

PWR Owners Group-NRC Meeting



Tech Spec Parameter Relocation – Phase 1 (PA-LSC-0707)

November 18, 2011

PWR Owners Group-NRC Meeting

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- Purpose of the Meeting
- Purpose of the PWROG Program
- Background
- Need for and Benefits of the Change
- Examples of NUREG-1431 Parameters that Could be Relocated
- Summary and Conclusions
- Comments and Open Discussion

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Purpose of the Meeting

- Discuss with the NRC Staff the PWROG Program that Proposes to Relocate Additional Parameters out of the Technical Specifications to the COLR, Bases, and PTLR
- Obtain Staff feedback

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Purpose of the PWROG Program

- Identify the Parameters Included in the Technical Specifications that could be Relocated to the COLR, Bases, and PTLR
- Identify the NRC Approved Methodologies for Determining those Parameters
- Provide Justification for Relocating Parameters to the COLR, PTLR, and Bases

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Background

- Generic Letter 88-16, “Removal of Cycle-Specific Parameter Limits from Technical Specifications,” Relocated Parameters that Changed on a Cycle-Specific Basis to a COLR
- Generic Letter 93-08, “Relocation of Technical Specification Tables of Instrument Response Time Limits,” Relocated the RTS and ESFAS Response Times
- Generic Letter 96-03, “Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits,” Relocated the P-T Limit and LTOP PORV Setpoints to a PTLR

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Background (cont.)

- TSTF-339-A, Rev. 2, “Relocate TS Parameters to COLR,” Relocated the Reactor Core Safety Limits Figure, OPDT and OTDT lead lags and time constants, and RCS Pressure, Temperature and Flow Limits to a COLR
- TSTF-425-A, Rev. 3, “Relocate Surveillance Frequencies to Licensee Control- RITSTF Initiative 5b,” Relocated the Periodic Surveillance Frequencies to a SFCP

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Background (cont.)

- TSTF-491-A, Rev. 2, Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications,” Relocated the Main Steam and Main Feedwater Valve Closure Times
- TSTF-493-A, Rev. 4, “Clarify Application of Setpoint Methodology for LSSS Functions,” Option B, Relocated the Setpoints in Chapter 3 of the Technical Specifications to a SCP
- TSTF-501-A, Rev. 1, “Relocate Stored Fuel Oil Volume Values to Licensee Control,” replaced the DG fuel oil and lube oil values with a requirement to have a [7] day supply

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Need for and Benefits of the Change

- LARs are Submitted that Request Changes to Individual Parameters in the Technical Specifications
 - Accumulator Pressure
 - RWST Volume
- If these Parameters were Relocated out of the Technical Specifications, they could be Changed without NRC Review and Approval
- Reduce the Number of LARs Submitted
 - Reduce the Burden on Licensees in the Preparation of LARs
 - Reduce the Burden on the Staff to Review the LARs

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Examples of NUREG-1431 Parameters that Could be Relocated

- NUREGs-1430 and 1432 Contain Similar Parameters that Could be Relocated

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TECH SPEC	PARAMETER(S)	JUSTIFICATION/NOTES
3.1.2 Core Reactivity	± 1% $\Delta K/K$ range for measure core reactivity	Expand the COLR to include the measured reactivity predicted values and acceptable range of ± 1% $\Delta K/K$.
3.1.3 MTC	upper limit shall be [\leq [] $\Delta k/k^\circ F$ at hot zero power] [that specified in Figure 3.1.3-1]	Expand the COLR to include the upper limit for MTC.
3.1.4 Rod Group Alignment Limits	± 12 step rod position requirement and Rod Drop Time	Expand the COLR to include both of these parameters
3.1.7 Rod position Indication	SR 3.1.7.1 ± 12 step rod position requirement (DRPI vs. demand indication)	Expand to COLR to include this limit

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TECH SPEC	PARAMETER(S)	JUSTIFICATION/NOTES
3.4.5 RCS Loops – MODE 3	SR 3.4.5.2 Verify steam generator secondary side water levels are \geq [17]% for required RCS loops.	<p>Operability information. The SG is operable if the level is \geq 17%.</p> <p>Operability is typically defined in the Bases.</p> <p>Move to Bases, controlled by the Bases Control Program.</p>
3.4.6 RCS Loops – MODE 4	<p>RCP start limit - secondary side water temperature of each steam generator (SG) is \leq [50]$^{\circ}$F above each of the RCS cold leg temperatures.</p> <p>And</p> <p>SR 3.4.6.2 Verify SG secondary side water levels are \geq [17]% for required RCS loops.</p>	<p>Expand the PTLR to include the RCP start limit of the secondary side SG water temperature limit \leq [50] $^{\circ}$F.</p> <p>The SG is operable if the level is \geq 17%.</p> <p>Operability is typically defined in the Bases.</p> <p>Move to Bases, controlled by the Bases Control Program.</p>

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TECH SPEC	PARAMETER(S)	JUSTIFICATION/NOTES
3.4.12 Low Temperature Overpressure Protection (LTOP) System	<p>Two residual heat removal (RHR) suction relief valves with setpoints $\geq [436.5]$ psig and $\leq [463.5]$ psig,]</p> <p>RCS vent of $\geq [2.07]$ square inches</p>	<p>Expand the PTLR to include the RHR suction relief valve setpoints and RCS vent size.</p> <p>Note, there is currently no generic NRC approved methodology for calculating the RHR suction relief valve setpoints and RCS vent size.</p>
3.4.18 RCS Isolated Loop Startup	<p>The cold leg isolation valve closed if the cold leg temperature of the isolated loop is $> [20]^{\circ}\text{F}$ below the highest cold leg temperature of the operating loops</p> <p>SR 3.4.18.1 (...cold leg temperature of the isolated loop is $> [20]^{\circ}\text{F}$ below...).</p>	<p>Expand the COLR to include the cold leg temperature limit $[20]^{\circ}\text{F}$ for an isolated RCS loop</p>

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Summary and Conclusions

- The Precedent exists for Relocating Parameters out of the Technical Specifications
 - GL 88-16
 - GL 93-08
 - GL 96-03
 - TSTF-339
 - TSTF-425
 - TSTF-491
 - TSTF-493, Option B
 - TSTF-501

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Summary and Conclusions (cont.)

- This Program Would Extend the Concept of Relocating Additional Parameters Consistent with the Precedent Above
- Reduce the Number of LARs Submitted
 - Reduce the Burden on Licensees in the Preparation of LARs
 - Reduce the Burden on the Staff to Review the LARs

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- Comments and Open Discussion