



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

May 21, 2018

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER TSTF-569, "REVISE RESPONSE TIME TESTING DEFINITION" (EPID: L-2018-PMP-0002)

Dear Members of the Technical Specifications Task Force:

By letter dated February 8, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18039A003), you submitted to the U.S. Nuclear Regulatory Commission (NRC) for review Technical Specifications Task Force (TSTF) Traveler TSTF-569, "Revise Response Time Testing Definition." Upon review of the information provided, the NRC staff has determined that additional information is needed to complete the review. On May 14, 2018, Mr. Brian Mann, Vice President of Industry Programs, EXCEL Services Corporation, agreed that the NRC staff will receive your response to the enclosed request for additional information (RAI) questions within 30 calendar days of the date of this letter (or the next business day if 30 days falls on a weekend).

The review schedule that was provided in the acceptance letter dated March 26, 2018 (ADAMS Accession No. ML18057A160), has not changed.

MILESTONE	SCHEDULE DATE
Issue Draft Safety Evaluation	November 5, 2018
Issue Final Safety Evaluation	February 8, 2019

If you have any questions, please contact me at (301) 415-1774 or via e-mail to [Michelle.Honcharik@nrc.gov](mailto:Michelle.Honcharik@nrc.gov).

Sincerely,

***/RA by Margaret Chernoff for/***

Michelle C. Honcharik, Senior Project Manager  
Technical Specifications Branch  
Division of Safety Systems  
Office of Nuclear Reactor Regulation

Project No. 753

Enclosure:  
Request for Additional Information

cc: See next page

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DATED: MAY 21, 2018

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**ADAMS Accession No. ML18134A075;**

**\*concurred via memo (ML18123A555)**

**\*\*concurred via e-mail**

**NRR-106**

<b>OFFICE</b>	<b>NRR/DSS/STSB/PM</b>	<b>NRR/DORL/LSPB/LA**</b>	<b>NRR/DE/EICB/BC*</b>	<b>NRR/DSS/STSB**</b>
<b>NAME</b>	MHoncharik (by MChernoff for)	JBurkhardt	MWaters	VCusumano
<b>DATE</b>	05/21/2018	5/16/2018	5/4/2018	5/15/2018

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Technical Specifications Task Force

Project No. 753

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**REQUEST FOR ADDITIONAL INFORMATION**

**TECHNICAL SPECIFICATIONS TASK FORCE**

**TRAVELER TSTF-569, "REVISE RESPONSE TIME TESTING DEFINITION"**

**(EPID: L-2018-PMP-0002)**

By letter dated February 8, 2018, the Technical Specifications Task Force (TSTF) submitted Revision 0 of Traveler TSTF-569, "Revise Response Time Testing Definition" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18039A003). The regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(3), "Surveillance requirements," states that "[s]urveillance requirements are requirements relating to test, calibration, or inspection to assure that necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met." The U.S. Nuclear Regulatory Commission (NRC) staff requires the following additional information to confirm that Response Time Testing (RTT) surveillance tests, excluded for previously unanalyzed components, will be based on verifiable methodologies:

1. Traveler TSTF-569 refers to performance of a similarity analysis of NRC-approved methodologies as a basis for allowing licensees to modify RTT requirements. The NRC staff notes that the approved methodologies, though similar, were not found to be identical. It will therefore be necessary for licensees to perform an evaluation of similarity between different verification methods using an established set of criteria. Describe the criteria that will be used when comparing new, but unapproved methodologies, to methodologies that have been approved by the NRC.

As an example, topical reports WCAP-13632-P-A, "Elimination of Pressure Sensor Response Time Testing Requirements," and CEOG NPSD-1167-A, "Elimination of Pressure Sensor Response Time Testing Requirements," reference the Electric Power Research Institute (EPRI) topical report EPRI Report NP-7243, "Investigation of Response Time Testing," and its associated methodology. However, both of these topical reports provide additional evaluations for sensors that were not within the scope of the EPRI report. These additional analyses included different amounts of supporting plant data and, in some cases, included similarity of design analyses instead of using the methodology established in the EPRI document. While these alternate methodologies were ultimately deemed acceptable by the NRC, they included changes to the methodology that had originally been applied. If licensees are to compare methodologies to determine if a new methodology is consistent with an approved methodology, then a set of comparative criteria should be established.

2. In addition to approving the methodology used for EPRI Report NP-7243, the NRC's safety evaluation of WCAP-13632-P, "Elimination of Pressure Sensor Response Time Testing Requirements," dated September 5, 1995 (ADAMS Accession No. ML18023A067), includes several conditions for its use in eliminating RTT requirements. Specifically, there are four actions required when licensees reference the WCAP report for elimination of RTT surveillance requirements. Explain whether or not these or other similar conditions will be included in prospective methodologies. If so, then explain how these conditions will be implemented and verified to assure acceptable application of the selected methodologies.

Enclosure