



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

August 23, 1990

*ASST. DIR.*

MEMORANDUM FOR: Edward L. Jordan, Director  
Committee to Review Generic Requirements

FROM: Frank J. Miraglia, Deputy Director  
Office of Nuclear Reactor Regulation

SUBJECT: WAIVER OF CRGR REVIEW OF PROPOSED GENERIC LETTER ON THE  
REMOVAL OF RESPONSE TIME LIMITS FROM TECHNICAL SPECIFICATIONS

*Courin, ALLISON*  
*This is a case in which I'm not sure I agree with deletion. Response time is important and to keep the value out front.*  
*EP*

We have issued Technical Specifications (TS) for some operating licenses without the tables containing instrument response time limits for the Reactor Trip System (RTS) and the Engineered Safety Features Actuation System (ESFAS). However, the TS retain the surveillance requirements to verify that the response times of RTS and ESFAS instrumentation are within their limits.

For these plants, the licensees included the tables on response times in the Updated Safety Analysis Reports (USARs). Hence, any change to correct or update these limits in the USAR is subject to the provisions of 10 CFR 50.59. This regulation provides a means to control changes to these limits without the necessity of a license amendment as is required when they are included in TS.

The staff is proposing to issue a Generic Letter (Enclosure 1) to provide guidance on a license amendment request to remove the tables on RTS and ESFAS response time limits from plant TS. This change is being proposed as a line-item TS improvement. Enclosure 2 is a draft memorandum to Project Managers with a model Safety Evaluation Report (SER) for this TS change.

Because the proposed action involves a TS change for multiple plants, it is subject to CRGR approval. However, we recommend that the CRGR waive review of this action for the following reasons:

1. The changes described in the proposed Generic Letter do not alter TS requirements to verify the response times of safety system instrumentation.
2. The regulations provide adequate controls for changing these limits when they are placed in the USAR.
3. These actions are consistent with current practice and do not represent a new staff position. Also, this change is consistent with the proposals for the new STS that the industry developed in response to the Commission Policy Statement on TS Improvements.
4. Any licensee proposal to implement this TS change is voluntary.

Contact: T. Dunning, OTSB/DOEA  
49-21189

9009110165  
*TD*

A response to our recommendation for waiving CRGR review is requested at your earliest convenience. If you find that CRGR review of this action is necessary, we will prepare a package for CRGR review. This action is sponsored by Charles E. Rossi, Director, Division of Operational Events Assessment.

*W. Russell for*

Frank J. Miraglia, Deputy Director  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated



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

Enclosure 1

TO ALL HOLDERS OF OPERATING LICENSES OR CONSTRUCTION PERMITS FOR NUCLEAR  
POWER REACTORS

SUBJECT: REMOVAL OF TECHNICAL SPECIFICATION TABLES CONTAINING RESPONSE  
TIME LIMITS FOR THE REACTOR TRIP SYSTEM AND ENGINEERED SAFETY  
FEATURES ACTUATION SYSTEM (Generic Letter 90- )

This Generic Letter provides guidance for a license amendment request to remove the tables containing response time limits for Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) instrumentation from Technical Specifications (TS). This TS change is a line-item improvement that has been implemented in TS for recent operating licenses.

The removal of the TS tables on response time limits does not alter the surveillance requirements to verify that the response time of each RTS and ESFAS function is within its limit nor the requirement that these limits be met. However, the removal of these tables does permit administrative control of changes to the response time limits without requiring a license amendment.

With this proposed TS change, licensees should provide a commitment to include the table on response time limits in the next revision of the Updated Safety Analysis Report (USAR). Licensees may then make changes to response time limits in accordance with 10 CFR 50.59 upon determination that an unreviewed safety question does not exist. 10 CFR 50.59 provides an acceptable means by which changes to these limits may be made without prior NRC approval when they are included in the USAR.

The NRC encourages licensees and applicants to propose changes to their plant TS that are consistent with the guidance provided in the enclosure. Proposed license amendments conforming to this guidance will be expeditiously reviewed by the NRC Project Manager for the facility. Proposed license amendments that deviate from this guidance will require a longer, more detailed review. Please contact the NRC Project Manager if you have any questions on this matter.

