

## **NRC DISPOSITION OF TSTF COMMENTS ON THE DRAFT SAFETY EVALUATIONS OF**

### **TSTF-567, "ADD CONTAINMENT SUMP TS TO ADDRESS GSI 191 ISSUES"**

General TSTF Comments from Attachment 1 to TSTF letter dated April 16, 2018 (ADAMS Accession No. ML18106B172).

1. The two Safety Evaluations (SEs) contain in multiple locations, the term "Limiting Condition for Operation" or "LCO" instead of the correct term "Technical Specifications" or "TS." The TS for a system consist of the LCO, Applicability, Actions, and Surveillance Requirements (SRs). The LCO section of the TS provides a detailed statement describing the LCO. For example, an SR is part of a TS, not part of an LCO. The only exception to the use of this terminology is the discussion of the Required Action B.1 Note. The Standard Technical Specifications (STS) convention is to state, "Enter applicable Conditions and Required Actions of LCO 3.X.X." While technically incorrect, this convention is well established in the STS and is not altered in the traveler. Discussion in the SEs of this note should use terminology consistent with the TS. The recommended changes are shown in the documents.
2. The TSTF-567, Revision 1, change to the Safety Function Determination Program, TS 5.5.15, is plant-specific based on applicability (i.e. LCO 3.0.6 and the SFDP have been incorporated into the plant specific TS) and previous adoption of TSTF-273, and therefore it is denoted as optional in TSTF-567. The language was previously approved by the NRC as TSTF-273, Revision 2, "SFDP Clarifications," on August 16, 1999, and has been included in the STS. Therefore, this change does not need to be discussed in staff's SE of the incorporation of the traveler into the STS, but should be included as an optional change in the model plant-specific SE. Recommended changes are shown in the documents.
3. The SE discussions of the optional inclusion of a Risk Informed Completion Time (RICT) for Required Action B.1 present the RICT as a replacement for the Completion Time. However, the RICT is an additional, optional Completion Time. The recommended changes are shown in the documents.
4. TSTF-567, Revision 1, states that the Completion Time for Required Action B.1 is plant-specific. The Completion Time should be the less restrictive (i.e., longer) of the Completion Times for a single inoperable ECCS train or CSS train. This allows the ECCS and CSS Required Actions to control the licensee's actions if the sump is inoperable for reasons other than containment accident generated and transported debris exceeding the analyzed limits. For some licensees, the Completion Time for a single inoperable CSS train is 7 days, not 72 hours (consistent with NUREG-1431, TS 3.6.6B, Condition A). For those licensees, the containment sump Required Action B.1 Completion Time would be 7 days instead of 72 hours. This aspect of the traveler is not discussed in the SEs and has been added.

**Disposition of Comments on the Draft Traveler Safety Evaluation of TSTF-567**

<b>Page(s)</b>	<b>Line(s)<sup>1</sup></b>	<b>TSTF Comment on Traveler SE</b>	<b>NRC Disposition</b>
1	17	Changed "STSS" to "STS." This term "Standard Technical Specifications" is already plural.	Incorporated.
1	19, 20, footnote	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases changes and added STS Volume 2 references.	Incorporated.
1	22,23,25	See General Comment 1.	Incorporated.
1	24	See General Comment 2.	Incorporated.
1	23	Add spaces to be consistent with the STS title.	Incorporated.
1	29,30	The discussion of the applicability of TSTF-567 is not relevant to the traveler SE. Moved the discussion to the model SE.	Incorporated.
2	6	Editorial recommendations.	Incorporated.
2	10, 25, 28, 44, 47, 49	See General Comment 1.	Incorporated.
3	1-8	See General Comment 2.	Incorporated.
3	12, 14, 17, 19, 30, 31, 35, 37, 38, 42, 43	See General Comment 1	Incorporated.
3	10	Changed "STSS" to "STS." This term "Standard Technical Specifications" is already plural.	Incorporated.
3	38	The Section 2.2.2 discussion of SR TS 3.5.3.1 implies it only references one TS 3.5.2 SR. A clarification is made.	Incorporated.
3	31, 44, 45	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases changes.	Incorporated.
3	42	Editorial recommendations.	Incorporated.
4	1-12	See General Comment 2.	Incorporated.
4	14, 16, 17, 42, 46, 47	See General Comment 1.	Incorporated.
4	17-25	Editorial recommendations.	Incorporated.
4	34	Editorial correction. The term CSS had not been previously defined.	Incorporated.

