

July 31, 2013

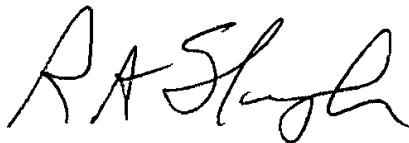
TSTF-13-11  
PROJ0753Attn: Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001SUBJECT: TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation" Corrected  
Pages

TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation," was transmitted to the NRC for review on February 21, 2013 (ADAMS Accession Number ML13053A075). We have determined that Attachment 1, "Model Application," of the Traveler was not revised to reflect the new revision number.

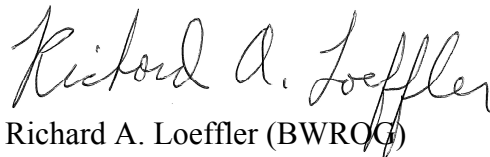
We also discovered an incorrect topic heading on Page 9 of the justification. The topic heading states "NUREG-1430" and should state "NUREG-1431."

The TSTF has revised TSTF-523 to correct these errors. Attached is a replacement page for the justification and a revised Attachment 1 to TSTF-523, Revision 2. The locations where changes are made are highlighted.

Should you have any questions, please contact us.



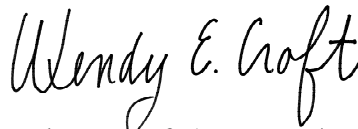
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Enclosure

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

of gas accumulation, the procedural controls governing system operation, and operating experience. Note that SR 3.0.1 states, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO" (emphasis added).

Some LCOs only require one train or loop of DHR/RHR/SDC to be Operable at a given time. The proposed SR for those TS state "Verify the required [system] [loop/train/subsystem] locations..." In the ISTS, the term "required" means "required by the LCO." The word "required" is added as a convention to avoid confusion since SRs are not applicable to equipment that is not required to be Operable. Corresponding changes are made to the Bases.

A Note is added to the gas accumulation SR for the RHR system LCOs that are initially applicable during a plant shutdown. These are:

- LCO 3.4.6, "RCS Loops – MODE 4" for PWR designs;
- LCO 3.4.8, "RHR Shutdown Cooling System - Hot Shutdown" for BWR/4 designs; and
- LCO 3.4.9, "RHR Shutdown Cooling System - Hot Shutdown" for BWR/6 designs.

The Note states that the SR does not have to be performed until 12 hours after entering the Applicability of the LCO (Mode 4 for PWRs and Mode 3 with reactor steam dome pressure < [the RHR cut in permissive pressure] for BWRs). Surveillances are normally performed prior to entering the Applicability. During a rapid shutdown, there may be insufficient time to verify all susceptible locations in the RHR System before entering the Applicability. The Note provides a limited time to perform the Surveillance after entering the Applicability of the LCO; however, under the ISTS usage rules (ISTS Section 1.4), the requirement to manage gas accumulation is not affected. Licensees must have confidence that the SR can be met or the LCO must be declared not met.

A Note is added to SRs that require verification that manual valves are in the correct position. For system vent flow paths, the correct position is closed. The Note allows the SR to not be met for system vent flow paths opened under administrative control, to allow system venting and performance of the proposed gas accumulation SR.

The affected SRs are:

NUREG-1430

SR 3.5.2.2, "ECCS - Operating"

SR 3.6.6.1, "Containment Spray and Cooling Systems"

NUREG-1431

SR 3.5.2.2, "ECCS - Operating"

SR 3.6.6A.1, "Containment Spray and Cooling Systems"

SR 3.6.6B.1, "Containment Spray and Cooling Systems"

SR 3.6.6C.1, "Containment Spray System"

SR 3.6.6D.1, "Quench Spray (QS) System"

**Attachment 1**  
**Model Application**

[DATE]

10 CFR 50.90

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

SUBJECT: PLANT NAME  
DOCKET NO. 50-[xxx]  
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO  
ADOPT TSTF-523, "GENERIC LETTER 2008-01, MANAGING GAS  
ACCUMULATION," USING THE CONSOLIDATED LINE ITEM  
IMPROVEMENT PROCESS

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, [LICENSEE] is submitting a request for an amendment to the Technical Specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed amendment would modify TS requirements to address Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as described in TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation." [LICENSEE committed to submit this proposed change in [reference letter].]

Attachment 1 provides a description and assessment of the proposed change. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides existing TS Bases pages marked to show the proposed change. Changes to the existing TS Bases, consistent with the technical and regulatory analyses, will be implemented under the Technical Specification Bases Control Program. They are provided in Attachment 4 for information only.