Sincerely,

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

Enclosure:  
As stated

GUIDANCE FOR A PROPOSED LICENSE AMENDMENT REQUEST TO  
REMOVE TABLES FOR RESPONSE TIME LIMITS FROM TECHNICAL SPECIFICATIONS

INTRODUCTION

The U.S. Nuclear Regulatory Commission (NRC) is providing the following guidance for the preparation of a proposed license amendment to request the removal of the tables of response time limits for the Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) from Technical Specifications (TS). This TS change is a line-item improvement that has been implemented for recent operating licenses.

DISCUSSION

The Limiting Conditions for Operation (LCOs) for RTS and ESFAS instrumentation require that these systems be operable with response times as specified in TS tables for each of these systems. In addition, the surveillance requirements specify the testing requirements for verifying that each of these systems have response times that are within limits. The removal of the tables for the RTS and ESFAS response time limits from the TS does not alter these requirements. However, this TS change does allow administrative control of changes of the RTS and ESFAS response time limits without the necessity of a license amendment.

Licensees and applicants that wish to implement this line-item TS improvement should provide a commitment to include the tables of RTS and ESFAS response time limits in the next revision of the Updated Safety Analysis Report (USAR). Therefore, licensees may make subsequent changes to the response time limits in accordance with the requirements of 10 CFR 50.59 without NRC approval if an unreviewed safety question does not exist. The inclusion of these limits in the USAR assures that adequate measures exist to control changes.

Typically, the LCOs for the RTS and ESFAS instrumentation note that the associated instrumentation ". . . shall be OPERABLE with RESPONSE TIMES as shown in Table 3.3-2" or "Table 3.3-5." An acceptable change to the LCOs would simply state that this instrumentation ". . . shall be OPERABLE." This change will permit the removal of the referenced tables. The surveillance requirements properly state that the response times of trip functions are to be demonstrated to be within the limits. Therefore, the surveillance requirements will not require any modification to implement this change.

SUMMARY

The relocation of tables of RTS and ESFAS response time limits from TS to the USAR will permit administrative control of these limits without the need for a license amendment and with suitable procedures provided by 10 CFR 50.59 to control changes. This line-item TS improvement will eliminate an unnecessary expenditure of NRC and licensee resources when changes to these limits are required.



UNITED STATES  
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WASHINGTON, D. C. 20555

Enclosure 2

MEMORANDUM FOR: All NRR Project Managers

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

SUBJECT: GENERIC LETTER 90-

Enclosure 1 is Generic Letter 90- , which provides guidance to licensees for a license amendment request to remove tables of instrumentation response time limits from Technical Specifications (TS). Any proposal for this line-item TS improvement is voluntary.

Project Managers should review and process proposed license amendments conforming to the guidance of the generic letter. Generally, review assistance from a technical review branch should not be required to process the amendment unless the proposed TS change deviates from the generic letter guidance.

Enclosure 2 is a model Safety Evaluation Report (SER) that was prepared by the Technical Specifications Branch. This model SER should facilitate your preparation of a license amendment to implement the line-item TS improvements addressed in the generic letter. The Lead Project Manager for this task is \_\_\_\_\_ . \_\_\_\_\_ will assist you in the preparation of a no significant-hazards consideration (NSHC) pre-notice for a proposed amendment conforming to the generic letter and should be included on distribution for the amendment package.

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

Enclosures:

1. Generic Letter 90-
2. Model SER

cc w/enclosures:

J. Sniezek  
H. Thompson  
Division Directors, NRR  
Associate Directors, NRR  
Project Directors, NRR  
Regional Administrators  
J. Conran, CRGR  
C. Berlinger, DOE  
S. Treby, OGC

CONTACT:

T. Dunning, OTSB, NRR  
492-1189

## MODEL SAFETY EVALUATION REPORT

Underscored blank spaces are to be filled in with the applicable information. The information identified in brackets should be used as applicable on a plant-specific basis.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. \_\_\_ TO FACILITY OPERATING LICENSE NFP-\_\_\_  
AND AMENDMENT NO. \_\_\_ TO FACILITY OPERATING LICENSE NFP-\_\_\_  
[UTILITY NAME]  
DOCKET NOS. 50-\_\_\_ AND 50-\_\_\_  
[PLANT NAME], UNITS 1 AND 2

