*General Directions: This Model SE provides the format and content to be used when preparing the plant specific SE of an LAR to adopt TSTF 563, Revision 0. The **bolded** bracketed information shows text that should be filled in for the specific amendment; individual licensees would furnish site-specific nomenclature or values for these bracketed items. The italicized wording provides guidance on what should be included in each section and should not be included in the SE.*

DRAFT MODEL SAFETY EVALUATION

BY THE OFFICE OF NUCLEAR REACTOR REGULATION

TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER

TSTF-563, REVISION 0

"REVISE INSTRUMENT TESTING DEFINITIONS TO INCORPORATE THE SURVEILLANCE FREQUENCY CONTROL PROGRAM"

USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

(CAC NO. MF9955, EPID L-2017-PMP-0006)

1.0 INTRODUCTION

By application dated **[enter date]** (Agencywide Documents Access and Management System (ADAMS) Accession No. **[MLXXXXXXXXX]**), **[as supplemented by letter(s) dated [enter date(s)]], [name of licensee]** (the licensee) submitted a license amendment request (LAR) for **[name of facility (abbreviated name), applicable units]**.

The amendment would revise the current instrumentation testing definitions of Channel Calibration**[[and Channel Functional Test] OR [, Channel Operational Test (COT), and Trip Actuation Device Operational Test (TADOT)]]** to permit determination of the appropriate frequency to perform the Surveillance Requirement (SR) based on the devices being tested in each step. The proposed changes are based on Technical Specifications Task Force (TSTF) Traveler TSTF-563, Revision 0, "Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program," dated May 10, 2017 (ADAMS Accession No. ML17130A819). The U.S. Nuclear Regulatory Commission (NRC or the Commission) issued a final safety evaluation (SE) approving TSTF-563, Revision 0, on **[enter date]** (ADAMS Accession No. **[MLXXXXXXXXX]**).

{NOTE: TSTF-563 is only applicable to plants that have already adopted TSTF-425 or have an approved SFCP that uses NEI 04-10.}

An SFCP was incorporated into the **[PLANT]** TS in a license amendment dated **[enter date]** (ADAMS Accession No. **[MLXXXXXXXXX]**).

[[The licensee has proposed variations from the TS changes described in TSTF-563. The variations are described in Section 2.2.1 of this SE and evaluated in Section 3.1.] OR [The licensee is not proposing any variations from the TS changes described in TSTF-563 or the applicable parts of the NRC staff's SE of TSTF-563.]]

[The supplemental letters dated [enter date(s)], provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on [enter date] (cite FR reference).]

2.0 REGULATORY EVALUATION

2.1 DESCRIPTION OF SURVEILLANCE FREQUENCY CONTROL PROGRAM AND INSTRUMENT TESTING

The technical specifications (TSs) require the surveillances for instrumentation channels to be performed within the specified frequency, using any series of sequential, overlapping, or total channel steps. TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b," revised the TSs to relocate all periodic surveillance frequencies to licensee control. Changes to the relocated surveillance frequencies are made in accordance with the TS program referred to as the Surveillance Frequency Control Program (SFCP). The SFCP allows a new surveillance frequency to be determined for the channel, but that frequency must consider all components in the channel and applies to the entire channel.

A typical instrument channel consists of many different components, such as sensors, rack modules, and indicators. These components have different short-term and long-term performance (drift) characteristics, resulting in the potential for different calibration frequency requirements. Under the current TSs, the most limiting component calibration frequency for the channel must be chosen when a revised frequency is considered under the SFCP. As a result, all components that makeup a channel must be calibrated at a frequency equal to the channel component with the shortest (i.e., most frequent) surveillance frequency.

Some channel components, such as pressure transmitters, are very stable with respect to drift and could support a substantially longer calibration frequency than the other components in the channel. Currently, the SRs in many plants are performed in steps (e.g., a pressure sensor or transmitter is calibrated during a refueling outage and the rack signal conditioning modules are calibrated while operating at power). The proposed change extends this concept to permit the surveillance frequency of each step to be determined under the SFCP based on the component(s) surveilled in the step instead of all components in the channel. This will allow each component to be tested at the appropriate frequency based on the component's long-term performance characteristics.

