

**Advanced Passive 1000 (AP1000)
Generic Technical Specification Traveler (GTST)**

Title: Changes related to Section 5.1, Responsibility

I. Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST

TSTF Number and Title:

TSTF-65-A, Rev.1: Use of generic titles for utility positions (Note: This TSTF applies to STS NUREG-1431 Rev. 1 - see comment in Section IV of this GTST)

STS NUREGs Affected:

TSTF-65-A, Rev.1: NUREG-1430, -1431, -1432, -1433, -1434

NRC Approval Date:

TSTF-65-A, Rev.1: 02-Dec-97

TSTF Classification:

TSTF-65-A, Rev.1: Improve Specifications

II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

RCOL Std. Dep. Number and Title:

None

RCOL COL Item Number and Title:

VEGP COL Application, Rev. 3 (Ref. 2):

Bracketed site-specific information in GTS Subsection 5.1, Responsibility
COL Item 5.1.1, regarding the position title “[Plant Manager]”
COL Item 5.1.2, regarding the position title “[Shift Supervisor (SS)]”

RCOL PTS Change Number and Title:

None

III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses the considered changes that are: (1) applicable to operating reactor designs, but not to the AP1000 design; (2) already incorporated in the GTS; or (3) superseded by another change.

TSTF-65-A, Rev. 1 made changes to WOG STS 5.1.1, Rev. 1, by removing the brackets from the position title “[Plant Manager]” and changing the title to lower case; this change was already included in Rev. 0 of the VEGP PTS Subsection 5.1.1.

TSTF-65-A, Rev. 1 also added “Reviewer's Notes” at the beginning of STS 5.1 detailing the use of generic titles and title changes.

However, APOG does not recommend implementing the above changes made by TSTF-65-A, Rev. 1.

IV. Additional Changes Proposed as Part of this GTST (modifications proposed by NRC staff and/or clear editorial changes or deviations identified by preparer of GTST)

APOG Recommended Changes to Improve Specification 5.1

Remove the “Reviewer’s Notes” added to Section 5.1 by TSTF-65-A, Rev. 1.

Retain the brackets associated with the [Plant Manager] title. (GTS COL Item 5.1.1 and TSTF-65-A, Rev. 1).

V. Applicability

Affected Generic Technical Specifications and Bases:

Section 5.1, Responsibility

Changes to the Generic Technical Specifications and Bases:

None

VI. Traveler Information

Description of TSTF changes:

TSTF-65-A, Rev.1 changes WOG STS Rev. 1 by inserting “Reviewer’s Notes” at the beginning of Section 5.1 regarding the titles for members of a unit’s operation staff. It also replaces the bracketed titles with generic titles for staff positions in WOG STS Rev. 1 paragraph 5.1.1. Specifically, TSTF-65-A, Rev.1 changes the bracketed title from “[Plant Superintendent]” to “plant manager” in both paragraphs of WOG STS 5.1.1, Rev. 1. These changes are included in the WOG STS 5.1, Rev. 4.

AP1000 GTS 5.1 does not include these changes.

Rationale for TSTF changes:

According to TSTF-65-A, Rev.1, the change of the title “[Plant Superintendent]” to “plant manager,” allows the use of generic personnel titles as provided by ANSI/ANS 3.1. This change does not eliminate any of the specifications, responsibilities, or requirements for these positions, since the plant-specific personnel titles are currently identified in licensee controlled documents such as the Final Safety Analysis Report (FSAR) or the Quality Assurance (QA) plan. In addition, the “Reviewer’s Notes” are placed at the beginning of STS 5.1 to describe the use of the generic titles and title changes.

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

COL Item 5.1.1, regarding the position title “[Plant Manager]”, was completed in the VEGP PTS, Rev. 0, by removing the brackets and changing the title to lower case; this is the same as the change made by TSTF-65-A, Rev. 1.

COL Item 5.1.2, regarding the position title “[Shift Supervisor (SS)]”, was completed in the VEGP PTS by removing the brackets and changing the title of the unit operator with control room command function responsibility to “senior reactor operator (SRO).” This change is plant-specific. To maintain consistency with TSTF-65-A, Rev. 1 and WOG STS 5.1.2, Rev. 4, AP1000 STS 5.1.2, Rev. 0, retains the bracketed position title “[Shift Supervisor (SS)].”

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

According to the VEGP COL application discussion given for COL Item 5.1.1, “Generic titles are used consistent with the FSAR organization description in FSAR Section 13.1 and with WOG STS Revision 3.1.” Use of generic titles is also consistent with Revision 4 of the WOG STS 5.1.1.

The VEGP COL application also justifies COL item 5.1.2, by stating, “Generic titles are used consistent with the FSAR organization description in FSAR Section 13.1.” However, the title given for the plant operator with control room command function responsibility is plant-specific, which is why a typical title is in stated in brackets in TSTF-65-A, Rev. 1 and WOG STS 5.1.2, Rev. 4. Therefore AP1000 STS 5.1.2, Rev. 0, retains the bracketed position title “[Shift Supervisor (SS)].”