### INTRODUCTION

By letter of \_\_\_\_\_, 1990, [utility name] (the licensee) proposed a change to the Technical Specifications (TS) for [plant name]. The proposed change removes Technical Specifications (TS) Tables [3.3.-2 and 3.3-5] that provide response time limits for Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) instrumentation. These tables will be included in the next revision of the [plant name] Updated Safety Analysis Report (USAR). Guidance on the proposed TS changes was provided by Generic Letter 90-\_\_\_, of \_\_\_\_\_, 1990 to all holders of operating licenses or construction permits for nuclear power reactors.

### EVALUATION

Tables 3.3-2 and 3.3-5 contain values of overall system response time limits for the RTS and ESFAS instrumentation. The Limiting Conditions for Operation (LCO) for RTS and ESFAS instrumentation specify that these systems shall be operable with response times as specified in these tables. Also, these time limits are the acceptance criteria for performing tests of the response of RTS and ESFAS instrumentation in accordance with the surveillance requirements of Specifications 4.3.1.2 and 4.3.2.2, respectively. These requirements ensure that the response times of the RTS and ESFAS instrumentation are consistent with the assumptions of the safety analysis report for the mitigation of design basis accidents and transients.

Because the RTS and ESFAS response time limits are included in the TS, the licensee can make changes to update or correct errors in these limits only through the license amendment process. To eliminate the resource burden involved with changes to these limits, the NRC has issued TS for recent operating licenses without including the tables of RTS and ESFAS response time limits. However, the associated surveillance requirements include tests to ensure that the RTS and ESFAS response time limits are met and the surveillance requirements have been retained in the TS. Therefore, the requirements for response time surveillances remain unchanged, and this change affects only the control of changes to the limits. As noted in the guidance for this line-item TS improvement, the staff concluded that by placing the tables of RTS and ESFAS response time limits in the USAR, licensees may make subsequent changes to these limits in accordance to the requirements of 10 CFR 50.59 without NRC approval if an unreviewed safety question does not exist.

The licensee has proposed changes to Specification 3.3.1 and 3.3.2 that are consistent with the guidance provided in Generic Letter 90- for the removal of Tables [3.3-2 and 3.3-5] from the TS. In addition, the licensee has provided a commitment to include the tables with these limits in the next revision of the USAR. On the basis of its review of this matter, the staff finds that the proposed changes to the TS for (plant name) Unit(s) \_\_\_ are acceptable.

#### ENVIRONMENTAL CONSIDERATION

These amendments involve a change in a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is not significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### CONCLUSION

The Commission made a proposed determination that the amendment(s) involves no significant-hazards consideration, which was published in the Federal Register (5 FR \_\_\_ ) on \_\_\_\_\_, 199\_. The Commission consulted with the State of \_\_\_\_\_. No public comments were received, and the State of \_\_\_\_\_ did not have any comments.

On the basis of the considerations discussed herein, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Thomas G. Dunning, OTSB/DOEA  
\_\_\_\_\_, PD \_\_\_/DRP \_\_\_

Dated: \_\_\_\_\_, 199\_

(NOTE TO PMs: A copy of this model SER may be obtained from P. Coates, X-21161 by requesting 5520 Document: "RESPONSE TIME MODEL SER")



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

January 14, 1991

MEMORANDUM FOR: James M. Taylor  
Executive Director for Operations

FROM: Edward L. Jordan, Chairman  
Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NO. 196

The Committee to Review Generic Requirements (CRGR) met on Wednesday, December 12, 1990 from 1:00-5:00 p.m. A list of attendees at the meeting is enclosed (Enclosure 1). The following items were discussed at the meeting:

1. E. Rossi, J. Calvo, M. Reinhart and T. Dunning of NRR provided a briefing on improved standard technical specifications and four requests for waiver of CRGR review regarding specific line item technical specification improvements.

With regard to the improved standard technical specifications, which would be reviewed at a future meeting, the CRGR provided a number of questions and comments for staff consideration.

With regard to the waiver requests, the disposition was as follows:

- (a) Proposal to remove testing requirements for BWR scram accumulator check valves.