<sup>1</sup> Line numbers correspond to the proposed revisions attached to TSTF letter dated April 16, 2018 (ADAMS Accession No. ML18106B172).

<b>Page(s)</b>	<b>Line(s)<sup>1</sup></b>	<b>TSTF Comment on Traveler SE</b>	<b>NRC Disposition</b>
4	48-49	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases.	Incorporated.
5	1	Changed "STs" to "STS." This term "Standard Technical Specifications" is already plural.	Incorporated.
5	2	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases changes and added STS Volume 2 references.	Incorporated.
5	2	See General Comment 1.	Incorporated.
5	36	Changed "STs" to "STS." This term "Standard Technical Specifications" is already plural.	Incorporated.
6	17, 18, 19	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases.	Incorporated.
6	27-28	Changed "STs" to "STS." This term "Standard Technical Specifications" is already plural.	Incorporated.
6	38, 41	See General Comment 1.	Incorporated.
7	5, 12	See General Comment 1.	Incorporated.
7	7-8	Editorial correction. The phrase "as well as" appears to be incorrect.	Incorporated.
7	24-50	See General Comment 2.	Incorporated.
8	1-14	See General Comment 2.	Incorporated.
8	16, 18, 20, 21, 22, 30, 40, 46, 47, 50	See General Comment 1.	Incorporated.
8	26-27	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases changes.	Incorporated.
9	12	Editorial recommendation.	Incorporated.
9	20	Deleted the term "degraded or nonconforming" to describe conditions. That term is used in IMC-0326 related to operability determinations, and in this situation the sump has already been determined to be inoperable. Using that term will be confusing and is unnecessary.	Incorporated.
9	24	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases changes.	Incorporated
10	50	Editorial recommendation.	Incorporated.
11	1, 3, 4, 5, 6, 25, 26, 27	See General Comment 4.	Incorporated.

<b>Page(s)</b>	<b>Line(s)<sup>1</sup></b>	<b>TSTF Comment on Traveler SE</b>	<b>NRC Disposition</b>
11	12, 13, 16, 31	See General Comment 3.	Incorporated.
11	31, 32, 33	Editorial correction. As originally worded, the SE implies that two LARs would be required: one to adopt TSTF-567 and one to add the RICT. The intent is that a single plant-specific LAR is required.	Incorporated.
11	50, 51	See General Comment 1.	Incorporated.
12	14	Changed "STs" to "STS." This term "Standard Technical Specifications" is already plural.	Incorporated.
12	21, 22, 30, 32	See General Comment 1.	Incorporated.
12	24-28, 38, 46, 51	The traveler SE evaluates changing the STS, which includes the Bases. Added discussions of the Bases changes.	Incorporated.

**Disposition of Comments on the Draft Model Safety Evaluation of TSTF-567**

<b>Page(s)</b>	<b>Line(s)<sup>2</sup></b>	<b>TSTF Comment on Model SE</b>	<b>NRC Disposition</b>
1	23, 24, 26	See General Comment 1.	Incorporated.
1	24, 25, 26	See General Comment 2.	Incorporated.
1	25	Per the STS Writer's Guide Section 2.1.1, 5.5.15 is a specification, not a section.	Incorporated.
1	34,35	Relocated the discussion of the applicability of the change from the traveler SE to the model SE.	Incorporated.
2	6,7	Editorial recommendation.	Incorporated.
2	11, 26, 30, 46	See General Comment 1.	Incorporated.
3	1, 3, 22, 24, 27, 29, 38, 39, 43, 45, 48, 49	See General Comment 1.	Incorporated.
3	7, 8, 10, 12-18, 22, 23	See General Comment 2.	Incorporated.
3	10, 12, 23	Per the STS Writer's Guide Section 2.1.1, 5.5.15 is a specification, not a section.	Incorporated.
4	3-4, 6-16	See General Comment 2.	Incorporated.
4	6, 9	Per the STS Writer's Guide Section 2.1.1, 5.5.15 is a specification, not a section.	Incorporated.
4	18, 20, 43	See General Comment 1.	Incorporated.
4	24-27	Recommended editorial improvement.	Incorporated.
4	31	See General Comment 3.	Incorporated.
4	36	The acronym CSS had not been previously defined.	Incorporated.
4 5	50-51 1-2	Instead of requiring the reviewer to develop a justification for applying the containment sump to plants with more than one sump, recommend using the existing justification for this design in the traveler SE.	Incorporated.
5	3, 9	See General Comment 1.	Incorporated.
5	5, 6, 8, 9	Whether the Table of Contents is part of the license is plant-specific. Recommend making the discussion of the Table of Contents optional and added a Reviewer's Note.	Incorporated.

