



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

August 9, 1990

MEMORANDUM FOR: Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

FROM: James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

William T. Russell
Associate Director for Inspection
and Technical Assessment
Office of Nuclear Reactor Regulation

SUBJECT: MPA D017 COMPLETION (TAC NO. 40555)

The purpose of this memorandum is to document closeout of MPA D017, "Technical Specifications Defining Operability For Safety Systems." Factors supporting this memorandum include the following:

By letter dated April 10, 1980, the NRC issued Generic Letter 80-30. The purpose of that generic letter was to (1) clarify the meaning of the term Operable as it applies to the single failure criterion for safety systems in power reactors and (2) ensure that licensees have technical specifications which require plant operators to take specific actions to assure that maintenance activities do not defeat required safety features. MPA D017 was assigned to track the implementation of the required technical specification changes.

In concert with the plant PMs, the Lead PM has verified that the implementation process is complete for all operating nuclear power plants.

At the time Generic Letter 80-30 was issued, MPA D017 was applicable to all then operating plants. Attachment 1 is a list of plants for which TACs were opened and for which the necessary entries (Licensing Action Complete and Implementation Complete) have been made in SIMS for closeout of MPA D017.

Subsequent to the issuance of Generic Letter 80-30, the four generic Standard Technical Specification documents were modified to include the provisions of this Generic Letter and the technical specifications for all new operating licenses have contained these requirements. Attachment 2 is a list of plants in this category. TACs were not opened for these plants.

Since Watts Bar Units 1 and 2, Bellefonte Units 1 and 2, and Comanche Peak Units 1 and 2 were not yet licensed when James G. Partlow's November 1, 1989, memorandum of instructions regarding MPA's was issued, TACs were opened for those six plants. MPA D017 will be tracked as a licensing activity for those plants and will be addressed in Supplemental Safety Evaluation Reports (completed in SSER 24 for Comanche Peak Unit 1). However, in accordance with James G. Partlow's November 1, 1989 memorandum, this MPA may be closed out and the Lead PM will continue to monitor this MPA for the remaining five plants until their final closeout.

CONTACT:
Donald S. Brinkman, NRR
49-21402

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Attachment 3 is a WISP printout of MPA D017. This printout confirms completion of this MPA by showing that the Licensing Action Complete and Licensee Implementation entries for all plants in Attachment 1 are complete (except as noted above for Watts Bar Units 1 and 2, Bellefonte Units 1 and 2, and Comanche Peak Unit 2). TAC No. 40555 which was used for Lead PM activities associated with MPA D017 will be closed following issuance of this memorandum.

Attachment 4 is a requested revision to the narrative description of MPA D017 in SIMS. The requested revision will clarify the resolution of MPA D017.

The Lead PM for this activity was Donald S. Brinkman.

ORIGINAL SIGNED BY:
James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

ORIGINAL SIGNED BY:
William T. Russell
Associate Director for Inspection
and Technical Assessment
Office of Nuclear Reactor Regulation

Attachments:

1. Attachment 1 - Plants For Which The Necessary SIMS Entries Have Been Made
2. Attachment 2 - Plants For Which Necessary Actions Were Completed With Issuance Of Operating License
3. Attachment 3 - WISP Printout of MPA D017
4. Attachment 4 - Memo for L. Barnett, from D. Brinkman, Subject: "Revision of Narrative Description of MPA D017 in SIMS," dated August 2, 1990.

Distribution:

Central File
NRC/~~Local~~ PDRS
PDI-1 Reading
SVarga
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AMendiola
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ATA:DRSP
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RACapra
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RI
AD:RI
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DRP
DIR:DRP
SVarga
8/7/90