This proposal was withdrawn by the staff.

- (b) Proposal to remove lists of acceptable response times with regard to response time testing.

The CRGR requested a full review of this matter and the staff agreed to prepare a review package.

- (c) Proposal to remove the schedule for removal of reactor vessel surveillance specimens.

The CRGR agreed that there was no need for further formal review of this item.

- (d) Proposal to remove lists of components to which certain requirements apply.

The CRGR agreed that there was no need for further formal review of this item.

This matter is discussed in Enclosure 2.

2. J. Greeves, J. Surmeier and M. Tokar of NMSS provided a briefing on a proposed technical position on waste form. The CRGR agreed with the NMSS judgment that formal CRGR review of this item was not needed. This matter is discussed in Enclosure 3.

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In accordance with the EDO's July 18, 1983 directive concerning "Feedback and Closure of CRGR Reviews," a written response is required from the cognizant office to report agreement or disagreement with CRGR recommendations in these minutes. The response, which is required within five working days after receipt of these minutes, is to be forwarded to the CRGR Chairman and if there is disagreement with CRGR recommendations, to the EDO for decisionmaking.

Questions concerning these meeting minutes should be referred to Dennis Allison (492-4148).

Original Signed by:  
E. L. Jordan

Edward L. Jordan, Chairman  
Committee to Review Generic  
Requirements

Enclosures:  
As stated

cc: Commission (5)  
SECY  
J. Lieberman  
P. Norry  
D. Williams  
Regional Administrators  
CRGR Members

Distribution:  
Central File (w/o encl.)  
PDR/DCS (NRC/CRGR) (w/o encl.)  
P. Kadambi CRGR C/F  
CRGR S/F M. Taylor  
J. Sniezek E. Rossi  
J. Calvo E. Sullivan  
G. Thomas R. Bangert  
J. Surmeier D. Ross  
E. Jordan D. Allison  
J. Conran

*DPA*

OFC	CRGR/AEOD	DD:AEOD	C/CRGR/AEOD		
NAME	DAllison:slm	DRoss	EJordan		
DATE	1/11/91	1/14/91	1/14/91		

ATTENDANCE LIST

CRGR Meeting No. 196

December 12, 1990

CRGR Members

E. Jordan  
G. Arlotto  
J. Moore  
F. Miraglia  
B. Sheron  
L. Reyes

CRGR Staff

J. Conran  
D. Allison

NRC Staff

E. Rossi  
M. Reinhart  
J. Calvo  
T. Dunning  
R. Lobel  
J. Tsao  
R. Emch  
J. Surmeier  
M. Reinhart  
J. Greeves  
N. Gill  
M. Tokar  
C. Harbuck

Enclosure 2 to the Minutes of CRGR Meeting No. 196  
Briefing on Improved Standard Technical Specifications  
and Four Request for Waiver of CRGR Review Regarding  
Specific Line Item Technical Specification Improvements

December 12, 1990

TOPIC/CONCLUSIONS

E. Rossi, J. Calvo, M. Reinhart and T. Dunning of NRR provided a briefing on improved standard technical specifications and four requests for waiver of CRGR review regarding specific line item technical specification improvements.

- (1) The improved standard technical specifications were to be issued for comment in the near future. The package would be provided to the CRGR for information at that time. It would consist of about 15,000 pages, including about 4,000 technical specification changes. After subsequent consideration of comments and appropriate revision, the package would be sent to CRGR for review.

It was noted that licensees' adoption of the new standard technical specifications would be voluntary. To the extent licensees did volunteer to adopt the new standards, NRC acceptance would be contingent upon adoption of an upgraded 10 CFR 50.59 review process as described in an industry document, NSAC-125. A one year trial program using this guidance was nearing completion.

It was noted that the CRGR would be interested in a briefing on the NSAC-125 program.

With regard to risk during shutdown modes, it was noted that, for the forthcoming improved standard technical specifications, the staff would have a basis for its decisions as to the modes for which each requirement would apply. However, the search for any new specifications that might be needed to reduce risk in shutdown modes would be completed later.

The specific line item improvements discussed below were related to the improved STS in that they would be included in the improved STS. However, they were really separate actions being taken now and in that sense they would be independent of the improved STS.

