May 21, 2014

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

SUBJECT: ACCEPTANCE REVIEW OF AND REQUEST FOR PUBLIC MEETING ON PROPOSED TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TRAVELER TSTF-542, REVISION 0, "REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL" (TAC NO. MF3487)

Dear Members of the TSTF:

The purpose of this letter is to inform the TSTF that the U.S. Nuclear Regulatory Commission (NRC) staff acceptance review of TSTF-542, Revision 0, dated December 31, 2013 (Agencywide Documents Access and Management System Accession Number ML14002A112) is complete. TSTF-542 proposes standard technical specifications (STS) that would replace "operations with a potential for draining the reactor vessel" (OPDRVs) with requirements to control reactor pressure vessel water inventory to greater than the top of the active fuel safety limit.

During its acceptance review of TSTF-542, the NRC staff identified several concerns with the content of the proposed STS changes. As a general comment, contrary to the Title 10 of the *Code of Federal Regulations* Section 50.36(c)(2), Traveler TSTF-542 Action requirements do not require remediation of the plant conditions that caused the loss of inventory to occur; rather, timeliness goals are introduced to replenish the inventory. To establish defense-in-depth for preserving reactor core safety limits technical specification (TS) remedial measures should be two-fold, (1) remediate the plant conditions that caused the loss of inventory to occur and (2) replenish inventory. Specifically, the NRC staff identified the following concerns:

- Relocating instrumentation TS requirements to TS 3.5.2 is contrary to STS formatting conventions that have been in place for more than 36 years.

- The NRC staff does not agree with adding undefined terms, such as "capable of being established, isolated, or placed in operation" to STS. STS Limiting Conditions for Operation (LCOs) are built on a foundation that the various structures, systems, and components are required to be operable, in accordance with the STS definition section definition of Operability. For example, the action in proposed TS 3.5.2 Condition A restores operability of the required low pressure emergency core cooling system (ECCS) injection/spray. However, the actions in proposed TS 3.5.2 Condition C do not restore operability they only verify that the secondary containment boundary, secondary containment penetration flow path, and standby gas system are capable of being established, isolated, or placed in operation.

- The proposed Traveler uses a graded approach, based on the amount of inventory loss, which does not mitigate draining events that would result in fuel damage. Therefore, the graded approach does not provide reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner.

- The NRC staff does not agree with the changes to TS 3.3.5.1A/B, TS 3.3.6.1A/B, TS 3.3.8.2A/B, and TS 3.6.1.3 that are not specifically removing reference to OPDRVs, therefore, these changes will not be reviewed unless they are relevant to the reactor pressure vessel water inventory control concept. The proposed Traveler should contain only those changes that remove reference to OPDRVs.

- The Traveler should state the existing safety basis. Assumptions and conjecture should be removed.

- This Traveler proposes that a draining event with the reactor shutdown should be treated as an anticipated operational occurrence (AOO). However, the Traveler does not explain how the Standard Review Plan, Chapter 15.0, "Introduction Transient and Accident Analyses," accident acceptance criteria are met for an AOO, which could fall into a "decrease in reactor coolant inventory," as described in Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)."

- Although dedicated operator is used in the TS 3.6.1.3 Bases, the NRC staff does not think that it is appropriate to include reliance on a dedicated operator in the definition of drain time. Therefore, the NRC staff believes that the limiting drain rate should not include an exception for a dedicated operator.

- Proposed TS 3.5.2 Condition B does not provide an acceptable remedial action. Restoration of the inoperable low pressure ECCS injection/spray subsystem is required by Condition A and drain time has its own Conditions C, D, and E. In addition, there is no Condition that addresses not meeting both requirements of the LCO. Therefore, if drain time is <36 hours and one low pressure ECCS injection/spray subsystem is not operable, LCO 3.0.3 would apply and application of LCO 3.0.3 will not exit the mode of applicability, nor will it remediate the cause of the LCO not being met.

- The proposed required actions in Conditions C and D are not clear and concise and therefore, they may not be enforceable. The requirements need to be clear and concise in TS, as the TS Bases are not allowed to alter the meaning of TS.

- Proposed Required Action D.1 incorporates a flexible mitigating strategy into TS.

The NRC staff would like to offer the opportunity to discuss these concerns with the TSTF in a public meeting. A meeting is tentatively planned for June 5, 2014. Please contact Michelle C. Honcharik at (301) 415-1774 or Michelle.Honcharik@nrc.gov if you have any questions or need further information on this letter.

Sincerely,

/RA/

Anthony J. Mendiola, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 753

cc: See next page

The NRC staff would like to offer the opportunity to discuss these concerns with the TSTF in a public meeting. A meeting is tentatively planned for June 5, 2014. Please contact Michelle C. Honcharik at (301) 415-1774 or Michelle.Honcharik@nrc.gov if you have any questions or need further information on this letter.

Sincerely,

/RA/

Anthony J. Mendiola, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 753

cc: See next page

DISTRIBUTION:
PUBLIC
RidsNrrOd
RidsOgcMailCenter
RidsNrrDorl
RidsOpaMail
RidsNroOd
RidsAcrsAcnwMailCenter
SMazumdar, NRR
RidsNrrPMMHoncharik
RidsNrrDeEicb
RidsNrrLADBaxley
KBucholtz, NRR
RidsNrrDpr
RElliott, NRR
RidsNrrDprPlpb
PLPB R/F
RidsNrrDssStsb
MHardgrove, NRR
RidsNrrDss
SMiranda, NRR
RidsNeeDssSrxb
CJackson, NRR
JBettle, NRR
PLPB R/F

ADAMS Accession Nos.: ML14139A115; ML14139A106 (Pkg.); *concurred via e-mail NRR-106

OFFICE	PLPB/PM	PLPB/LA	STSB*	STSB/BC*	SRXB*	PLPB/BC
NAME	MHoncharik	DBaxley	KBucholtz	RBElliott	CJackson	AMendiola
DATE	05/20/2014	05/20/2014	04/30/2014	05/01/2014	05/15/2014	05/21/2014

OFFICIAL RECORD COPY

cc:

Technical Specifications Task Force
11921 Rockville Pike
Suite 100
Rockville, MD 20852
Attention: Brian Mann
E-mail: brian.mann@excelservices.com

Robert A. Slough
Comanche Peak Nuclear Power Plant
P. O. Box 1002, Mail Code A08
Glen Rose, Texas 76043
E-mail: robert.slough@luminant.com

Richard A. Loeffler
Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362-9637
E-mail: richard.loeffler@xenuclear.com

Wendy E. Croft
Exelon Nuclear
200 Exelon Way, Suite 340
Kennett Square, PA 19348
E-mail: wendi.croft@exeloncorp.com

Otto W. Gustafson
Entergy Nuclear Operations, Inc.
Palisades Nuclear Power Plant
27780 Blue Star Memorial Highway
Covert, MI 49043
E-mail: ogustaf@entergy.com