ADP
JPartlow
8/8/90

ADT
WRussell
8/9/90

*See previous concurrence

DOCUMENT NAME: MPA D017 MEMO/40555

#2
8/9

ATTACHMENT 1

Plants For Which The Necessary SIMS Entries Have Been Made

<u>Plant</u>	<u>Licensing Action Complete</u>	<u>Implementation Complete</u>
Arkansas 1	06/16/81C	06/01/81C
Arkansas 2	03/03/81C	03/01/81C
Beaver Valley 1	02/05/81C	01/01/81C
Big Rock Point	10/02/85C	10/02/85C
Browns Ferry 1	02/06/81C	01/01/81C
Browns Ferry 2	02/06/81C	02/01/81C
Browns Ferry 3	02/06/81C	01/01/81C
Brunswick 1	12/29/80C	12/29/80C
Brunswick 2	12/29/80C	12/29/80C
Calvert Cliffs 1	04/03/81C	09/04/81C
Calvert Cliffs 2	04/03/81C	09/04/81C
Comanche Peak 1	04/17/90C	04/17/90C
D.C. Cook 1	05/12/81C	07/01/81C
D.C. Cook 2	05/11/81C	07/01/81C
Cooper	05/19/81C	05/01/81C
Crystal River 3	07/10/81C	07/10/81C
Davis Besse 1	07/19/84C	09/01/84C
Dresden 2	06/25/81C	06/25/81C
Dresden 3	06/26/81C	06/25/81C
Duane Arnold	06/21/82C	01/01/82C
Farley 1	03/01/82C	03/01/82C
FitzPatrick	08/28/84C	08/31/84C
Fort Calhoun	10/14/80C	07/31/81C
Ginna	10/27/87C	10/31/87C
Haddam Neck	04/26/90C	06/26/90C
Hatch 1	05/25/89C	05/25/89C
Hatch 2	06/01/85C	07/01/85C
Indian Point 2	12/26/84C	12/01/84C
Indian Point 3	05/31/85C	05/28/85C
Kewaunee	07/05/85C	09/03/85C
Maine Yankee	01/21/81C	/ / C
Millstone 1	05/23/84C	05/23/84C
Millstone 2	11/19/80C	11/19/80C
Monticello	01/23/84C	01/01/84C
Nine Mile Point 1	02/02/84C	02/02/84C
North Anna 1	12/10/80C	12/01/80C
Oconee 1	12/10/80C	/ / C
Oconee 2	12/10/80C	/ / C
Oconee 3	12/10/80C	/ / C
Oyster Creek	10/29/82C	11/01/82C
Palisades	05/03/89C	05/07/90C
Peach Bottom 2	07/15/80C	01/01/80C
Peach Bottom 3	07/15/80C	01/01/80C
Pilgrim 1	10/28/82C	01/01/82C
Point Beach 1	06/25/81C	06/01/81C
Point Beach 2	06/25/81C	06/01/81C
Prairie Island 1	10/27/89C	02/09/90C
Prairie Island 2	10/27/89C	02/09/90C
Quad Cities 1	06/26/81C	01/01/81C

ATTACHMENT 1

<u>Plant</u>	<u>Licensing Action Complete</u>	<u>Implementation Complete</u>
Quad Cities 2	06/26/81C	01/01/81C
Rancho Seco	03/04/85C	04/01/85C
Robinson 2	03/18/82C	03/01/82C
Saint Lucie 1	05/28/81C	01/01/81C
Salem 1	11/28/80C	11/30/80C
San Onofre 1	06/11/81C	06/11/81C
Surry 1	02/28/81C	02/09/81C
Surry 2	02/06/81C	02/09/81C
Three Mile Island 1	08/07/84C	08/31/84C
Trojan	12/11/80C	02/10/81C
Turkey Point 3	05/12/81C	01/01/81C
Turkey Point 4	05/12/81C	01/01/81C
Vermont Yankee 1	12/31/80C	12/18/80C
Yankee-Rowe 1	02/26/81C	02/01/81C
Zion 1	06/22/81C	06/30/81C
Zion 2	06/22/81C	06/30/81C

ATTACHMENT 2

Plants For Which Necessary Actions Were Completed With Issuance Of
Operating License

<u>Plant</u>	<u>Licensing Action Complete</u>	<u>Implementation Complete</u>
Beaver Valley 2	08/14/87C	08/14/87C
Braidwood 1	07/02/87C	07/02/87C
Braidwood 2	05/20/87C	05/20/87C
Byron 1	02/14/85C	02/14/85C
Byron 2	01/30/87C	01/30/87C
Calloway 1	10/18/84C	10/18/84C
Catawba 1	01/17/85C	01/17/85C
Catawba 2	05/15/86C	05/15/86C
Clinton 1	04/17/87C	04/17/87C
Diablo Canyon 1	11/02/84C	11/02/84C
Diablo Canyon 2	08/26/85C	08/26/85C
Farley 2	03/11/85C	03/11/85C
Fermi 2	07/15/85C	07/15/85C
Grand Gulf 1	08/31/84C	08/31/84C
Harris 1	01/12/87C	01/12/87C
Hope Creek	07/25/86C	07/25/86C
La Salle 1	08/13/82C	08/13/82C
La Salle 2	03/23/84C	03/23/84C
Limerick 1	08/08/85C	08/08/85C
Limerick 2	08/29/89C	08/29/89C
McGuire 1	07/08/81C	07/08/81C
McGuire 2	05/27/83C	05/27/83C
Millstone 3	01/31/86C	01/31/86C
Nine Mile Point 2	07/02/87C	07/02/87C
North Anna 2	08/21/80C	08/21/80C
Palo Verde 1	06/01/85C	06/01/85C
Palo Verde 2	04/24/86C	04/24/86C
Palo Verde 3	11/25/87C	11/25/87C
Perry 1	11/03/86C	11/03/86C
River Bend	11/20/85C	11/20/85C
Saint Lucie 2	06/10/83C	06/10/83C
Salem 2	05/20/81C	05/20/81C
San Onofre 2	09/07/82C	09/07/82C
San Onofre 3	09/16/83C	09/16/83C
Seabrook	05/25/89C	05/25/89C
Sequoyah 1	09/17/80C	09/17/80C
Sequoyah 2	09/15/81C	09/15/81C
Shoreham	04/21/89C	04/21/89C
South Texas 1	05/20/88C	05/20/88C
South Texas 2	03/28/89C	03/28/89C
Summer 1	11/12/82C	11/12/82C
Susquehanna 1	11/12/82C	11/12/82C
Susquehanna 2	06/27/84C	06/27/84C
Vogtle 1	03/16/87C	03/16/87C
Vogtle 2	03/30/89C	03/30/89C
Waterford 3	03/16/85C	03/16/85C
WNP-2	04/13/84C	04/13/84C
Wolf Creek 1	06/04/85C	06/04/85C

