



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 7, 1994

Mr. Lee Bush, Chairman
Westinghouse
Technical Specifications Committee
% Zion Nuclear Power Station
101 Shiloh Boulevard
Zion, Illinois 60099

Mr. Brian Woods, Chairman
Combustion Engineering
Technical Specifications Committee
% Southern California Edison
9975 Toledo Way
Irvine, California 92718

Mr. Blair Wunderly, Chairman
Babcock & Wilcox
Technical Specifications Committee
% Crystal River Unit 3
Power Line Road
P. O. Box 219 NA2I
Crystal River, Florida 32629

Mr. Ray Baker
BWR Technical Specifications Committee
% Southern Nuclear Operating Company
P.O. Box 1295
Birmingham, AL 35201

Gentlemen:

Enclosed are the results of the staff's review of the following packages of changes the Owners Group proposed for the standard technical specifications:

- BWR-15 C.1 to C.22
- BWR-16 C.1 to C.30
- BWR-19 C.1 to C.12
- CEOG-03 C.1 to C.4
- BWOG-09 C.1 to C.26

You will note that the enclosed listings identify questions and difficulties with the proposed changes. I suggest that we arrange meetings to discuss and resolve these questions. The meetings should be arranged with appropriate NRC and OG technical experts to clarify the purpose and result of the proposed changes, or alternate changes. We request that the Owners Groups propose a schedule by which such meetings could be conducted at the NRC's offices in Rockville. We will coordinate the proposed schedule with the technical staff, and confirm the meeting times and locations. Should you have any question regarding this matter, please contact me.

Sincerely,

CI Grimes
Christopher I. Grimes, Chief
Technical Specifications Branch
Division of Operating Reactor Support

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PDR ADOCK 05000295
P PDR

Enclosures:
As stated

cc: W. Hall, NUMARC
D. Hoffman, EXCEL

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RETURN TO REGULATORY CENTRAL FILES

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Original Signed by:

C. I. Grimes

Christopher I. Grimes, Chief
Technical Specifications Branch
Division of Operating Reactor Support

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As stated

cc: W. Hall, NUMARC
D. Hoffman, EXCEL

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<<BWR-15>> STS Evaluation Comments

COMMENT	PROPOSED CHANGE		CODE	DISCUSSION
	SECTION	TYPE		
C.1	LCO	L	r	The comment involves replacing acceptable examples of containment isolation with the term isolation devices. The staff believes that "isolation devices" is too broad a term for this particular application.
C.2	LCO	A	a	The comment involves improving the quality of the present wording.
C.3	LCO	A	a	The comment involves adding "in MODES 1, 2, and 3" in order to define the proper acceptance criteria.
C.4	Bases	AM	r	The comment proposes several changes that result in the TS being less restrictive.
C.5	Bases	AM	r	The comment involves mostly editorial changes except for the changes such as substituting specifically described isolation devices with the generic term isolation device. Making these substitutions would result in the TS being less restrictive.
C.6	Bases	AM	o	The comment requires better justification.
C.7	Bases	A	a	The comment improves the explanation of the TS.
C.8	Bases	AM	a	The comment adds the closing of the equipment hatches to the requirements for maintaining containment integrity.
C.9	Bases	A	a	The comment involves editorial changes that provide a clearer discussion of the Bases.
C.10	Bases	A	r	The comment suggests omitting separately referencing the purge valves in the PCIV Bases. The staff believes the purge valves should be referenced separately because they are the largest of the PCIVs.
C.11	Bases	A	r	The comment proposes to remove the detailed discussion of MSIV stroke times. The staff believes that the MSIV stroke time details should remain because the stroke time of these valves has an impact on the accident dose to the environment.