Allowing an appropriate surveillance frequency for performing a channel calibration on each component or group of components could reduce radiation dose associated with inplace calibration of sensors, reduce wear on equipment, reduce unnecessary burden on plant staff, and reduce opportunities for calibration errors.

2.2 PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS

Currently, the Channel Calibration**[[and Channel Functional Test] OR [, COT, and TADOT]]** may be performed by any series of sequential, overlapping or total channel steps. The proposed changes to the TSs would revise the definitions of Channel Calibration**[[and Channel Functional Test] OR [, COT, and TADOT]]** to indicate that the step must be performed within

the most limiting frequency for the components included in that step by adding the words ", and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step" at the end of the last sentence of each definition.

The following paragraph denotes the changes to the Channel Calibration definition. Changes are shown in italics:

{NOTE: For B&W, CE, and GE plant designs use this paragraph.}

> **[A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY and the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps*, ***and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step*.]**

{NOTE: For Westinghouse plant designs use this paragraph.}

> **[A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps*, ***and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step*.]**

{NOTE: For B&W, CE, and GE plant designs use this paragraph.}

[The following paragraph denotes the changes to the Channel Functional Test definition. Changes are shown in italics:

> **...The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total [channel] steps*, ***and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step*.]**

{NOTE: For Westinghouse plant designs use this paragraph.}

[The following paragraphs denote the changes to the COT and TADOT definitions. Changes are shown in italics:

> **A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY of all devices in the channel required for channel OPERABILITY. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints required for channel OPERABILITY such that the setpoints are within the necessary range and accuracy. The COT may be performed by means of any series of sequential, overlapping, or total channel steps*, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step*.**
>
> **A TADOT shall consist of operating the trip actuating device and verifying the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the necessary accuracy. The TADOT may be performed by means of any series of sequential, overlapping, or total channel steps*, and each step must be performed within the Frequency in the Surveillance Frequency Control Program for the devices included in the step*.]**

The various instrumentation functions in the TSs require surveillances to verify the correct functioning of the instrument channel. The proposed change extends the definition of instrumentation channel components to permit the surveillance frequency of each step to be determined under the SFCP based on the component(s) surveilled in the step instead of all components in the channel. This will allow each component to be tested at the appropriate frequency based on the component's long-term performance characteristics.

The proposed changes in the definition for instrument testing would allow the licensee to control the frequency of associated components being tested in each step. The SR for the overall instrumentation channel remains unchanged. The proposed change has no effect on the design, fabrication, use, or methods of testing the instrumentation channels and will not affect the ability of the instrumentation to perform the functions assumed in the safety analysis.

These instrumentation testing definitions state that, "[t]he [test type] may be performed by means of any series of sequential, overlapping, or total channel steps." The surveillance frequency of these subsets would be established based on the characteristics of the components in the step rather than the most limiting component characteristics in the entire channel. Each of these steps are evaluated in accordance with the SFCP.

2.2.1 Variations from TSTF-563

{NOTE: Technical reviewers and/or project manager are to assess the adequacy of any variations from the approved traveler and document their acceptability. Choose the applicable paragraphs based on information provided in the LAR.}

[The licensee is proposing the following variations from the TS changes described in TSTF-563 or the applicable parts of the NRC staff's SE of TSTF-563. [Describe the

variations and why TSTF-563 is still applicable.] These variations do not affect the applicability of TSTF-563 or the NRC staff's SE to the proposed LAR.]

[The [PLANT] TSs utilize different [numbering][and][titles] than the Standard Technical Specifications on which TSTF-563 was based. Specifically, [describe differences between the plant-specific TS numbering and/or titles and the TSTF-563 numbering and/or titles.] These differences are editorial and do not affect the applicability of TSTF-563 to the proposed LAR.]

[The [PLANT] design is different than the model plant assumed in the Standard Technical Specifications, but the TSTF-563 justification and the NRC staff's SE are still applicable. [Describe differences and why TSTF-563 is still applicable.]]