<sup>2</sup> Line numbers correspond to the proposed revisions attached to TSTF letter dated April 16, 2018 (ADAMS Accession No. ML18106B172).

<b>Page(s)</b>	<b>Line(s)<sup>2</sup></b>	<b>TSTF Comment on Model SE</b>	<b>NRC Disposition</b>
5 6	33-51 1-14	Recommended that the model SE include optional discussions of all the optional variations included in the TSTF-567, Revision 1, model application.	Incorporated.
6	17	See General Comment 3.	Incorporated.
7	8-10, 23-25, 28-30, 33-35	The licensee submittal included Bases changes for information, conforming with the regulation. Recommend that the requirement for Bases and the STS Bases be included in the model SE discussion.	Incorporated.
7	39, 41, 42	See General Comment 1.	Incorporated.
8	8, 13	See General Comment 1.	Incorporated.
8	28	Per the STS Writer's Guide Section 2.1.1, 5.5.15 is a specification, not a section.	Incorporated.
8 9	25, 26, 28-50 1-18	See General Comment 2.	Incorporated.
9	8, 13	Corrected TS number.	Incorporated.
9	20, 22, 24, 25, 28, 37, 48, 49	See General Comment 1.	Incorporated.
9	45-46	Added a reviewer's note pointing to the acceptance applicability variation.	Incorporated.
10	2	See General Comment 1.	Incorporated.
10	14	Editorial recommendation.	Incorporated.
10	22	Deleted the term "degraded or nonconforming" to describe conditions. That term is used in IMC-0326 related to operability determinations, and in this situation the sump has already been determined to be inoperable. Using that term will be confusing and is unnecessary.	Incorporated.
10	26, 27	The following list was in the TS Bases. As the list contains examples, it is not inappropriate to discuss Bases content.	Incorporated.
11	33, 34, 35	A key sentence from the traveler and traveler SE is added to the model SE.	Incorporated.
11	49	See General Comment 1.	Incorporated.
11	50	Editorial recommendation.	Incorporated.
12	1-5, 18	See General Comment 4.	Incorporated
12	5, 13	See General Comment 3.	Incorporated.
12	24, 25, 29	Added a reviewer's note pointing to an allowable variation for a Mode 4 end state.	Incorporated.
12	32	Changed "STSs" to "STS." This term "Standard Technical Specifications" is already plural.	Incorporated.
12	39, 40	See General Comment 1.	Incorporated.

<b>Page(s)</b>	<b>Line(s)<sup>2</sup></b>	<b>TSTF Comment on Model SE</b>	<b>NRC Disposition</b>
13	7,8, 10-14	Whether the Table of Contents is part of the license is plant-specific. Recommend making the discussion of the Table of Contents optional and added a Reviewer's Note.	Incorporated.
13	13, 14, 23, 25	See General Comment 1.	Incorporated.
13	16-21, 23	The plant-specific SE should acknowledge the Bases were provided and met the description in 50.36(a). This allows the licensee to reference the TS SE in the Bases change made under the TS Bases Control Program.	Incorporated, with edits.
13	43, 45	Revised the referenced regulations to be consistent with the traveler SE. Added a missing parenthesis.	Not incorporated because regulations not discussed in model SE.
13	49	Added braces to be consistent with other italicized directions.	Incorporated.
14	7, 8, 12, 23, 24	Added braces to be consistent with other italicized directions.	Incorporated.