TYPES: A = Administrative
 AM = Major Administrative
 M = More Restrictive - Technical
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COMMENT	PROPOSED CHANGE		CODE	DISCUSSION
	SECTION	TYPE		
C.12	Bases	A	r	The comment involves details in the DBA analysis assumptions considered inappropriate and unnecessary. The staff believes this is necessary background information.
C.13	Bases	A	r	The comment involves details about the purge valves considered unnecessary. The staff believes the purge valve details should remain in the Bases since these valves are the largest of the PCIVs.
C.14	Bases	L	r	The comment would result in a relaxation of the requirements of the TS.
C.15	Bases	A	a	The comment adds Type B testing to a reference to LCO 3.6.1.1 because that LCO should include both Type B and Type C tests.
C.16	Bases	A	a	Editorial Comment
C.17	Bases	A	r	The comment proposes to eliminate the system walkdown as an example of verifying that containment penetrations which are not automatically isolated during an accident are left in the closed position. This comment interprets the wording in the Bases to imply a system walkdown is the only acceptable means of verifying containment penetration integrity. The staff believes that this is a universally acceptable means of verifying penetration integrity.
C.18	Bases	A	a	The comment removes two references that are unnecessary.
C.19	Bases	A	r	The comment appears to add unnecessary wording.
C.20	Bases	A	r	The comment is an editorial modification of no significance.
C.21	Bases	A	a	The comment completes the discussion and is consistent with other Bases.
C.22	Bases	A	r	The comment is an editorial modification that does not improve the present wording.

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<<BWR-16>> STS Evaluation Comments

COMMENT	LOCATION	DISCUSSION
C.1	BWR/6 3.6-10 3.6-15 B3.6-24	Acceptable
C.2	BWR/4 3.6-11 B3.6-22 BWR/6 3.6-12 B3.6-21	Acceptable
C.3	BWR/4 3.6-15 3.6-16 B3.6-26 B3.6-28 BWR/6 3.6-16 B3.6-25 B3.6-27	Rejected - The staff believes that the MSIV stroke time details and SR should remain since the stroke time of these valves has an impact on the accident dose to the environment. Proposed change has potential PWR applicability.
C.4	BWR/4 3.6-16 B3.6-28	Rejected - The justification is based on the review of only one plant's T.S. Therefore, this is considered a plant-specific change which should be submitted with the licensee's amendment request. In addition, specifying maximum leakage rate through these valves is consistent with the operational leakage LCO for RCS, since these are part of the RCS boundary.
C.5	BWR/4 3.6-17 BWR/6 3.6-17 B3.6-28	Rejected - Based on the Bases discussion and the frequency specified in the SR's, these SRs are to be performed during shutdown (MODES 4 and 5) not in MODES 1, 2, or 3.
C.6	BWR/4 3.6-19 B3.6-33	Rejected - Just because the lead plant has an exception does not mean it is generic. It would be plant-specific and should be submitted with the licensee's amendment. More justification is needed to show that this is a problem generically.
C.7	BWR/4 3.6-22 B3.6-40 BWR/6 3.6-22 B3.6-39	Rejected - The staff agrees that the flow requirement is necessary to perform the surveillance. However, minimum requirements need to be specified in the TS. Therefore, pressure value and location of pressure indication should not be deleted from the STS.

COMMENT	LOCATION	DISCUSSION
C.8	BWR/4 3.6-26 B3.6-52	Rejected - The second frequency and * note are relaxations to the Required Actions. They allow additional time to elapse to verify system operability for specific conditions prior to entering the RA. The proposed change would remove this relaxation. The staff believes this allows operational flexibility.
C.9	BWR/4 3.6-27	Open
C.10	BWR/6 3.6-39 3.6-40 B3.6-80 B3.6-81 B3.6-82 B3.6-83	Acceptable
C.11	BWR/6 3.6-39 B3.6-81 B3.6-82	Acceptable
C.12	BWR/6 3.6-40 3.6-41	Acceptable
C.13	BWR/6 3.6-41	Acceptable
C.14	BWR/6 3.6-41 B3.6-84	Acceptable
C.15	BWR/4 3.6-47 BWR/6 3.6-45	Rejected - The intent is that "sealed" means locked. Suggest changing "sealed" to locked.
C.16	BWR/6 3.6-55 3.6-60 3.6-66 B3.6-114	Open - Seems acceptable, however missing insert for LCO 3.6.5.3 and Bases changes for LCO 3.6.5.3 and LCO 3.6.5.6.
C.17	BWR/6 LCO 3.6.5.3 pages and associated Bases pages.	Acceptable