SAFETY ISSUES MANAGEMENT SYSTEM
SAFETY ISSUE LEVEL INFORMATION

ISSUE NUMBER: GL 80-030

TITLE: CLARIFICATION OF THE TERM "OPERABLE" AS IT APPLIES TO SINGLE FAILURE

CONTACT: D. BRINKMAN

TYPE: GENERIC LETTER

IDENTIFYING ORGANIZATION: NRR

STATUS: 3A

SPONSORING OFFICE: NRR

PRIORITY: 2

TYPE OF REACTORS AFFECTED: OTH

OTHER: GL'S-4/10/80 E/HBAY

DEPENDENT ISSUES:

DESCRIPTION

~~NO DESCRIPTION TEXT FOR ISSUE 800~~

The NRC issued GL 80-30 on 4/10/80. The purpose of that GL was to (1) clarify the meaning of the term Operable as it applies to the single failure criterion for safety systems in power reactors and (2) ensure that licenses have technical specifications (TS) which require plant operators to take specific actions to assure that maintenance activities do not defeat required safety features. MPA D017 was assigned to track the implementation of the required TS changes.

The attached SIMS listing of TAC numbers covers only those operating LWRs which did have Ols when GL 80-030 was issued on 4/10/80 plus six plants (Watts Bar 1 & 2, Bellefonte 1 & 2, and Comanche Peak 1 & 2) for which TACs were opened in accordance with the instructions in J. Partlow's 11/1/89 memo of instructions regarding MPMs. For Ols issued after 4/10/80, the staff practice was to not open TACs since the TS for those plants conformed with the requirements of MPA D017 because their plant-specific TS were based on the NRC's Standard TS which contained the requirements of MPA D017 and GL 80-030. An audit of the TS for Ols issued after 4/10/80 verified conformance with the requirements of MPA D017 and GL 80-030.

Ft. St. Vrain is not included in the attached SIMS list since it has been permanently shutdown.

The closeout memo for this MPA (memo for T. Murley, from J. Partlow and W. Russell) contains two attachments which together list all applicable LWR plants. Attachment 1 of that memo lists all plants for which TACs were opened. Attachment 2 of that memo lists all plants for which the required actions were completed with issuance of the OL. Both attachments also show the licensing Action Complete and Implementation Complete dates.

Onsite verification of conformance to MPA D017 is not required since changes were required only to plant TS and to associated plant procedures as necessary to assure conformance with the revised TS.

SOLUTION (NEAR AND LONG TERM)

~~THE ATTACHED SIMS LISTING OF TAC NUMBERS COVERS ONLY THOSE OPERATING LIGHT WATER COOLED POWER PLANTS WHICH DID NOT HAVE FULL POWER LICENSES WHEN THE APPLICABLE GENERIC LETTER (GL) WAS ISSUED ON 4/10/80. THE STAFF PRACTICE WAS TO NOT OPEN TACS FOR UNLICENSED PLANTS FOR A PLANT WITH AN OPERATING LICENSE ISSUED AFTER 4/10/80, THE TECHNICAL SPECIFICATIONS (TS) SHOULD CONFORM TO MPAD-17. THAT IS BECAUSE ITS TS SHOULD HAVE BEEN BASED ON NRC'S STANDARD TECHNICAL SPECIFICATIONS (STS) AND THOSE STS CONSTITUTE CURRENT STAFF GUIDANCE IN THE AREAS COVERED BY THE GL OF 4/10/80. AN AUDIT VERIFIED CONFORMANCE FOR PLANTS LICENSED AFTER 4/10/80. FOR THE FORT SAINT VRAIN (FSV) AS COOLED POWER PLANT LICENSED IN 1979, THE OPERATION DOES CONFORM TO MPA D-17 GUIDANCE. ADDITIONALLY, THE LICENSEE SUBMITTED TS CHANGE PROPOSALS THAT WOULD REQUIRE CONTINUATION OF SUCH CONFORMANCE. THOSE TS CHANGE PROPOSALS WERE SUBMITTED AS PART OF A LARGE TS UPDATE PROPOSAL. HOWEVER, FSV WILL BE DEFUELED AND SHUTDOWN PERMANENTLY IN 1990. FOR THIS REASON, THE FSV PM WILL ACT ONLY ON THOSE TS CHANGE PROPOSALS WHICH WILL BE NEEDED FOR OPERATIONS BEYOND 1990. FOR THIS REASON, FSV DOES NOT APPEAR ON THE LIST FOR MPA D-17. ON-SITE VERIFICATION OF CONFORMANCE TO MPA D-17 IS NOT REQUIRED. ONLY CHANGES REQUIRED WERE TO PLANT TS AND TO ASSOCIATED PLANT PROCEDURES AS NECESSARY TO ASSURE COMPLIANCE WITH THE REVISED TS.~~