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SUBJECT: Technical Specification Task Force (TSTF) Response to the August 2, 2013  
Federal Register Notice, "Proposed Safety Evaluation for Plant-Specific  
Technical Specifications Task Force Traveler, 'Generic Letter 2008-01,  
Managing Gas Accumulation',"  
**Docket ID NRC-2013-0173**

Enclosed for NRC consideration are comments prepared by the Technical Specification Task  
Force (TSTF) on the subject Federal Register Notice regarding TSTF-523, Revision 2, "Generic  
Letter 2008-01, Managing Gas Accumulation."

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

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Enclosure

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FRIDS = ADM-03

5055E Review complete  
Template = ADM-013

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**Technical Specification Task Force (TSTF) Response to the August 2, 2013 Federal Register Notice, "Proposed Safety Evaluation for Plant-Specific Technical Specifications Task Force Traveler, 'Generic Letter 2008-01, Managing Gas Accumulation',"**  
**Docket ID NRC-2013-0173**

1. Section 1.0, "Introduction," of the Proposed Model Safety Evaluation, third paragraph, should be revised to state that reactor core isolation cooling (RCIC) system SR is revised and that the phrase is optional depending on plant design. The current paragraph states that a new SR is added. The revised paragraph would state (insertions are in italics, deletions are struck through):

"The proposed change would revise SRs related to gas accumulation for the emergency core cooling system (ECCS) [*and reactor core isolation cooling (RCIC) system*], and add new SRs related to gas accumulation for the [decay heat removal (DHR), residual heat removal (RHR), and shutdown cooling (SDC), *and* containment spray (CS), ~~and reactor core isolation cooling (RCIC)~~] systems. TS Bases changes associated with these SRs would also be made."

2. Section 2.2, "Technical Specifications Changes," of the Proposed Model Safety Evaluation, first paragraph, should be revised to clarify that the affected Technical Specifications may vary by plant. The revised paragraph would state (insertions are in italics, deletions are struck through):

"{NOTE: Chose one of the following paragraphs, depending on the plant vendor/type, *and revise as necessary to reflect the plant specific changes.*}"

3. Section 2.2, "Technical Specifications Changes," of the Proposed Model Safety Evaluation, third and fourth paragraphs, should be revised to reflect that plant-specific Technical Specifications only contain a single version of lettered specification options in the Standard Technical Specifications. For example, plant Technical Specifications would contain Specification 3.6.6, "Containment Spray and Cooling Systems," while the Standard Technical Specifications contain 5 options: 3.6.6A, "Containment Spray and Cooling Systems (Atmospheric and Dual)," 3.6.6B, "Containment Spray and Cooling Systems (Atmospheric and Dual)," 3.6.6C, "Containment Spray System (Ice Condenser)," 3.6.6D, "Quench Spray System (Subatmospheric)," 3.6.6E, "Recirculation Spray System (Subatmospheric)." This difference between the Standard Technical Specifications and plant-specific Technical Specifications is correctly represented in Section 3.0, "Technical Evaluation," of the Proposed Model Safety Evaluation, fourth and fifth paragraphs, which begin "{For Westinghouse Plants}" and "{For Combustion Engineering Plants}," respectively.

**Technical Specification Task Force (TSTF) Response to the August 2, 2013 Federal Register Notice, "Proposed Safety Evaluation for Plant-Specific Technical Specifications Task Force Traveler, 'Generic Letter 2008-01, Managing Gas Accumulation'," Docket ID NRC-2013-0173**

4. Section 2.3, "Regulatory Review," of the Proposed Model Safety Evaluation, sixth through eighth paragraphs, refers to Revision 3 of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition" (SRP), Sections 6.2.2, 6.3, and 5.4.7, respectively. These paragraphs should be removed from the Proposed Model Safety Evaluation. The SRP is not referenced in TSTF-523 or in NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," which is the regulatory basis for the proposed Technical Specifications changes. Few, if any, licensee's current licensing basis includes these SRP sections (revised in 2007 and 2010), but the model application requires a licensee to confirm that the Proposed Model Safety Evaluation is applicable. Inclusion of these SRP references could result in the majority of licensees unnecessarily deviating from the Proposed Model Safety Evaluation and unwarranted additional review by the licensees and the NRC.

5. Section 3.0, "Technical Evaluation," of the Proposed Model Safety Evaluation, second paragraph, should be revised to clarify that the affected Technical Specifications may vary by plant. The revised paragraph would state (insertions are in italics, deletions are struck through):

"The NRC staff compared the proposed changes to the existing SRs, as well as the regulatory requirements of 10 CFR 50.36. {NOTE: Chose one of the following paragraphs, depending on the plant vendor/type *and revise as necessary to reflect the plant specific changes.*}"

6. Section 3.0, "Technical Evaluation," of the Proposed Model Safety Evaluation, tenth paragraph, should be revised to clarify the purpose of the proposed Surveillance Requirement Notes, consistent with the justification in TSTF-523, Revision 2. The revised paragraph would state (insertions are in italics, deletions are struck through):

"The language for the notes that allow the SRs to not be met for system vent flow paths opened under administrative control is necessary to *allow the licensee to credit administratively controlled manual action to close the system vent flow path in order to maintain system Operability during system venting and performance of the proposed gas accumulation SR. Therefore these notes are acceptable.*"