COMMENT	LOCATION	DISCUSSION
C.18	BWR/6 3.6-60 3.6-61	Rejected - This same argument would also apply to certain RAs in Primary Containment, PCIVs and possible to the PWRs as well, necessitating changes to more than just this LCO. Inoperability can be more than just leakage and having different times for different valve sizes takes into account design characteristics of the valves. Also, Bases changes not provided.
C.19	BWR/6 3.6-66 3.6-67	Partial Acceptance - Agree with the additions for conditions B, C, D, and E. The staff does not agree to the change for Condition G. The intent of "G" is to start an immediate shutdown upon loss of function no matter what caused the loss of function (open valve or system inoperability). Do we have an additional problem in this LCO? The LCO seems to cover all possible conditions except 1 post LOCA and 1 drywell purge vacuum relief subsystems inoperable. Do we have a LCO 3.0.3 situation? Also, Bases changes not provided.
C.20	BWR/4 B3.6-7 BWR/6 B3.6-6	Rejected - This is a generic change applicable to all OG. Generic change has already been made to correct problem--WOG 11 comment C.1 changed SR reference to SR 3.6.1.2.1 which corrects problem.
C.21	BWR/6 B3.6-7	Rejected - The intent is specific; the only time containment can be breached for inoperable airlock doors is if the inoperable door is the inner door. The staff cannot visualize a condition in which the outer airlock door becomes inoperable such that access through the inner door to make repairs must be made.
C.22	BWR/6 B3.6-7	Open -This is applicable to BWR/4 as well as the PWR's. It is also applicable to LCO 3.6.5.3.

COMMENT	LOCATION	DISCUSSION										
C.23	BWR/4 B3.6-18 B3.6-20 B3.6-43 B3.6-48 B3.6-65 BWR/6 B3.6-7 B3.6-8 B3.6-16 B3.6-17 B3.6-18 B3.6-25 B3.6-42 B3.6-61 B3.6-72 B3.6-83 B3.6-84	<p>Partial Acceptance - All changes are acceptable except for the following:</p> <ol style="list-style-type: none"> 1. BWR/4 pg. B3.6-18 and BWR/6 pg. B3.6-17: The change to delete "are" and substitute "to be" does not make sense, either "are" should be left in or just "be" substituted in for "are." 2. The following C.23 changes in the BWR/6 package are mislabeled: <table border="0"> <thead> <tr> <th style="text-align: center;"><u>Page</u></th> <th style="text-align: center;"><u>Corrected Comment No.</u></th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">B3.6-18</td> <td style="text-align: center;">C.1</td> </tr> <tr> <td style="text-align: center;">B3.6-25</td> <td style="text-align: center;">C.1</td> </tr> <tr> <td style="text-align: center;">B3.6-83</td> <td style="text-align: center;">C.12</td> </tr> <tr> <td style="text-align: center;">B3.6-84</td> <td style="text-align: center;">C.13</td> </tr> </tbody> </table>	<u>Page</u>	<u>Corrected Comment No.</u>	B3.6-18	C.1	B3.6-25	C.1	B3.6-83	C.12	B3.6-84	C.13
<u>Page</u>	<u>Corrected Comment No.</u>											
B3.6-18	C.1											
B3.6-25	C.1											
B3.6-83	C.12											
B3.6-84	C.13											
C.24	BWR/4 B3.6-9 BWR/6 B3.6-8 B3.6-115	Open - This is also applicable to the PWRs.										
C.25	BWR/4 B3.6-25 BWR/6 B3.6-24	Rejected - Wording in the BWR/6 Bases is similar to PWR wording. Thus, no change required. Suggest changing BWR/4 wording to be consistent with other OG's and BWR/6 (i.e., spell out PCIV).										
C.26	BWR/4 B3.6-35 B3.6-58 BWR/6 B3.6-54 B3.6-80	Rejected - The staff does deem the deleted wording as excessive, rather it provides essential information used to develop the specifications.										
C.27	BWR/6 B3.6-74	Acceptable										
C.28	BWR/4 B3.6-101 BWR/6 B3.6-94	Acceptable										
C.29	BWR/6 B3.6-115	Acceptable										
C.30	BWR/6 B3.6-115 B3.6-116	Accept change in principle. However, the staff recommends that the Bases wording be made consistent with the primary containment airlock Bases.										
--	BWR/4 B3.6-30	The change on this page has no comment number.										

