

TSTF

TECHNICAL SPECIFICATIONS TASK FORCE
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SUBJECT: Technical Specification Task Force (TSTF) Response to the November 28, 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-505, Revision 1, 'Provide Risk-Informed Extended Completion Times—RITSTF Initiative 4B'," **Docket ID NRC-2011-0277**

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject Federal Register Notice on TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times—RITSTF Initiative 4B."

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

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Enclosure

cc: Robert Elliott, Technical Specifications Branch, NRC
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SUNSI Review Complete

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Technical Specification Task Force (TSTF) Response to the November 28, 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-505, Revision 1, 'Provide Risk-Informed Extended Completion Times—RITSTF Initiative 4B'," Docket ID NRC-2011-0277

1. Section 3.4 of the model Safety Evaluation states:

[3.4 Evaluation of Plant-Specific Changes]

{NOTE: Under certain conditions specified in NEI 06-09 it is acceptable to operate for short periods of time with all trains of equipment, which are required by a TS LCO, inoperable, provided that one or more trains are considered to be PRA functional. The number and identity of instrumentation and control (I&C) channels (or functions) required to be PRA functional is highly dependent on the specific plant and associated equipment design. Since NEI 06-09 did not address the required actions related to I&C, licensees choosing to adopt these specific changes may need to provide plant-specific implementation guidance for NRC staff review. If these changes were included in the LAR, insert NRC staff technical evaluation here. Be sure to modify Regulatory Evaluation Section and Conclusions Section appropriately.}

The section is unnecessary and misleading and should be eliminated.

- a. This additional requirement to provide plant-specific I&C implementation guidance for NRC staff review is unnecessary as it already exists for all proposed changes to the Technical Specifications, including those related to I&C:
 - Enclosure 1 of the model application requires licensees to list each TS Required Action to which the Risk Informed Completion Time (RICT) Program may be applied and, for each Required Action, describe the corresponding structure, system, or component (SSC) and the associated function modeled in the Probabilistic Risk Assessment (PRA), and
 - Enclosure 10 of the model application requires a licensees to provide a description of the implementing programs and procedures regarding the plant staff responsibilities for the RICT Program implementation.
- b. The section is misleading and incorrectly implies that I&C requirements are somehow unique and should be treated differently than other systems. This is not consistent with NEI 06-09, "Risk-Informed Technical Specifications Initiative 4B, Risk-Managed Technical Specifications (RMTS) Guidelines,":

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- The proposed Required Actions that are applicable when all trains of equipment are inoperable provided that one or more trains are considered to be PRA functional are no more or less plant-specific than any other changes proposed by TSTF-505 or that will be proposed by a licensee adopting TSTF-505.
- NEI 06-09 does not discuss system-specific aspects of any structures, systems, or components and recognizes that all evaluations of RICT and PRA functionality are highly dependent on the specific plant and equipment design. Requirements associated with I&C are treated no differently under NEI 06-09 than other systems.

In summary, the paragraph implies a weakness in NEI 06-09 when none exists and the need for additional information to be provided by the licensee when none is needed. The section should be removed.

2. The TSTF suggests the following editorial improvements:

- a. The use of NEI 06-09 is required by the proposed Technical Specifications RICT Program. Therefore, it is not correct to refer to a commitment to NEI 06-09, as the term commitment has a specific regulatory meaning that is not applicable in this circumstance. In the model Safety Evaluation, Section 3.2.4.1.6, Page 14, the following sentence should be revised as shown by removing the words that have been struck through and inserting the word in italics:

"The licensee has ~~committed to~~ *incorporated* NEI 06-09, Revision 0, in the RICT Program of TS [5.5.18], and therefore calculates the RICT consistently with its criteria, and assesses the RICT Program to assure any risk increases are small per the guidance of RG 1.174."

- b. Not all of the new Conditions and Required Actions which permit application of a RICT when multiple trains are inoperable currently require entry into LCO 3.0.3. Therefore, in the model Safety Evaluation, Section 3.1, Page 7, last paragraph, the following sentence should be revised as shown by the inserted word in italics:

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"Under the existing TS, such configurations would *typically* result in applicability of LCO 3.0.3 and an immediate reactor shutdown."

- c. NEI 06-09, Revision 0, Section 2.3.1, Step 11, makes clear that the concept of PRA functionality can be applied and a Risk Informed Completion Time (RICT) can be calculated when a single train or subsystem of a structure, system, or component can be shown to have PRA functionality. Therefore, in the model Safety Evaluation, Section 3.1, Page 7, last paragraph, the following sentence should be clarified as shown by the inserted word in italics:

"In accordance with NEI 06-09, the use of a RICT when all trains of a TS system are inoperable is restricted to conditions in which *at least one train of* the TS system retains PRA functionality and the CRMP can discern which TS functions are available and which are failed due to the inoperability."