

**U.S. Nuclear Regulatory Commission Staff Disposition of Comments to *Federal Register*
Notice for Comment Technical Specifications Task Force Traveler TSTF-523, Revision 2,
“Generic Letter 2008-01, Managing Gas Accumulation”**

The proposed model safety evaluation (SE) of TSTF-523 was published for comment in the *Federal Register* on August 2, 2013 (78 FR 47010). Comments were received from an unknown author and from the Technical Specifications Task Force (TSTF).

The comment received from the unknown author was submitted on September 2, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13252A061). The NRC staff was unable to disposition this comment, because it was unrelated TSTF-523.

The comments from the TSTF were received on September 2, 2013 (ADAMS Accession No. ML13248A272). The changes recommended by the TSTF are listed below. The NRC staff agreed with all the recommended changes numbered 1, 2, 3, 5, and 6 and has incorporated them into the SE, with minor editorial revisions. Additions are in italics and deletions are struck through. The NRC staff did not agree with the recommended changes in comment number 4, but did make changes to address the TSTF's concerns.

1. Section 1.0, "Introduction," third paragraph:

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 The proposed change would also 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," first paragraph:

{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," third and fourth paragraphs:

Section 2.2, "Technical Specifications Changes," of the Proposed Model Safety Evaluation, third and fourth paragraphs, were revised to reflect that plant-specific Technical Specifications only contain a single version of lettered specification options in the Standard Technical Specifications.

4. Section 2.3, "Regulatory Review," of the Proposed Model Safety Evaluation, sixth through eighth paragraphs.

Comment number 4 was not incorporated as suggested. The Standard Review Plan (SRP) is included in the Regulatory Review section of the model SE because it is a document that the NRC staff uses to perform the regulatory review. Therefore, the NRC staff has left the reference to the SRP in the SE.

Changes were made to the paragraphs in the model SE which referred to the SRP, to ensure that licensees' would not be deviating from the model SE causing unwarranted additional reviews.

5. Section 3.0, "Technical Evaluation," second paragraph:

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," tenth paragraph:

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.