<<BWR-19>> STS Evaluation Comments

COMMENT	PROPOSED CHANGE		CODE	DISCUSSION
	SECTION	TYPE		
C.1	LCO	A	a	The title for LCO 3.3.2.2 was changed to Feedwater and Main Turbine High Water Level Trip Instrumentation in order to improve the accuracy of the title.
C.2	Bases	A	a	Editorial Corrections.
C.3	Bases	A	a	Editorial Corrections.
C.4	Bases	A	a	Based on the BWR-4 Lead Plant TS, this comment adds the phrase "during reactor startup" in order to present a clearer presentation of the intended requirements.
C.5	LCO	A	a	This comment identifies the inoperable subsystem described in the LCO as a "required" subsystem.
C.6	Bases	A	a	Explicit discussions concerning SDM assumptions in the fuel assembly insertion event were bracketed, since these may not be applicable to all BWRs.
C.7	Bases	A	a	This comment provides a more concise justification for the 24-hour Completion Time allowed for restoring one inoperable RBM channel to operable status.
C.8	Bases	L	a	This comment restricts the performance of CHANNEL FUNCTIONAL TEST for portions of the SRV discharge tailpipe pressure switch inside containment to "scheduled outages" greater than 72 hours. This allowance is provided to properly plan and execute the test without undue impact on plant operation and is consistent with the approved license for the BWR-4 Lead Plant.
C.9	Bases	AM	o	This comment states that the Completion Times and their associated Required Actions do not involve the activity of placing the MCREC subsystem into operation. If the MCREC subsystem is not placed into operation during this time, the TS should provide the time and method for placing it into operation.
C.10	Bases	A	a	This comment identifies a statement about the ADS valves, contained in the SRV Bases, which is inappropriate for the SRVs.

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COMMENT	PROPOSED CHANGE		CODE	DISCUSSION
	SECTION	TYPE		
C.11	Bases	A	a	This comment revises the wording in order to be consistent with the comparable section of the BWR-6 STS.
C.12	Bases	A	a	This comment clarifies the intent and implementation of a NOTE in SR 3.5.1.6 and is consistent with the Lead Plant conversion.

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<<CEOG-03>> STS Evaluation Comments

COMMENT	PROPOSED CHANGE		CODE	DISCUSSION
	SECTION	TYPE		
C.1	4.1	AM	o	While the approach appears reasonable, the STS should include a "typical" description, to describe the type of information that should be included to clearly explain the Site Location.
C.2	4.2.1	L	r	GL 90-02, Supplement 1 requires staff approval of the methods that will be used for limited substitutions of filler rods. This provision is consistent with Criterion 1 of the Policy Statement.
C.3	4.2.2	L	r	GL 90-02, Supplement 1 and GDC-10 require that the reactor core be designed in accordance with specified fuel design limits (SAFDL).
C.4	4.3.2	L	r	Fuel pool drainage must be retained, in accordance with the Split Report, to identify the safety limit which prevents inadvertant draining of the spent fuel pool.

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<<BWOG-09>> STS Evaluation Comments

NOTE: The justifications for all 26 proposed changes to the Administrative Controls appear reasonable, sufficient, and consistent with the staff's request dated October 25, 1993, except as follows:

COMMENT	LOCATION	DISCUSSION
None	5.6.1	The OG markups deleted the bracketed paragraph "b. Any other unit unique reports ..." The CE Lead Plant application retains an annual Specific Activity report under this provision. Thus, it would appear prudent to leave this optional reporting provision for other licensees that may not want to try to justify relocating special reporting requirements.
None	5.6.9	The BWROG markup of the Reporting Requirements section for NUREG-1433 does not include an optional Tendon Surveillance report. This option is included in all of the other STS.
None	5.5.2 5.5.6 5.5.11 5.5.13	The proposed changes to the Administrative Controls do not address the question raised in the staff's 10/25/93 letter concerning the use of such controls for surveillance requirements, that would be more appropriately included in the LCOs. The OG described their response at the December 1993 meeting as follows: <i>Relocating these surveillance requirements out of the administrative controls sections and restoring them to the applicable surveillance requirements would result in cumbersome presentation of the requirements.</i>
C.17	5.7.2.12	Although 10 CFR 50.55a may eventually be revised to fully incorporate the necessary provisions of the ASME Code, the flywheel inspection and IST testing frequencies are not adequately covered and must, therefore, be retained in the TS.
C.25	5.11	The justification does not adequately explain how the staff's approval of alternate techniques for the control of high radiation areas, under 10 CFR 20, §302(c)(5) or §1601(c), will be relocated, maintained, and enforced.