



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

November 6, 1989

Mr. Edward Sterling
Chairman CEOG
Arizona Public Service Company
Mail Station 7034/Bldg B
11226 N. 23rd Avenue
Phoenix, Arizona 85029

Dear Mr. Sterling:

SUBJECT: NRC EVALUATION OF CEOG TOPICAL REPORT CEN-327, "RPS/ESFAS
EXTENDED TEST INTERVAL EVALUATION"

The purpose of this letter is to provide the staff's evaluation of CE Topical Report CEN-327 and its supplement prepared by Combustion Engineering for the Combustion Engineering Owners' Group (CEOG) Technical Specifications Subcommittee. This topical report and supplement were submitted by letters dated June 2, 1986, and March 3, 1989, respectively. They present justification in the form of probabilistic risk analysis for extending the surveillance test intervals (STI) for RPS trip paths and ESFAS channels and actuation logic from one month to 90 days on a sequential test schedule.

The staff finds the reports acceptable for justifying the proposed extensions in STI for the RPS/ESFAS. Therefore, the staff agrees that STI for the RPS and for ESFAS can be extended for all CE plants (except Maine Yankee) to the requested interval contingent on the licensee in each case confirming that instrument drift occurring over the proposed STI would not cause the setpoint values to exceed those assumed in the safety analysis and specified in the Technical Specifications. The licensees must confirm that they have reviewed instrument drift information for each instrument channel involved and have determined that drift occurring in that channel over the period of extended STI will not cause the setpoint value to exceed the allowable value as calculated for that channel by their setpoint methodology. Each licensee should have onsite records of the as-found and as-left values showing actual calculations and supporting data for planned future staff audits. The records should consist of monthly data over a period of the last 2 to 3 years with the current plant-specific setpoint methodology used to derive the safety margins.

We are enclosing a markup of the Millstone 2 Technical Specifications that reflect the proposed changes and the results of our review. This model should expedite the plant specific submittals and the subsequent staff review.

In accordance with procedures established in NUREG-0390, "Topical Reports Review Status," we request that the CE Owners Group publish accepted revisions of CEN-327 and its supplement within three months of receipt of this letter. The accepted versions should (1) incorporate this letter and the enclosed Safety Evaluation Report between the title page and the abstract and (2) include an - A (designated accepted) following the report identification symbol.

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Should our acceptance criteria or regulations change so that our conclusions as to the acceptability of the report are no longer valid, the CE Owners Group and/or the applicants referencing this topical report will be expected to revise and resubmit their respective documentation, or submit justification for the continued applicability of the topical report without revision of its documentation.

Should you have any questions regarding the matters discussed above on the content of the enclosed SER, please contact Sang Rhoo of my staff on (301) 492-0779.

Sincerely,

ORIGINAL SIGNED BY A. C. THADANI

Ashok C. Thadani, Director
Division of Systems Technology
Office of Nuclear Reactor Regulation

Enclosures:
As stated

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