

January 31, 1975

Guide for the Development and Implementation of
Standard Technical Specifications (STS)

The guidelines to be followed by the Regulatory staff for the development of STS and the implementation of these on individual plants are set forth below. The objectives of this standardization effort are to provide Technical Specifications (TS) that: (1) have a common format and technical approach, (2) will provide all limits and requirements necessary for safe plant operation, and (3) will facilitate the development of TS's for specific plants.

The development of STS will fully utilize the experience from the operation and inspection history of operating plants. This experience will be factored into the STS to assure that they are compatible with safe operation and do not present operating restrictions or operating requirements which would unduly affect schedules, cost or plant availability. In-depth consultation with the licensing and inspection staff of regulatory, the appropriate NSS vendor, and with any individual utilities or utility groups or any other individual or group having an interest and that wish to do so will be utilized in the development of STS packages.

The implementation of STS will be such that, consistent with the important objectives of achieving standardization in this area and upgrading technical specifications to uniformly reflect current requirements, it does not have undue impact on the schedule of plants

800 1150688

in the Licensing process and does not impose undue training or procedural obstacles.

Development

The approach to be taken in the development of the STS is to review and evaluate the basis for all technical specifications currently in use to determine their need and applicability. Wherever the necessity or applicability of a specific technical specification cannot be established, it is to be deleted; conversely, where an adequate basis for necessity exists for a new TS, it is to be added.

The format to be used shall provide maximum clarity, specify exactly when (during various modes of reactor operation) each technical specification is applicable, delineate corrective action, and provide common language to minimize the possibility of misinterpretation in the licensing process, plant operation, and the Office of Inspection and Enforcement inspection. Within regulatory, the STS will be developed in concept and format by the Division of Reactor Licensing, reviewed for need and technical acceptability by the Division of Technical Review, and reviewed for applicability and inspectability by the Office of Inspection and Enforcement. The STS so developed will be made available to the appropriate NSSL and interested utilities for review as to technical need and adequacy, compatibility with operating practices, and impact on plant availability commensurate with plant safety. Development of the STS shall make maximum use of licensing and operating experiences to achieve usable and technically sound STS.

A STS for each LWR class of plant (e.g., for each LWR NSSS) will be developed; differences between each of these will be limited strictly to those required by differences in design and operating requirements.

Implementation

The STS for each class of plant will be applied to and utilized by the earliest plant in the OL licensing process where such application would not cause undue hardship to the utility or delay licensing action. This impact will be evaluated considering the expected OL issuance date, time required for the utility to train operations personnel in TS matters, and time and effort required to complete procedures which implement or reference the TS. All OL's issued subsequent to this earliest plant will utilize the STS as modified by any changes found necessary as a result of application to the lead and other plants, and modified, to the extent necessary, to reflect any differences in plant design, operating organization or operating requirements.

Implementation of the STS on a lead case is an important step in this standardization effort. A previously licensed operating plant may be utilized for this purpose if the next OL issuance for that class of plant is not expected in the reasonable future, but only with the consent and cooperation of the licensee. The STS developed using an operating plant as the lead plant shall be applied to that plant on a time scale for implementation that factors in training, procedures, and turnover time for new or differing requirements.

There are no plans for the general backfitting of STS to operating plants except those operating plants used as lead plants for STS development. For utilities having plants now operating, with additional unit(s) to be licensed in the future that will have STS, it will be advantageous to utilize STS for all units at the same site, particularly if all units are of the same general design. If the STS are to be applied to the previously licensed units, the time scale for implementation will duly consider the problems associated with such a changeover.

With respect to new requirements, the STS may contain certain requirements not included in previously issued technical specifications. These new requirements may be based on additional requirements important to safety that have been identified in new or revised Regulatory Guides or on additional requirements that evolved from evaluation of operating experience. In addition, the STS will include appropriate surveillance requirements to ensure that each limiting condition for operation (LCO) is met. This approach will result in some additional surveillance requirements as compared to previously issued specifications, and some persons may view these new surveillance requirements as "ratcheting". These requirements are, however, needed for safety and are consistent with and required by 10 CFR 50.36. It is therefore true that changes of this type are not unique to the STS program and would be necessary regardless of whether STS or custom specifications are used.

Maintenance

The STS package for any class of plant will be maintained up-to-date through the following inputs:

- a. Revised regulatory requirements,
- b. New safety related technical considerations,
- c. Licensing experiences, including proposed TS changes by licensees,
- d. Inspection experiences,
- e. Operating experience.

It should be noted that the STS package for any class of plant should contain all of the TS's that could be applicable to that class of plant. For example, a certain class of plant could utilize any one of several containment concepts, depending on technical requirements and utility preference; technical specifications for each possible containment shall be included in the STS package. Similarly where equipment options might require differing technical specifications, technical specifications for each option should be included. Therefore, in applying a STS package to a particular plant, certain TS would be deleted as not applicable.

A master copy of the STS package for each class of plant will be kept current to reflect all changes that are found desirable. Where changes are deemed necessary in order to provide substantial, additional protection to the health and safety of the public, the changes will be made in the master copy and all licensees having STS of that class will be notified and requested to propose appropriate revisions to their STS. Where changes are deemed desirable for reasons of clarity, better operations application, or diminished requirements, the changes will be made in the master copy and all affected utilities will be notified, so that they may apply for such changes to their TS if they wish.

From this, it can be seen that although the title of the STS packages include the word "standard", they essentially never will be a final document. Rather, they will be "living" documents that can always be changed for good cause, as can all issued TS that were based on the STS packages. It is certainly reasonable to expect that changes to the STS packages and the TS that are based on them should become much fewer in number as they are refined by application and experience.