2.3 APPLICABLE REGULATORY REQUIREMENTS AND GUIDANCE

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(a)(1) requires each applicant for a license authorizing operation of a utilization facility to include in the application proposed TSs.

The regulation at 10 CFR 50.36(b) requires:

> Each license authorizing operation of a …utilization facility …will include technical specifications. The technical specifications will be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to [10 CFR] 50.34 [“Contents of applications; technical information”]. The Commission may include such additional technical specifications as the Commission finds appropriate.

The categories of items required to be in the TSs are provided in 10 CFR 50.36(c). One such category is SRs, which are defined in 10 CFR 50.36(c)(3) as “requirements relating to test, calibration, or inspection to assure that the 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 regulation at 10 CFR 50.36(c)(5) requires TSs to include administrative controls, which “are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.”

Traveler TSTF-425 revised and relocated most periodic surveillance frequencies to licensee control. Changes to the relocated surveillance frequencies are made in accordance with the SFCP. The SFCP requires that changes to the relocated frequencies be made in accordance with NRC staff approved topical report NEI 04-10.

Topical report NEI 04-10 describes an evaluation process and a multi-disciplinary plant decisionmaking panel that considers the detailed evaluation of proposed surveillance frequency revisions. The evaluations are based on operating experience, test history, manufacturers’ recommendations, codes and standards, and other deterministic factors, in conjunction with risk insights. The evaluation considers all components being tested by the SR. Process elements are included for determining the cumulative risk impact of the changes, updating the licensee’s

probabilistic risk assessment (PRA) models, and for imposing corrective actions, if necessary, following implementation of a revised frequency.

The NRC staff's guidance for the review of TSs is in Chapter 16.0, "Technical Specifications," of NUREG-0800, Revision 3, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition" (SRP), March 2010 (ADAMS Accession No. ML100351425). As described therein, as part of the regulatory standardization effort, the NRC staff has prepared STS for each of the LWR nuclear designs. Accordingly, the NRC staff's review includes consideration of whether the proposed changes are consistent with the applicable reference STS (i.e., the current STS), as modified by NRC-approved Travelers. In addition, the guidance states that comparing the change to previous STS can help clarify the TS intent.

Regulatory Guide (RG) 1.174, Revision 2, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis" (ADAMS Accession No. ML100910006), describes an acceptable risk-informed approach for assessing the nature and impact of proposed permanent licensing basis changes by considering engineering issues and applying risk insights. This regulatory guide also provides risk acceptance guidelines for evaluating the results of such evaluations.

RG 1.177, Revision 1, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications" (ADAMS Accession No. ML100910008), describes an acceptable risk-informed approach specifically for assessing proposed TS changes.

RG 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" (ADAMS Accession No. ML090410014), describes an acceptable approach for determining the technical adequacy of PRAs.

The NRC staff's guidance for evaluating the technical basis for proposed risk-informed changes is provided in SRP, Chapter 19, Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance" (ADAMS Accession No. ML071700658). The NRC staff's guidance on evaluating PRA technical adequacy is provided in SRP, Chapter 19, Section 19.1, Revision 3, "Determining the Technical Adequacy of Probabilistic Risk Assessment for Risk-Informed License Amendment Requests After Initial Fuel Load" (ADAMS Accession No. ML12193A107). More specific guidance related to risk-informed TS changes is provided in SRP, Chapter 16, Section 16.1, Revision 1, "Risk-Informed Decision Making: Technical Specifications" (ADAMS Accession No. ML070380228), which includes changes to surveillance test intervals (STIs) (i.e., surveillance frequencies) as part of risk-informed decisionmaking. Section 19.2 of the SRP references the same criteria as RG 1.177, Revision 1, and RG 1.174, Revision 2, and states that a risk-informed application should be evaluated to ensure that the proposed changes meet the following key principles:

- The proposed change meets the current regulations, unless it explicitly relates to a requested exemption or rule change.

- The proposed change is consistent with the defense-in-depth philosophy.

- The proposed change maintains sufficient safety margins.