(2) Requests for waiver of CRGR review regarding specific line item technical specification improvements:

- (a) Proposal to remove testing requirements for BWR scram accumulator check valves.

The CRGR had some comments and questions about this proposal. However, prior to the meeting the staff had decided to withdraw the request.

- (b) Proposal to remove lists of acceptable response times with regard to response time testing.

The CRGR had a number of comments and questions on this proposal and requested a full CRGR review. Such review could be deferred until CRGR review of the improved STS, at the staff's discretion. The staff agreed to provide a CRGR review package and indicated that it did not intend to wait until review of the STS.

The CRGR requested that the staff address the question of how it makes the finding that there will be no decrease in safety as a result of removing the requirements from the TS and placing them in other documents under the control of the 10 CFR 50.59 in view of weaknesses that have been noted in that review process.

- (c) Proposal to remove the reactor vessel surveillance specimen removal schedule.

The CRGR noted that this item is also covered by rule, under Appendix H to 10 CFR 50. The CRGR agreed that there was no need for further formal review of this matter.

- (d) Proposal to remove lists of components to which certain requirements apply.

The CRGR agreed that there was no need for further formal review of this item.

A copy of the handout materials used by the staff in its presentation is provided as an attachment to this enclosure.

#### BACKGROUND

1. A package of background material related to the improved standard technical specifications was transmitted by a memorandum for E. Jordan from F. Miraglia (undated) sent on December 7, 1990. The enclosures included:
  - Interim policy statement on technical specification improvements, 2/6/87.
  - Letters to owners groups on relocation of requirements, 5/9/88.
  - SECY-88-304 on reducing testing at power, 10/26/88.
  - SECY-90-366 on status of technical specification improvement, 10/29/90.
2. Waiver requests were transmitted as follows:
  - a. Memorandum for E. Jordan from F. Miraglia, dated August 23, 1990 regarding removal of testing requirements for BWR scram accumulator check valves from technical specifications.
  - b. Memorandum for E. Jordan from F. Miraglia, dated August 23, 1990 regarding removal of response time limits from technical specifications.

- c. Memorandum for E. Jordan from F. Miraglia, dated August 14, 1990 regarding removal of schedule for removal of reactor vessel material specimens from technical specifications.
- d. Memorandum for E. Jordan from F. Miraglia, dated November 16, 1990 regarding removal of component lists from technical specifications.

COMMITTEE FOR REVIEW OF GENERIC REQUIREMENTS

NEW STANDARD TECHNICAL SPECIFICATIONS (STS)

MARK REINHART

WEDNESDAY, DECEMBER 12, 1990

ATTACHMENT TO  
ENCLOSURE 2

INFORMATION BRIEFING ON NEW STANDARD TECHNICAL SPECIFICATIONS (STS)

- OVERVIEW OF PROGRAM AND PROGRESS TODAY
- RELEASE FINAL DRAFT FOR YOUR INFORMATION JAN 91



## CHRONOLOGY: STANDARD TECHNICAL SPECIFICATIONS (STS)

### • BACKGROUND

COMMISSION'S INTERIM POLICY STATEMENT	FEB 87
"SPLIT REPORT"	MAY 88
OWNERS GROUPS PROPOSED NEW STS	MAR 89 TO JUN 89
STAFF'S REVIEW AND DISCUSSIONS WITH OWNERS GROUPS	APR 89 TO DEC 90

### • PROGRESS

STAFF TO ISSUE FINAL DRAFT NEW STS AND THEIR BASES	JAN 91
OWNERS GROUPS' AND NRC STAFF'S FINAL REVIEW	

### • FUTURE

APPLY LESSONS LEARNED FROM LEAD PLANT CONVERSIONS TO NEW STS	
ISSUE NEW STS AND THEIR BASES	SPRING 91

## EXTENT OF PARTICIPATION IN PROGRAM

- INDUSTRY PARTICIPATION (30 PERSONS)
  - NUMARC
  - NSSS OWNERS GROUPS
  - LEAD PLANT LICENSEES
  - OTHER LICENSEES
- NRC STAFF PARTICIPATION (65 PERSONS)
  - TECHNICAL SPECIFICATIONS BRANCH
  - NRR TECHNICAL BRANCHES (INCLUDING RISK AND HUMAN FACTORS)  
PROJECTS
  - REGIONS
  - TECHNICAL TRAINING CENTER
- NRC CONTRACTORS (25 PERSONS)
  - LAWRENCE LIVERMORE NATIONAL LABORATORY
  - IDAHO NATIONAL ENGINEERING LABORATORY
  - PACIFIC NORTHWEST LABORATORIES
  - SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

