

NRR-PMDAPEm Resource

From: Singal, Balwant
Sent: Tuesday, November 03, 2015 12:58 PM
To: Williams, Lisa L.
Subject: License Amendment Request for Adoption of Technical Specification Task Force (TSTF) - 425, Revision 3, Request for Additional Information (CAC No. MF6042)
Attachments: MF6042-RAI-STSB.docx

By letter dated March 17, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15093A178), Energy Northwest (the licensee) submitted a license amendment request (LAR) for adoption of TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b." The U.S. Nuclear Regulatory Commission (NRC) requests the attached additional information to complete its review of the request.

Draft Request for Additional Information (RAI) were transmitted to the licensee by e-mail dated October 26, 2015. The NRC staff was informed by you on October 29 that a clarification call is not required. Please treat this e-mail as formal transmittal of RAIs.

You are requested to provide your response within 30 days from the date of this e-mail.

Thanks.

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REQUEST FOR ADDITIONAL INFORMATION

LICENSE AMENDMENT REQUEST (LAR) TO ADOPT

TECHNICAL SPECIFICATION TASK FORCE (TSTF) – 425, REVISION 3

COLUMBIA GENERATING STATION

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DRAFT REQUEST FOR ADDITIONAL INFORMATION (RAI) (TECHNICAL SPECIFICATION BRANCH)

STSB-RAI-1

In Attachment-3, "Markup of Proposed Technical Specification Pages," of the LAR submittal, the licensee proposed to revise surveillance requirement (SR) 3.3.1.1.15 by changing the frequency from "24 months on a STAGGERED TEST BASIS" to "In accordance with the Surveillance Frequency Control Program." The notes in SR 3.3.1.1.15 were not revised to reflect this change, and they still provide instruction concerning the "STAGGERED TEST BASIS." Since the STAGGERED TEST BASIS is part of the SR frequency that is being transferred to the Surveillance Frequency Control Program (SFCP), please justify why this information should remain in the SR notes. This RAI applies to both versions of the SR 3.3.1.1.15 revision that were submitted (i.e., "Prior to Implementation of PRNM [Power Range Neutron Monitoring] Upgrade" and "After Implementation of PRNM Upgrade").

STSB-RAI-2

In multiple technical specification (TS) sections of Attachment 3 (e.g., 3.2.4, 3.3.1.1, 3.3.1.3, 3.3.2.1, 3.4.1, 3.10.8), the licensee provided two versions of page markups for the proposed SR revisions. The versions were titled, "Prior to Implementation of PRNM Upgrade" and "After Implementation of PRNM Upgrade." In the license submittal, there was no sufficient discussion concerning the reason for submitting the two versions, and, and, in at least two cases, a "Prior" version of a revised SR was submitted with no corresponding "After" version (i.e., TS sections 3.2.4 and 3.3.1.3). Also, for the "After Implementation of PRNM Upgrade" version of the SR revisions, the licensee did not submit TS bases.

Please provide the following: (1) a discussion of why two versions (i.e., "Prior" versus "After") of TS markups were submitted, (2) a justification for not submitting both a "Prior"

and "After" version for each proposed SR revision, and (3) the TS bases for the "After Implementation of PRNM Upgrade" SR revisions.

STSB-RAI-3

On marked-up TS bases page B 3.3.1.1-23 submitted by the licensee, a reference to the "7 day frequency" still remains in the revised bases description for SR 3.3.1.1.2. Since, SR 3.3.1.1.2 is being incorporated into the SFCP, this represents erroneous information.

Please justify why this information should be retained in the TS bases or revise the bases description appropriately.

STSB-RAI-4

On marked-up TS bases page B 3.6.1.3-14 submitted by the licensee, the following language associated with SR 3.6.1.3.8 was deleted:

The nominal 10 year interval is based on performance testing. Furthermore, any EFCV [excess flow check valve] failures will be evaluated to determine if additional testing in that test interval is warranted to ensure overall reliability is maintained. Operating experience has demonstrated that these components are highly reliable and that failures to isolate are very infrequent. Therefore, testing of a representative sample was concluded to be acceptable from a reliability standpoint (Reference 5).

Also, Reference 5 (i.e., NEDO-32977-A, "Excess Flow Check Valve Testing Relaxation," dated June 2000) was deleted from a list of references on page B 3.6.1.3-16.

This deleted information relates directly to the basis for "representative sample," which is the language used in SR 3.6.1.3.8. The NRC staff issued a previous safety evaluation (SE) approving a Topical Report (i.e., Safety Evaluation by the Office of Nuclear Reactor Regulation Boiling Water Reactor Owners Group General Electric Nuclear Energy Topical Report B21-00658-01 "Excess Flow Check Valve Testing Relaxation; March 14, 2000") (ADAMS Accession No. ML003729011) that allows relaxation associated with the EFCV testing (i.e., allowance of representative sampling). One of the staff's findings in the SE was that "representative sampling" needed to be defined, and it was acceptable to locate the definition in the TS bases. The exact wording deleted in the TS bases submittal was the same wording referenced in the SE. Also, the Reviewer's Note of NUREG-1433, Revision 4, "Standard Technical Specifications, General Electric BWR/4 Plants, Revision 4.0," (ADAMS Accession No. ML12104A192) states that this information applies to the representative sample that is allowed by this specification.

Since this change relates to representative sampling versus SR frequency, please provide a justification for removing this language from the TS bases or revise the submittal appropriately.