- When proposed changes result in an increase in risk associated with core damage frequency or large early release frequency, the increase(s) should be small and consistent with the intent of the Commission's Safety Goal Policy Statement.

- The impact of the proposed change should be monitored using performance measurement strategies.

{NOTE: Choose applicable STS}
[U.S. Nuclear Regulatory Commission, "Standard Technical Specifications, Babcock and Wilcox Plants," NUREG-1430, Volume 1, "Specifications," and Volume 2, "Bases," Revision 4.0, dated April 2012 (ADAMS Accession Nos. ML12100A177 and ML12100A178, respectively).

U.S. Nuclear Regulatory Commission, "Standard Technical Specifications, Westinghouse Plants," NUREG-1431, Volume 1, "Specifications," and Volume 2, "Bases," Revision 4.0, dated April 2012 (ADAMS Accession Nos. ML12100A222 and ML12100A228, respectively).

U.S. Nuclear Regulatory Commission, "Standard Technical Specifications, Combustion Engineering Plants," NUREG-1432, Volume 1, "Specifications," and Volume 2, "Bases," Revision 4.0, dated April 2012 (ADAMS Accession Nos. ML12102A165 and ML12102A169, respectively).

U.S. Nuclear Regulatory Commission, "Standard Technical Specifications, General Electric BWR/4 Plants" NUREG-1433, Volume 1, "Specifications," and Volume 2, "Bases," Revision 4.0, dated April 2012 (ADAMS Accession Nos. ML12104A192 and ML12104A193, respectively).

U.S. Nuclear Regulatory Commission, "Standard Technical Specifications, General Electric BWR/6 Plants" NUREG-1434, Volume 1, "Specifications," and Volume 2, "Bases," Revision 4.0, dated April 2012 (ADAMS Accession Nos. ML12104A195 and ML12104A196, respectively).]

3.0 TECHNICAL EVALUATION

Revising the frequency of a Channel Calibration**[[and Channel Functional Test] OR [, COT, and TADOT]]** instrument channel under the SFCP requires assurance that component performance characteristics, such as drift between each test, will not result in undetected instrument errors that exceed the assumptions of the safety analysis and supporting instrument loop uncertainty calculations. These requirements are consistent with the methodology described in NEI 04-10, which the SFCP requires to be followed. The SFCP does not permit changes to the TS Allowable Values or Nominal Trip Setpoints; but allows only the surveillance frequency to be changed when determined permissible by NEI 04-10. Therefore, prior to extending the test intervals for an instrument channel component or components associated with a given calibration step, the component performance characteristics must be evaluated to verify the Allowable Value or Nominal Trip Setpoint will still be valid and to establish a firm technical basis supporting the extension. In addition, each change must be reviewed by the licensee to ensure the applicable uncertainty allowances are conservative (bounding) (e.g., sensor drift, rack drift, indicator drift). Documentation to support the changes shall be retained per the guidance in NEI 04-10.

Five key safety principles that must be evaluated before changing any surveillance frequency are identified in Section 3.0 of NEI 04-10. Principle 3 requires confirmation of the maintenance of safety margins, which, in this case, includes performance of deterministic evaluations to verify preservation of instrumentation trip setpoint and indication safety margins.

The evaluation methodology specified in NEI 04-10 also requires consideration of common cause failure effects and monitoring of the instrument channel component performance following the frequency change to ensure channel performance is consistent with the analysis to support an extended frequency.

The method of evaluating a proposed surveillance frequency change is not dependent on the number of components in the channel. Each step needs to be evaluated to determine the acceptable surveillance frequency for that step. The proposed change to permit changing the surveillance frequency of channel component(s) does not affect the test method or evaluation method. The requirement to perform a Channel Calibration, Channel Functional Test, COT, or TADOT on the entire channel is not changed.

For example, an evaluation in accordance with NEI 04-10 may determine that a field sensor (e.g., a transmitter) should be calibrated every 48 months, the rack modules should be calibrated every 30 months, and the indicators should be calibrated every 24 months. Under the current TS requirements, all devices in the channel must be calibrated every 24 months. However, under the proposed change, sensors, rack modules, and indicators would be calibrated at the appropriate frequency for the tested devices. As required by the Channel Calibration definition, the test would still encompass all devices in the channel required for channel operability.