Description of additional changes proposed by NRC staff/preparer of GTST:

APOG does not recommend implementing the changes made by TSTF-65-A, Rev. 1.

Therefore, the brackets around the position title “[plant manager]” in Section 5.1.1 will be retained. Also the “Reviewer’s Notes” will not be included at the beginning of Section 5.1.

Rationale for additional changes proposed by NRC staff/preparer of GTST:

APOG recommends retaining the brackets associated with the title [Plant Manager] (GTS COL Item 5.1.1 and TSTF-65-A, Rev. 1 removed the brackets). APOG indicates that the COL Item should be included in the AP1000 STS to indicate that the information is plant specific.

VII. GTST Safety Evaluation

Technical Analysis:

This GTST makes no changes to GTS 5.1. Based on APOG's recommendation, changes proposed by TSTF-65-A, Rev. 1, are not included in AP1000 STS 5.1. Therefore, the NRC staff concludes that AP1000 STS Subsection 5.1 is an acceptable model Specification for the AP1000 standard reactor design.

References to Previous NRC Safety Evaluation Reports (SERs):

None

VIII. Review Information

Evaluator Comments:

None

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Review Information:

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on 5/22/2014.

APOG Comments (Ref. 7) and Resolutions:

1. (Internal #506) 5.1, While TSTF-65-A, Rev. 1 inserts "Reviewer's Notes at the beginning of Section 5.1, APOG recommends removing the "Reviewer's Notes." APOG indicates that "The intent of the TSTF-65 Reviewer's Note (being added to the AP1000 STS NUREG) imposes a new or revised COL Item, which is not appropriately coordinated with the AP1000 DCD."

This issue is resolved by removing the "Reviewer's Notes" as recommended.

2. (Internal #506) 5.1, GTST describes the change to the COL Item regarding the position title "[Plant Manager]," which was completed in the VEGP PTS, Rev. 0, by removing the brackets and changing the title to lower case; this is the same as the change made by TSTF-65-A, Rev. 1. This COL Item should not be removed in the AP1000 STS NUREG with disposition as done in VEGP COL. This is resolved by retaining the brackets around the position title "Plant Manager."

However, APOG and SPSB agreed to revisit how the AP1000 STS should present COL information, bracketed TSTF provisions, and any associated reviewer's notes following completion of STS Rev. 0.

NRC Final Approval Date: 12/14/2015

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IX. Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases

None

X. References Used in GTST

1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
3. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF-91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013, ADAMS Package Accession No. ML13238A337, which contains:

ML13238A355 Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units 3 and 4 (LAR 12-002).

ML13238A359 Enclosure 1 - Amendment No. 13 to COL No. NPF-91

ML13239A256 Enclosure 2 - Amendment No. 13 to COL No. NPF-92

ML13239A284 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13)

ML13239A287 Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms

ML13239A288 SE Attachment 2 - Table A - Administrative Changes

ML13239A319 SE Attachment 3 - Table M - More Restrictive Changes

ML13239A333 SE Attachment 4 - Table R - Relocated Specifications

ML13239A331 SE Attachment 5 - Table D - Detail Removed Changes

ML13239A316 SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

- ML13277A616 Letter - Correction To The Attachment (Replacement Pages) - Vogtle Electric Generating Plant Units 3 and 4-Issuance of Amendment Re: Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402)
- ML13277A637 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13) (corrected)
4. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005.
 5. RAI Letter No. 01 Related to License Amendment Request (LAR) 12-002 for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses, September 7, 2012 (ML12251A355).
 6. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360).

7. APOG-2014-008, APOG (AP1000 Utilities) Comments on AP1000 Standardized Technical Specifications (STS) Generic Technical Specification Travelers (GTSTs), Docket ID NRC-2014-0147, September 22, 2014 (ML14265A493).
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XI. MARKUP of the Applicable GTS Subsection for Preparation of the STS NUREG

The entire section of the Specifications and the Bases associated with this GTST is presented next.

Changes to the Specifications and Bases are denoted as follows: Deleted portions are marked in strikethrough red font, and inserted portions in bold blue font.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The [Plant Manager] shall be responsible for overall unit operations and shall delegate in writing the succession to this responsibility during his absence.
- The [Plant Manager] or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.
- 5.1.2 The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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XII. Applicable STS Subsection After Incorporation of this GTST's Modifications

The entire subsection of the Specifications and the Bases associated with this GTST, following incorporation of the modifications, is presented next.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The [Plant Manager] shall be responsible for overall unit operations and shall delegate in writing the succession to this responsibility during his absence.
- The [Plant Manager] or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.
- 5.1.2 The [Shift Supervisor (SS)] shall be responsible for the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [SS] from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
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