



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

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August 16, 1999

Mr. James Davis, Director  
Operations Department  
Nuclear Energy Institute  
1776 I Street, N. W.  
Suite 400  
Washington, DC 20006-3708

Dear Mr. Davis:

This is to inform you of our decisions on changes to the Standard Technical Specification (STS) NUREGs proposed by the NEI Technical Specification Task Force (TSTF). Those travelers Approved are TSTFs -030, R.3; -068, R.2; -190, R.1; -227; -273, R.2; -298; and -312, R.1. Those travelers Modified, after discussion with the respective Owners Group Chairman, are TSTFs -036, R.3; 231; -276, R.1; -283, R.1; and -346. Please see the enclosure for NRC comments with regard to the travelers that were Modified.

For your information, the following travelers are pending evaluation by a technical branch: TSTFs -207, R.3 (SPLB); -226 (SRXB); -264 (SRXB); -295 (EICB); -297 (SPLB); -306 (EICB); -313 (MCEB); -329 (SRXB); -332 (EICB); -334 (SPLB, SPSB, & MCEB); -335 (SPLB); -336 (SPLB); and -337 (SRXB).

Please contact me at (301) 415-1161 or e-mail [wdb@nrc.gov](mailto:wdb@nrc.gov), if you have any questions or need further information.

Sincerely,

A handwritten signature in cursive script that reads "William D. Beckner".

William D. Beckner, Chief  
Technical Specifications Branch  
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Office of Nuclear Reactor Regulation

Project No. 689  
Enclosures: As stated

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## DISPOSITION SUMMARY

### TSTFs -036, R.3: Modify

There are two general classes of LCOs for which this proposed change applies:

1. Required electrical sources during shutdown, and
2. Various ventilation systems which are required to mitigate a fuel handling accident.

Relative to the electrical sources, it is difficult to see how the requirements for electrical sources during shutdown should be more restrictive than requirements for electrical sources while at power. Thus entering the shutdown LCOs due to fuel movement should not impose any additional requirement.

The ventilation systems applicable only to fuel movement do represent a potential problem in that these systems have generally have no relationship to power operation. It would be inappropriate and possibly contrary to safety to require a shutdown due to fuel handling problems. While the addition of the proposed note would solve this potential problem, the staff rejected it based on the low likelihood that such a problem would occur and the potential for introducing ambiguities in the TS.

This proposal to exclude LCO 3.0.3 applicability also goes contrary to a desire by the staff to expand applicability of LCO 3.0.3 to all modes of operation. The staff is concerned that if licensees can not comply with LCOs or associated AOTs, there should always be clear requirements. One way of accomplishing this is to expand the applicability of LCO 3.0.3 to shutdown which the staff has proposed as a change to the iSTS. The staff proposal did not address the issue of LCO applicability solely due to movement of fuel. However, the concern about always having a clear path to follow is directly applicable to the industry concern that, due to an ambiguity in the technical specifications, a fuel handling problem might result in an inappropriate plant shutdown. The staff suggests that rather than making LCO 3.0.3 not applicable to these situations, that the staff proposal to change LCO 3.0.3 be further modified to make it also specifically address the case of fuel movement at power.

### TSTF-231: Modify

Instead of revising to replace "any three" with "the", modify the phrase to read, "...no single instrument failure will preclude a scram from this Function even if one TSV should fail to close."

### TSTF-276, R.1: Modify

The proposed changes are essentially acceptable. However, the proposed Bases should be expanded to more closely reflect the SR NOTES that will be included as part of this change. As proposed, the Bases do not address the exception to meeting the power factor requirements or why it is acceptable. The following is a suggested change to the proposed Bases.

Note 2 (Insert 3) Note 3 (Insert 4) ensures that the DG is tested under load conditions that are as close to design basis conditions as possible. When synchronized with offsite power, testing should be performed at a power factor of  $\leq [0.9]$ . This power factor is representative of the actual inductive loading a DG would see under design basis accident conditions. Under certain conditions, however, Note 2 (Insert 3) Note 3 (Insert 4) allows the surveillance to be conducted at a power factor other than  $\leq [0.9]$ . These conditions occur when grid voltage is high, and the additional field excitation needed to get the power factor to  $\leq [0.9]$  results in voltages on the emergency busses that are too high. Under these conditions, the power factor should be maintained as close as practicable to  $[0.9]$  while still maintaining acceptable voltage limits on the emergency busses. In other circumstances, the grid voltage may be such that the DG excitation levels needed to obtain a power factor of  $[0.9]$  may not cause unacceptable voltages on the emergency busses, but the excitation levels are in excess of those recommended for the DG. In such cases, the power factor shall be maintained as close as practicable to  $[0.9]$  without exceeding the DG excitation limits.

#### TSTF-283, R.1: Modify

Recommendation to reject is changed to modify. This change is one of industry's key proposals that they feel very strongly about. It also appears that we have made some progress on coming closer to agreement and discussions should be held with the TSTF in an attempt to reach agreement. These discussions should include the EICB staff to ensure we can all agree on exact words.

#### TSTF-346: Modify

The concept is acceptable. However, some questions need to be answered and some details worked out. See the following comments/questions.

1. BWRs do not have reactor coolant pumps. Therefore, the proposed change is not directly applicable to BWRs. In order to make the proposed change applicable to BWRs, the following questions need to be answered: (1) What systems/components that are only powered from offsite power does a BWR rely on to affect a shutdown to MODE 4 in 36 hours? (2) How long would it take for a BWR to reach MODE 5 using only systems/components powered from an EDG?

2. All plant designs are not the same. There are some plants which have offsite sources which only power the emergency busses. For such plant designs, the loss of both offsite power sources would not necessarily mean that the reactor coolant pumps are without power.

This has not been addressed in the proposed change. In a plant design with separate offsite power sources to the emergency busses, the offsite power to the reactor coolant pumps would not be covered by TS, and the loss of this power would not invoke any TS Actions. This has not been addressed, either.

3. The issue of 3 AC sources inoperable in which 2 of the inoperable sources are EDGs has not been addressed in the proposed change.

The staff and the TSTF need to discuss this proposed change with a view towards modifications which would allow all possible scenarios to be addressed.

## TECHNICAL BRANCH NAMES AND ACRONYMS

### Division of Engineering (DE)

Materials and Chemical Engineering Branch (EMCB)  
Mechanical and Civil Engineering Branch (MCEB)  
Electrical and Instrumentation Controls Branch (EICB)

### Division of Systems Safety and Analysis (DSSA)

Plant Systems Branch (SPLB)  
Reactor Systems Branch (SRXB)  
Probabilistic Safety Assessment Branch (SPSB)