The NEI 04-10 methodology is used to evaluate surveillance frequency changes to determine if such SR extensions could be applied. Process elements are used to determine the cumulative risk impact of changes, updating the PRA, and imposition of corrective actions, if needed, following implementation. Several steps are required by NEI 04-10, Step 7, to be evaluated prior to determining the acceptability of changes. These steps include history of surveillance tests, industry and plant specific history, impact on defense-in-depth, vendor recommendations, required test frequencies for the applicable codes and standards, ensuring that plant licensing basis would not be invalidated and other factors. The NRC staff finds these measures acceptable in determining the SR extensions.

In addition, Step 16 of Section 4.0 of NEI 04-10 requires an Independent Decisionmaking Panel (IDP) to review the cumulative impact of all STI changes over a period of time. This is also required by RGs 1.174 and 1.177. The IDP is comprised of the site Maintenance Rule Expert Panel, Surveillance Test Coordinator, and Subject Matter Expert who is a cognizant system manager or component engineer. Based on the above information, the NRC staff finds that the setpoint changes will be tracked in an acceptable manner.

Licensees with an SFCP may currently revise the surveillance frequency of instrumentation channels. The testing of these channels may be performed by means of any series, sequential, overlapping, or total channel steps. However, all required components in the instrumentation channel must be tested in order for the entire channel to be considered Operable.

The NRC staff notes that industry practice is to perform instrument channel surveillances, such as Channel Calibrations and Channel Functional Tests, using separate procedures based on

the location of the components. Each of these procedures may be considered a "step." The results of all these procedures are used to satisfy the SR using the existing allowance to perform it "by means of any series of sequential, overlapping, or total channel steps." The proposed changes would allow for determining an acceptable surveillance frequency for each step.

The NRC staff notes that the NEI 04-10 methodology includes the determination of whether the structure, system, and components (SSCs) affected by a proposed change to a surveillance frequency are modeled in the PRA. Where the SSC is directly or implicitly modeled, a quantitative evaluation of the risk impact may be carried out. The methodology adjusts the failure probability of the impacted SSCs based on the proposed change to the surveillance frequency. Where the SSC is not modeled in the PRA, bounding analyses are performed to characterize the impact of the proposed change to the surveillance frequency. Potential impacts on the risk analyses due to screening criteria and truncation levels are addressed by the requirements for PRA technical adequacy, consistent with the guidance contained in RG 1.200, and by sensitivity studies identified in NEI 04-10. The licensee is not proposing to change the methodology, or the acceptance criteria for extending STIs, and licensees will need to changes in the frequency for performing each of the steps in the instrumentation surveillance test per the methodology in NEI 04-10.

Therefore, the NRC staff concludes that the proposed change determine an acceptable test frequency for individual steps within instrumentation channel surveillance tests is acceptable because any extended STIs will be developed within the established constraints of the SFCP and NEI 04-10.

The regulatory requirements in 10 CFR 50.36 are not specific regarding the frequency of performing surveillance tests. The proposed change only affects the frequency of performance and does not affect the surveillance testing method or acceptance criteria. Therefore, the proposed change is consistent with the surveillance testing requirements of 10 CFR 50.36.

PRA Acceptability

The guidance in RG 1.200 states that the quality of a licensee's PRA should be commensurate with the safety significance of the proposed TS change and the role the PRA plays in justifying the change. That is, the greater the change in risk or the greater the uncertainty in that risk as a result of the requested TS change, or both, the more rigor that should go into ensuring the quality of the PRA.

The NRC staff will have performed an assessment of the PRA models used to support the approved SFCP that uses NEI 04-10, using the guidance of RG 1.200 to assure that the PRA models are capable of determining the change in risk due to changes to surveillance frequencies of SSCs, using plant-specific data and models. Capability Category II of the NRC-endorsed PRA standard is the target capability level for supporting requirements for the internal events PRA for this application. Any identified deficiencies to those requirements are assessed further to determine any impacts to proposed decreases to surveillance frequencies, including the use of sensitivity studies where appropriate, in accordance with NEI 04-10.