Approval of the proposed amendment is requested by [date]. Once approved, the amendment shall be implemented within [ ] days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated [STATE] Official.

[In accordance with 10 CFR 50.30(b), a license amendment request must be executed in a signed original under oath or affirmation. This can be accomplished by attaching a notarized affidavit confirming the signature authority of the signatory, or by including the following statement in the cover letter: "I declare under penalty of perjury that the foregoing is true and correct. Executed on (date)." The alternative statement is pursuant to 28 USC 1746. It does not require notarization.]

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

Sincerely,

[Name, Title]

Attachments:

1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-Up)
3. Revised Technical Specification Pages
4. Proposed Technical Specification Bases Changes (Mark-Up) (For information only)

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

## ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

### 1.0 DESCRIPTION

The proposed change revises or adds Surveillance Requirements to verify that the system locations susceptible gas accumulation are sufficiently filled with water and to provide allowances which permit performance of the verification. The changes are being made to address the concerns discussed in Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems."

The proposed amendment is consistent with TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

### 2.0 ASSESSMENT

#### 2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the model safety evaluation dated [DATE] as part of the Federal Register Notice of Availability. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-523. [As described in the subsequent paragraphs, ] [LICENSEE] has concluded that the justifications presented in the TSTF-523 proposal and the model safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] TS.

#### 2.2 Optional Changes and Variations

[LICENSEE is not proposing any variations or deviations from the TS changes described in the TSTF-523, Revision 2, or the applicable parts of the NRC staff's model safety evaluation dated [DATE].] [LICENSEE is proposing the following variations from the TS changes described in the TSTF-523, Revision 2, or the applicable parts of the NRC staff's model safety evaluation dated [DATE].]

[The [PLANT] TS utilize different [numbering][and][titles] than the Standard Technical Specifications on which TSTF-523 was based. Specifically, [describe differences between the plant-specific TS numbering and/or titles and the TSTF-523 numbering and titles.] These differences are administrative and do not affect the applicability of TSTF-523 to the [PLANT] TS.]

[The [PLANT] TS does not have [the / some of the] existing Surveillance Requirements revised by TSTF-523. This difference does not affect the applicability of TSTF-523 to the [PLANT] TS.]

### 3.0 REGULATORY ANALYSIS

#### 3.1 No Significant Hazards Consideration Determination

[LICENSEE] requests adoption of TSTF-523, Rev. 1, "Generic Letter 2008-01, Managing Gas Accumulation," which is an approved change to the standard technical specifications (STS), into the [PLANT NAME, UNIT NOS] technical specifications (TS). The proposed change revises or adds Surveillance Requirements to verify that the system locations susceptible gas accumulation are sufficiently filled with water and to provide allowances which permit performance of the verification.

[LICENSEE] has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed 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 revises or adds Surveillance Requirement(s) (SRs) that require verification that the Emergency Core Cooling System (ECCS), the [Decay Heat Removal (DHR) / Residual Heat Removal (RHR) / Shutdown Cooling (SDC)] System, [and] the Containment Spray (CS) System, [and the Reactor Core Isolation Cooling (RCIC) System] are not rendered inoperable due to accumulated gas and to provide allowances which permit performance of the revised verification. Gas accumulation in the subject systems is not an initiator of any accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased. The proposed SRs ensure that the subject systems continue to be capable to perform their assumed safety function and are not rendered inoperable due to gas accumulation. Thus, the consequences of any accident previously evaluated are not significantly increased.

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 revises or adds SRs that require verification that the ECCS, the [DHR / RHR / SDC] System, [and] the CS System, [and the RCIC System] are not rendered inoperable due to accumulated gas and to provide allowances which permit performance of the revised verification. The proposed 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 proposed change does not impose any new or different requirements that could initiate an

accident. The proposed change does not alter assumptions made in the safety analysis and is consistent with the safety analysis assumptions.

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 revises or adds SRs that require verification that the ECCS, the [DHR / RHR / SDC] System, [and] the CS System, [and the RCIC System] are not rendered inoperable due to accumulated gas and to provide allowances which permit performance of the revised verification. The proposed change adds new requirements to manage gas accumulation in order to ensure the subject systems are capable of performing their assumed safety functions. The proposed SRs are more comprehensive than the current SRs and will ensure that the assumptions of the safety analysis are protected. The proposed change does not adversely affect any current plant safety margins or the reliability of the equipment assumed in the safety analysis. Therefore, there are no changes being made to any safety analysis assumptions, safety limits or limiting safety system settings that would adversely affect plant safety as a result of the proposed change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, [LICENSEE] concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

#### 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 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 a significant increase in the amounts of any effluent 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.