

June 13, 2012

Technical Specifications Task Force (TSTF)
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: ACCEPTANCE FOR REVIEW AND REQUEST FOR ADDITIONAL
INFORMATION REGARDING TRAVELER TSTF-523, REVISION 1, "GENERIC
LETTER 2008-01, MANAGING GAS ACCUMULATION" (TAC NO. ME8308)

Dear Members of the TSTF:

By letter dated March 29, 2012 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12089A356), you submitted to the U.S. Nuclear Regulatory Commission (NRC) for review and approval Traveler TSTF-523, Revision 1, "Generic Letter 2008-01, Managing Gas Accumulation." Your submission noted that the review of this Traveler is exempt from review fees in accordance to Title 10 of the *Code of Federal Regulations* Part 170 and the letter from J. E. Dyer (NRC) to the TSTF dated August 18, 2010 (ADAMS Accession No. ML102300233).

The NRC staff has completed a preliminary review of your submission and determined it is sufficiently complete and appropriate to initiate a more comprehensive review.

Since completion of the preliminary acceptance review, the NRC staff has begun the comprehensive review and determined that additional information is needed to complete the comprehensive review. Enclosed is the NRC staff's request for additional information.

The TSTF-523, Revision 1, review schedule has been planned as shown in the table below. If circumstances should lead to anticipated or actual schedule slippage, the causing party should promptly notify and coordinate with the other party. Early completion of a milestone would not require further coordination.

MILESTONE	SCHEDULE DATE
Requests for Additional Information (RAIs)	June 22, 2012
RAI Response from TSTF	September 21, 2012
Issue Notice for Comment on Model Safety Evaluation and Model Application	February 8, 2013
Issue Notice of Availability for Model Safety Evaluation and Model Application	May 29, 2013

TSTF

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If you have any questions, please contact me at (301) 415-1774 or via e-mail to Michelle.Honcharik@nrc.gov.

Sincerely,

/RA/

Michelle C. Honcharik, Sr. Project Manager
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 753

Enclosure:
As stated

cc w/ encl: See next page

TSTF

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If you have any questions, please contact me at (301) 415-1774 or via e-mail to Michelle.Honcharik@nrc.gov.

Sincerely,

/RA/

Michelle C. Honcharik, Sr. Project Manager
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 753

Enclosure:
As stated

cc w/ encl: See next page

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OFFICE	PLPB/PM	PLPB/LA	STSB/BC	SRXB/BC	PLPB/BC
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DATE	6/13/2012	6/12/2012	6/13/2012	6/13/2012	6/15/2012
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REQUEST FOR ADDITIONAL INFORMATION

TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-523, REVISION 1

"GENERIC LETTER 2008-01, MANAGING GAS ACCUMULATION"

On March 29, 2012, the Technical Specifications Task Force (TSTF) submitted Revision 1 of TSTF-523 for U.S. Nuclear Regulatory Commission (NRC) review. The purpose of the Traveler is to update gas void considerations in NUREGs 1430 - 1434, the Standard Technical Specifications that will provide a basis for correction of inadequate technical specifications (TSs). This is to be accomplished while providing improved flexibility in surveillance requirements (SRs) by incorporation of a licensee-controlled document, the Surveillance Frequency Control Program (SFCP). This is the principal change associated with TSTF-523.

The NRC staff has determined that the overall approach described in TSTF-523 is acceptable, but additional information is needed and some details must be corrected. Please provide your plans for addressing the following items or, if addressing the item is straightforward, then provide your response:

1. Page 8 of TSTF-523, Revision 1, contains a brief discussion of the SFCP and a brief justification for applying the SFCP to the associated surveillance requirements (SRs). The staff requires a more detailed justification for the application of the SFCP to SRs associated with gas accumulation, given the unique phenomena involved.
2. Startup from an outage is permitted with gas voids in the subject systems. This is not consistent with the water-solid condition required by the current licensing basis (CLB) for most plant safety related systems and associated supporting systems that contain water.
3. There are many references to calculations to establish acceptable void criteria or to establish operability but none regarding how this may be acceptably accomplished. The Traveler should be supplemented to discuss how licensees will establish acceptable void criteria.
4. Omission of "Verify the containment spray piping is full of water to the [100] ft level in the containment spray header" from NUREG-1432 TS SR 3.6.6.4 is not acceptably justified.
5. Definition of "accessible locations" must be provided.
6. The technical discussion does not acceptably address voiding issues associated with exceeding the saturation temperature in residual heat removal systems.

ENCLOSURE

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