

## **NRR-PMDAPEm Resource**

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**From:** Miernicki, Michael  
**Sent:** Tuesday, July 22, 2014 5:03 PM  
**To:** garent@tva.gov; rhbryan@tva.gov  
**Cc:** Quichocho, Jessie; Poole, Justin; Elliott, Robert; Snyder, Pete  
**Subject:** Watts Bar 2 - RAI - Developmental Tech Specs Rev I  
**Attachments:** RAI WBN2 T.S.Rev I - STSB -Bases 3 0 6.docx

Attached please find an RAI from the Technical Specifications Branch regarding Watts Bar 2 Developmental Technical Specifications Revision I. Please acknowledge receipt of this question, and provide your response within 30 days.

Mike

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**REQUEST FOR ADDITIONAL INFORMATION**  
**REVIEW AND LICENSING OF TECHNICAL SPECIFICATIONS**  
**WATTS BAR NUCLEAR PLANT UNIT 2**  
**DOCKET NUMBER 50-391**

By letter dated June 16, 2014, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14169A525), Tennessee Valley Authority, (the Licensee) submitted a developmental revision I of the Watts Bar Unit 2 Technical Specifications and Technical Specifications Bases, for review and licensing by the U.S. Nuclear Regulatory Commission.

During review of the basis for Limiting Condition for Operation (LCO) 3.0.6 the staff has determined that additional information is required.

LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). In the case where the support system is included in TS the associated actions for each supported system only have to be met to the extent specified in the action for the support system.

Structures, systems or components (SSC) that are not explicitly required to be operable by TS but that perform required support functions for SSCs that are required to be operable by TS fall within the scope of a functionality assessment of a condition adverse to quality as addressed in NRC Inspection Manual Chapter 0326.

On page B 3.0-9 and continued on page B 3.0-10, a non-standard paragraph has been added to the TS bases in revision I for use "In cases where a non-TS support system has two redundant 100 percent capacity subsystems, ..." The paragraph continues, "loss of one support system does not result in a loss of support for either train of TS equipment. Both TS systems [remain] operable, despite a loss of support function redundancy, because the TS definition of operability does not require a TS subsystem's necessary support function to meet the single failure criterion. ... "

**Request for Additional Information**

Since the additional paragraph on pages B 3.0-9 and B 3.0-10 does not summarize the reason for LCO 3.0.6, but adds a new condition to LCO 3.0.6 such that LCO 3.0.6 may now be applied to a non-TS support system, please explain the basis for inclusion of this paragraph in the TS bases.

**Regulatory Basis**

Per 10 CFR 50.36(a)(1), "A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications."