



RELEASED TO THE PDR  
1/10/94  
Date initials

December 10, 1993

**POLICY ISSUE**  
(Information)

SECY-93-339

**FOR:** The Commissioners  
**FROM:** James M. Taylor  
Executive Director for Operations  
**SUBJECT:** ISSUANCE OF GENERIC LETTER 93-XX, "RELOCATION OF TECHNICAL SPECIFICATION TABLES OF INSTRUMENT RESPONSE TIME LIMITS"

**PURPOSE:**

To inform the Commission of the staff's intent to issue the enclosed generic letter in accordance with the guidance in a memorandum of December 20, 1991, from Samuel J. Chilk to James M. Taylor relating to SECY-91-172, "Regulatory Impact Survey Report -- Final." The purpose of the generic letter is to recommend, but not to impose, a line-item technical specification improvement to relocate the tables of instrument response time limits from the plant technical specifications to the licensee's updated final safety analysis report (FSAR).

**DISCUSSION:**

The staff proposed this generic letter to address a change that it allowed in the technical specifications of the last group of plants that were issued an operating license. The change allows licensees to control changes to the former technical specification tables of response time limits under the provisions of Section 50.59 of Title 10 of the Code of Federal Regulations when they are relocated to the FSAR. The generic letter includes a model specification to help licensees and project managers process license amendments to implement this change. The staff implemented a similar modification in the improved standard technical specifications issued in September 1992 for each nuclear steam supply system vendor.

The staff met with the Committee To Review Generic Requirements (CRGR) on February 23, 1993, to review the proposed generic letter. The generic letter, as approved by the CRGR, and the supporting documentation are available in the Public Document Room (PDR), 2120 L Street, NW, Washington, DC 20555, under Accession Number 9212150291.

A notice of opportunity for public comment was published in the Federal Register on April 7, 1993. The public comment period expired on May 24, 1993. The NRC received comments from four licensees. Copies of the comments are

CONTACT: Tom Dunning, NRR  
504-1189

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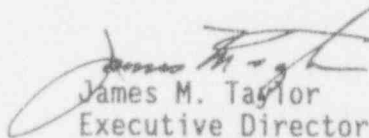
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available in the PDR. A copy of the staff's detailed evaluation of these comments is available in the NRC Central Files and will be placed in the PDR after the staff issues the generic communication.

Three licensees suggested that the guidance provided in Enclosure 1 of the generic letter which was inadvertently omitted from the model technical specification in Enclosure 2 be included in the latter. Two licensees suggested that the generic letter specifically indicate that the model technical specification is applicable to all plants. Another licensee requested a clarification related to the status of information in tables that would be relocated to a licensee's updated FSAR. The staff modified the generic letter to incorporate the suggested clarifications, as appropriate.

The staff intends to issue the generic letter approximately 10 working days after the date of this Commission Paper.

  
James M. Taylor  
Executive Director  
for Operations

Enclosure:  
Proposed Generic Letter

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WASHINGTON, D.C. 20555-0001

TO: ALL HOLDERS OF OPERATING LICENSES FOR NUCLEAR POWER REACTORS

SUBJECT: RELOCATION OF TECHNICAL SPECIFICATION TABLES OF INSTRUMENT RESPONSE TIME LIMITS (Generic Letter 93- )

The U.S. Nuclear Regulatory Commission (NRC) is issuing this guidance for requesting a license amendment to relocate tables of instrument response time limits from technical specifications (TS) to the updated final safety analysis report. The NRC developed this line-item TS improvement in response to TS proposals by applicants for operating licenses.

Licensees that plan to adopt this line-item TS improvement are encouraged to propose TS changes consistent with the guidance given in Enclosures 1 and 2. NRC project managers will review the amendment requests to verify that they conform to this guidance. Please contact your project manager or the contact indicated herein if you have any questions on this matter.

Licensee action to propose TS changes under the guidance of this generic letter is voluntary. Therefore, such action is not a backfit under the provisions of Section 50.109 of Title 10 of the Code of Federal Regulations (10 CFR). The following information, although not requested under the provisions of 10 CFR 50.54(f), would help the NRC evaluate costs and benefits for licensees who propose the TS changes described in this generic letter:

- licensee time and costs to prepare the amendment request
- estimate of the long-term costs or savings accruing from this TS change

Office of Management and Budget Clearance Number 3150-0011, which expires June 30, 1994, covers this request. The estimated average number of burden hours is 40 person-hours per licensee response, including those needed to assess the recommendations, search data sources, gather and analyze the data, and prepare the required letters. Send comments on this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Information and Records Management Branch (MNBB 7714), Division of Information Support Services, Office of Information Resources Management, U.S. Nuclear Regulatory Commission,

Contact: T. G. Dunning, NRR  
(301) 504-1189

Washington, DC 20555, and to Ronald Minsk, Office of Information and Regulatory Affairs (3150-0011), NEOB-3019, Office of Management and Budget, Washington, DC 20503.

Sincerely,

L. J. Callan  
Acting Associate Director for Projects  
Office of Nuclear Reactor Regulation

Enclosures:  
As stated

Guidance for a Proposed License Amendment To Relocate  
Tables of Instrument Response Time Limits From Technical Specifications  
to the Updated Final Safety Analysis Report

### Introduction

The NRC is issuing the following guidance for preparing a proposed license amendment to relocate the tables of response time limits for the reactor trip system (RTS) and the engineered safety features actuation system (ESFAS) instruments from technical specifications (TS) to the updated final safety analysis report (FSAR). The NRC has already implemented this line-item TS improvement for recently issued operating licenses and in the improved standard technical specifications.

### Discussion

The limiting conditions for operation (LCOs) for RTS and ESFAS instruments require that these systems be operable with response times as specified in TS tables for each of these systems. The surveillance requirements specify that licensees test these systems and verify that the response time of each function is within its limits. Relocating the tables of the RTS and ESFAS instrument response time limits from the TS to the updated FSAR will not alter these surveillance requirements. The updated FSAR will now address the response time limits for the RTS and ESFAS instruments, including those channels for which the response time limit is indicated as "NA"; that is, a response time limit is not applicable. The updated FSAR will also clarify response time limits where footnotes are included in the tables that describe how those limits are applied. This TS change also allows the licensee to administratively control changes to the response time limits for the RTS and ESFAS instruments in accordance with the provisions of 10 CFR 50.59 without the need to process a license amendment request.

The LCOs for the RTS and the ESFAS typically specify that the associated instruments "shall be OPERABLE with RESPONSE TIMES as shown in Table 3.3-2" (RTS) or "Table 3.3-5" (ESFAS). An acceptable change to the LCOs would be to remove the reference to response times and simply state that this instrumentation "shall be OPERABLE" as shown for the markup of the Westinghouse standard technical specifications in Enclosure 2. This change is applicable to all plants and is compatible with relocating the referenced tables.

The surveillance requirements specify that the response time of each trip function is to be demonstrated to be within its limit at the specified frequency and do not reference the tables of response time limits. Therefore, the surveillance requirements specified in this manner need not be modified to implement this change. However, a footnote in the table of response time limits for the RTS states that neutron detectors are exempt from response time testing. To retain this exception, which is stated in the table being removed from the TS, the surveillance requirements for the RTS should be modified to add the following statement:

Neutron detectors are exempt from response time testing.

Each licensee that wishes to implement this line-item TS improvement should confirm that the plant procedures for response time testing include acceptance criteria that reflect the RTS and ESFAS response time limits in the tables being relocated from the TS to the updated FSAR. The licensee should also provide a commitment to include the RTS and ESFAS response time limits in the next update of the FSAR.

Licensees would submit any subsequent changes to these limits in the FSAR as an update of the FSAR as required by 10 CFR 50.71(e). Related changes to plant procedures would be subject to the provisions that control changes to plant procedures as stated in the administrative controls section of the TS.

## Model Technical Specifications

The model technical specifications are based on the "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," NUREG-0452, Revision 4a; however, the indicated changes are applicable for all plants.

3/4.3.1 REACTOR TRIP SYSTEM INSTRUMENTATION

3.3.1 As a minimum, the Reactor Trip System instrumentation channels and interlocks of Table 3.3-1 shall be OPERABLE. ~~with RESPONSE TIMES as shown in Table 3.3-2.~~

*(Change TS 3.3.1 as shown)*

4.3.1.2 The REACTOR TRIP SYSTEM RESPONSE TIME of each reactor trip function shall be demonstrated to be within its limit at least once per 18 months. **Neutron detectors are exempt from response time testing.** Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific Reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

*(Make addition to TS 4.3.1.2 as shown in Bold typeface)*

3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4. ~~and with RESPONSE TIMES as shown in Table 3.3-5.~~

*(Change to TS 3.3.2 as shown)*

4.3.2.2 The ENGINEERED SAFETY FEATURES RESPONSE TIME of each ESFAS function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ESFAS function as shown in the "Total No. of Channels" column of Table 3.3-3.

*(Make no change to TS 4.3.2.2)*