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

Technical Specifications Task Force
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: PLANT-SPECIFIC ADOPTION OF TRAVELERS TSTF-51, REVISION 2, "REVISE CONTAINMENT REQUIREMENTS DURING HANDLING IRRADIATED FUEL AND CORE ALTERATIONS," TSTF-286, REVISION 2, "OPERATIONS INVOLVING POSITIVE REACTIVITY ADDITIONS," AND TSTF-471, REVISION 1, "ELIMINATE USE OF TERM CORE ALTERATIONS IN ACTIONS AND NOTES"

Dear Members of the Technical Specifications Task Force:

By letter dated November 7, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13246A358), the U.S. Nuclear Regulatory Commission (NRC) staff identified potential operating issues with the continued adoption of the subject travelers related to core monitoring instrumentation and dose consequences. It was suggested in the letter that licensees not submit amendments to adopt these three Travelers until a final resolution was achieved.

After considerable review and analysis, NRC staff concludes that for certain facilities, license amendment requests (LARs) adopting TSTF-51 and TSTF-471 could result in exceeding the bounding licensing basis Fuel Handling Accident (FHA) analysis of record dose for the control room and is therefore considered an unanalyzed condition.

Consistent with the requirements stated in Title 10 of the *Code of Federal Regulations* Part 50 Sections 50.67 and 50.92, along with existing guidance in Regulatory Guides 1.183 and 1.195, Regulatory Issue Summaries 2001-19, 2006-04, and 2001-22, LARs should identify previously evaluated accidents that are affected by the proposed change, describe the radiological and non-radiological impacts including analysis assumptions, inputs, and methods in sufficient detail to support review by the NRC staff and explain why any change in the probability, consequences, or margins of safety is or is not significant.

To minimize the potential for being requested to provide needed information under existing requirements and guidance, licensees adopting TSTF-51 and TSTF-471 are reminded that their application should include the following information to support the NRC staff's review of the requested changes:

- Information describing the licensee's evaluation of "recently" irradiated fuel that demonstrates that after sufficient radioactive decay has occurred (from the time of shutdown) that the onsite and offsite radiological doses resulting from a FHA remain below the regulatory limits and the regulatory guidance limits, and;

- Traditionally, the worst case FHA of record (i.e., the drop of an irradiated fuel assembly and fuel handling tool onto an irradiated fuel assembly) has produced the highest resultant radiological dose at the onsite and offsite boundaries, which bounds the resultant radiological doses from lesser events. Licensees will need to review their plant-specific operating procedures and design basis documents and confirm that the proposed changes in TSTF-51 and/or TSTF-471 will not cause the resultant radiological doses at the onsite and offsite boundaries from dropping a load during core alterations to exceed those recorded in the FHA of record. The licensee's review should take into account only those safety systems required to be operable by the proposed technical specifications. If the resultant radiological doses mentioned above exceed those recorded in the FHA of record, then an additional licensing basis change will be required in order to adopt TSTF-51 and/or TSTF-471, which should be included in the TSTF-51 and/or TSTF-471 license amendment request.

Provided that the above information provided above is satisfactorily addressed, the NRC staff has determined that their initial concerns can be addressed without any changes needed to the travelers.

If you have any questions, please contact Michelle Honcharik at 301-415-1774 or via e-mail at Michelle.Honcharik@nrc.gov.

Sincerely,

Victor Cusumano, Chief
Technical Specifications Branch
Division of Safety Systems
Office of Nuclear Reactor Regulation

Project No. 753

Enclosed: As stated

cc: See next page

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***concurred via e-mail** **NRR-106**

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