

**Industry/NRC Discussion of
Second Round Request for Additional Information on
TSTF-541, Revision 0, "Add Exceptions to Surveillance
Requirements When the Safety Function is Being
Performed"**

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Background

- Surveillance Requirement (SR) 3.0.1 states that when an SR is not met, the LCO is not met.
- In most cases, failure to meet an SR also results in the inoperability of the subject SSC.
- The terms "met" and "performed" have specific meanings in the TS.
 - An SR is "met" when the acceptance criteria are satisfied.
 - SRs are required to be met at all times when in the Applicability unless there is an exception.
 - An SR is "performed" when the test or verification is completed successfully.

Background

- In cases when an SR may not be met, but the system may still be operable, the SRs contain exceptions, such as:
 - Verify each ECCS automatic valve in the flow path *that is not locked, sealed, or otherwise secured in position*, actuates to the correct position on an actual or simulated actuation signal."
 - "Verify each vacuum breaker is closed" is modified by a Note that states, "*Not required to be met for vacuum breakers open when performing their intended function.*"

Background

- In 2006-2007, the PWROG and BWROG discussed several plant events in which SRs were not met, but the system was still capable of performing its specified safety function, resulting in entering Actions.
- In October 2008, the TSTF submitted TSTF-512, "Revise SR 3.0.3 to Address SRs that Cannot be Performed or are Not Met," which provided an exception to meeting SRs if the system was operable.
- In May 2009, the NRC did not accept the traveler and suggested that the industry instead pursue exceptions to individual SRs that could be not met when the system was still operable.

TSTF-541

- Following a comprehensive review of the Improved Standard Technical Specifications (ISTS), the TSTF submitted TSTF-541, "Add Exceptions to Surveillance Requirements When the Safety Function is Being Performed."
- TSTF-541 proposed optional, plant-specific exceptions to:
 - 6 B&W SRs
 - 11 Westinghouse SRs
 - 12 Combustion Engineering SRs
 - 7 BWR/4 SRs
 - 11 BWR/6 SRs

TSTF-541

- All of the proposed exceptions are in one of the following forms:
 - A note stating, "*Not required to be met for [devices] locked, sealed, or otherwise secured in the [open / closed / actuated] position*"
 - An inserted phrase "*Verify each [device] [that is not locked, sealed or otherwise secured in the [open / closed / actuated] position] can be [opened / closed /actuated].*"

TSTF-541

- The ISTS currently contains many similar SR exceptions.

NUREG	"Not required to be met"	"locked, sealed, or otherwise secured"
1430, B&W	9	18
1431, Westinghouse	7	26
1432, CE	9	22
1433, BWR/4	24	16
1434, BWR/6	25	18

TSTF-541

- The Bases for each affected SR is revised to include the following Note to explain when the proposed plant-specific Notes can be used.

-----REVIEWER'S NOTE-----

Adoption of the Note excluding dampers and valves that are locked, sealed, or otherwise secured in position requires confirmation by the licensee that movement of the dampers and valves following an accident is not assumed in the safety analysis.

- The model application also requires this verification.
- It was anticipated that the verification information to be provided by the licensee would be the subject of discussions with the NRC during review of TSTF-541.

TSTF-541

- TSTF-541 was submitted on September 10, 2013.
- The TSTF was told that the review of TSTF-541 would be delayed due to the NRC resource reallocation to the Mitigating Strategies Directorate.
- The acceptance and schedule letter was received on August 13, 2015.
- An RAI was also provided on August 13, 2015.

First Round RAI

- The first-round RAI was unusual, such as:
 - Please provide a complete discussion regarding how the SRs will continue to meet 10 CFR 50.36(c)(3).
 - Please provide a discussion regarding how the SRs will be consistent with 10 CFR Part 50, Appendix B, Criterion XI and Criterion XVI.
 - [T]he proposed change appears to be circumventing the requirements of SR 3.0.1, fundamentally altering the purpose of SRs.
- None of the 6 first-round questions recognized that similar exceptions appear many times in the existing ISTS.

TSTF-541

- The TSTF was informed that members of the staff were not in favor of accepting the traveler and the PM wrote the questions from their basis for rejection.
- The TSTF did not request a teleconference to discuss the RAI responses prior to submittal.
- The TSTF believed the best course of action was to respond to these questions so that the staff could proceed with a technical review of the proposed change.
- The TSTF responded on November 11, 2015.

TSTF-541

- On February 17, 2016, the NRC provided a draft second-round RAI containing 20 questions.
- At the February 18, 2016 TSTF/NRC public meeting, the TSTF stated that we would request a meeting with executive support to discuss the second round RAI.
- The NRC desired to send the RAI to meet the review schedule. The TSTF agreed, provided the response date would be established after the meeting.

Second Round RAI

- Of the 20 questions:
 - Four were technical questions related to the change (10, 11, 12, 15)
 - The TSTF understands the questions and can respond.
 - Six were identical to the six first-round RAI questions (1, 2, 3, 4, 5, 6)
 - The remaining ten restated a first-round question, or mischaracterized the proposed change, the TS, or the regulations (7, 8, 9, 13, 14, 16, 17, 18, 19, 20)

Second Round RAI

- It is clear that the reviewers have an overall concern with the proposed change that the industry does not understand.
- We would like to understand the staff's concern so that we can move forward on this change.

Second Round RAI

- The table handout describes the first-round question and TSTF response, and any related second-round question with our comments.