify TS to risk-inform requirements regarding selected Required Action End States.

As required by 10 CFR 50.91(a), the [LICENSEE] analysis of the issue of no significant hazards consideration is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change modifies the end state (e.g., mode or other specified condition) which the Required Actions specify must be entered if compliance with the Limiting Conditions for Operation (LCO) is not restored. The requested Technical Specifications (TS) permit an end state of Mode 4 rather than an end state of Mode 5 contained in the current TS. In some cases, other Conditions and Required Actions are revised to implement the proposed change. Required Actions are not an initiator of any accident previously evaluated. Therefore, the proposed change does not affect the probability of any accident previously evaluated. The affected systems continued to be required to be operable by the TS and the Completion Times specified in the TS to restore equipment to operable status or take other remedial Actions remain unchanged. WCAP-16294-NP-A, Rev. 1, "Risk-Informed Evaluation of Changes to Tech Spec Required Action Endstates for Westinghouse NSSS PWRs," demonstrates that the proposed change does not significantly increase the consequences of any accident previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change modifies the end state (e.g., mode or other specified condition) which the Required Actions specify must be entered if compliance with the LCO is not restored. In some cases, other Conditions and Required Actions are revised to implement the proposed change. The change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the change does not impose any new requirements. The change does not alter assumptions made in the safety analysis.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change modifies the end state (e.g., mode or other specified condition) which the Required Actions specify must be entered if compliance with the LCO is not restored. In some cases, other Conditions and Required Actions are revised to implement the proposed change. Remaining within the Applicability of the LCO is acceptable because WCAP-16294-NP-A demonstrates that the plant risk in MODE 4 is similar to or lower than MODE 5. As a result, no margin of safety is significantly affected.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

3.2 Applicable Regulatory Requirements/Criteria

A description of the proposed TS change and its relationship to applicable regulatory requirements were published in the *Federal Register* Notice of Availability on [DATE] ([] FR []). [LICENSEE] has reviewed the NRC staff's model SE referenced in the CLIIP Notice of Availability and concluded that the regulatory evaluation section is applicable to [PLANT].

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR Part 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

5.0 REFERENCES

1. WCAP-16294-NP-A, Revision 1, "Risk-Informed Evaluation of Changes to Technical Specification Required Endstates for Westinghouse NSSS [Nuclear Steam Supply

System] PWRs [Pressurized Water Reactors], June 2010 (NRC ADAMS Accession Number ML052620374)

2. Final Safety Evaluation for NEI Topical Report WCAP-16294-NP, Revision 0, "Risk-Informed Evaluation of Changes to Technical Specification Required Endstates for Westinghouse NSSS [Nuclear Steam Supply System] PWRs [Pressurized Water Reactors]," August 2005 (NRC ADAMS Accession Number ML100770146)
3. TSTF-432, Revision 1, "Change in Technical Specifications End States WCAP-16294" dated November 29, 2010 (NRC ADAMS Accession number ML103360003)
4. Federal Register, ([] FR []), "Notice of Availability of the Models for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)" [DATE].