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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 7, 1994

NOTE TO: EELB Members

THRU: Carl H. Berlinger, Chief, EELB, DE, NRR  
Om P. Chopra, EELB, DE, NRR

*Carl H. Berlinger*

FROM: Jim Lazevnick, EELB, DE, NRR

SUBJECT: \*\*\*TECH SPEC NOTE NO. 1\*\*\*  
APPLYING IMPROVED STS TO DGs WITH 7 DAY AOTs

Several EELB members have noted that there may not be sufficient standardized guidance on various issues that relate to technical specification changes on operating plants. In an effort to provide such guidance I intend to send you "TECH SPEC NOTES" on various technical specification related topics that might apply to several or more plants. These will be provided on an as-needed basis as I learn about an issue and will be sent through Carl and the lead engineer in the area (if there is one). Let me know if you have a tech spec issue that requires resolution and would be of benefit to other reviewers. Following is the first TECH SPEC NOTE.

Utilities that have DG technical specifications (TSs) with 7 day allowed outage times (AOTs) have been coming in requesting changes to their TSs using the improved STS as a basis for their request. As indicated in Carl Berlinger's note to EELB members dated August 12, 1993, the Commission has approved a policy that licensees may adopt portions of the improved STS without fully implementing all STS improvements. However, if they do this, they must adopt all related requirements. In the case of the utilities with DG 7 day AOTs, they have been requesting the relief in the improved STS that allows them not to test the operable DGs if they can rule out common cause failure of the DGs as the reason for the inoperability of the broken DG. They have not, however, adopted the portion of the improved STS requirement for a DG 3 day AOT, but rather have retained their 7 day AOT. We could therefore reject their request on the basis that they have not adopted all the related portions of the improved STS. Rather than do this however, we should allow them to take the exemption from testing for the first three days of the inoperability if they can positively rule out common cause failure as the reason for failure of their inoperable DG. If the inoperability continues beyond 3 days, however, they should test their remaining operable DGs once within the subsequent 24 hours (this test by the way should not require

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