The SFCP permits revising of the surveillance frequency for instrumentation channels. The NRC staff evaluated whether NEI 04-10 can be applied to subsets in an instrument channel when the SFCP currently specifies a surveillance interval that is applied to the entire channel.

The NRC staff notes that the current channel surveillance may be performed by means of any series of sequential, overlapping, or total channel steps. In practice, this means that a channel is divided into subsets and each subset is tested separately. Therefore, the current instrument channel testing is already composed of a sequence of individual tests.

The instrument function may be modeled in the PRA differently depending on the site and the function (e.g., channel may be modeled individually, subsets may be modeled, or the channel function may be modeled as a single entity). There are different steps through the evaluation methodology in NEI 04-10 that could be used based on the different PRA modeling approaches. The appropriate modeling of these different approaches is included in the NRC staff's review of the PRA modeling during the review of the application to implement an SFCP that uses NEI 04-10.

The licensee is using a PRA that was used to support their application that implemented an SFCP that uses NEI 04-10. The amendment will change the capability of the licensee to change the surveillance frequency of an entire channel to now change the frequency of each subset of the channel. The NRC staff finds that changes to the surveillance frequency caused by defining and using individual, testable component subsets can be appropriately evaluated with the current SFCP and the current PRAs. The NRC staff finds that the risk-informed methodology review and the PRA acceptability review that was performed during the review of the licensee's application to implement an SFCP that uses NEI 04-10 is adequate.

The NRC staff determined that the proposed changes to the TS meet the standards for TS in 10 CFR 50.36(b). The regulations at 10 CFR 50.36 require that TSs include items in specified categories, including SRs. The proposed changes modify the definitions applicable to instrumentation channel components but do not alter the technical approach that was approved by the NRC in NEI 04-10, and the TSs, as revised, continue to specify the appropriate SRs for tests and inspections to ensure the necessary quality of affected SSCs is maintained.

Additionally, the changes to the TS were reviewed and found to be technically clear and consistent with customary terminology and format in accordance with SRP Chapter 16.0. The NRC staff reviewed the proposed changes against the regulations and concludes that the changes continue to meet the requirements of Sections 50.36(b), 50.36(c)(3), and 50.36(c)(5), of 10 CFR, for the reasons discussed above, and thus provide reasonable assurance that adoption of these TSs will have the requisite requirements and controls to operate safely. Therefore, the NRC staff concludes that the proposed TS changes are acceptable.

[3.1 VARIATIONS FROM TSTF-563

The licensee described variations from TSTF-563 in Section 2.2 of the LAR. The licensee provided justification for the proposed variations and exceptions. The staff reviewed the justifications and concluded the variations are [not] acceptable because….

The [PLANT] TSs utilize different [numbering][and][titles] than the Standard Technical Specifications on which TSTF-563 was based. The NRC staff agrees these differences are editorial and do not affect the applicability of TSTF-563 to the proposed LAR.]

4.0 STATE CONSULTATION

{This section is to be prepared by the plant project manager.}

In accordance with the Commission's regulations, the **[Name of State]** State official was notified of the proposed issuance of the amendment(s) on **[date]**. The State official had **[no]** comments. **[If comments were provided, they should be addressed here.]**

5.0 ENVIRONMENTAL CONSIDERATION

{This section is to be prepared by the plant project manager in accordance with current procedures.}

6.0 CONCLUSION

{This section is to be prepared by the plant project manager.}

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment(s) will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

{Optional section to be prepared by the PM and primary reviewers. If document is publicly available, the ADAMS Accession No. should be listed.}

{NOTE: These are the principal contributors for the model SE of the traveler. Replace these names with those who prepared the plant-specific SE.}

Principal Contributors: M. Chernoff, NRR/DSS
G. Singh, NRR/DE
J. Evans, NRR/DRA

Date: September 20, 2018