LEAD PLANT CONVERSIONS TO NEW STS

NORTH ANNA 1 AND 2	WESTINGHOUSE
CRYSTAL RIVER 3	BABCOCK AND WILCOX
SAN ONOFRE 2 AND 3	COMBUSTION ENGINEERING
HATCH 2	GE BWR-4
GRAND GULF 1	GE BWR-6

## CONTENTS OF NEW STS

### 1.0 USE AND APPLICATION

- 1.1 DEFINITIONS
- 1.2 LOGICAL CONNECTORS
- 1.3 COMPLETION TIMES
- 1.4 FREQUENCY
- 1.5 OPERABILITY

### 2.0 SAFETY LIMITS

#### LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

- 3.0 APPLICABILITY
  - 3.1 REACTIVITY CONTROL SYSTEMS
  - 3.2 POWER DISTRIBUTION LIMITS
  - 3.3 INSTRUMENTATION
  - 3.4 REACTOR COOLANT SYSTEM
  - 3.5 EMERGENCY CORE COOLING SYSTEMS
  - 3.6 CONTAINMENT
  - 3.7 PLANT SYSTEMS
  - 3.8 ELECTRICAL
  - 3.9 REFUELING
  - 3.10 SPECIAL OPERATIONS (BWR'S)
- ### 4.0 DESIGN FEATURES
- ### 5.0 ADMINISTRATIVE CONTROLS

## HIGHLIGHTS OF CHANGES

- TECHNICAL CHANGES

- RELOCATED 40% OF REQUIREMENTS TO LICENSEE CONTROLLED DOCUMENTS
  - LICENSEES TO PROVIDE CONTROLS FOR RELOCATED REQUIREMENTS
  - REDUCED SURVEILLANCE TESTING
  - LINE ITEM IMPROVEMENTS

- RISK INSIGHTS

- SPLIT (3 CRITERIA + RISK INSIGHTS)
  - TOPICAL REPORTS ON INSTRUMENTATION COMPLETION TIMES AND SURVEILLANCE FREQUENCIES
  - SAIC EVALUATION

- HUMAN FACTORS

- WRITERS GUIDE

## SUMMARY OF IMPROVEMENTS

- FOCUSED ON OPERATIONAL SAFETY
- MORE OPERATOR ORIENTED
- STREAMLINED LCO'S AND SR'S
- HIGH DEGREE OF CONSISTENCY WITHIN EACH AND AMONG ALL STS
- BASES PROVIDE
  - REASONS FOR LCO AND SR REQUIREMENTS
  - LINK WITH SAFETY ANALYSIS
- PROMOTE BETTER UNDERSTANDING OF TECHNICAL SPECIFICATIONS
- ALLOW MORE EFFICIENT USE OF NRC AND INDUSTRY RESOURCES

Enclosure 3 to the Minutes of CRGR Meeting No. 196  
Briefing on Proposed Technical Position  
on Waste Form

December 12, 1990

TOPIC/CONCLUSION

J. Greeves, J. Surmeier and M. Tokar of NMSS provided a briefing on a proposed technical position on waste form.

The purposes of the briefing were to inform the CRGR of a significant action in accordance with a previous CRGR request and to confirm the NMSS judgment that a full CRGR review would not be needed.

The proposed action would issue new criteria for concrete used to encapsulate low level waste. The new criteria would address problems and weaknesses found using current practice. (Other waste forms such as canisters and organic materials had previously been addressed.)

The CRGR agreed that CRGR review was not needed for this item.

BACKGROUND

The draft technical position was described in a memorandum for E. Jordan from R. Bernero, dated December 6, 1990. The enclosures included:

1. Draft technical position.
2. Letter from Moeller, ACNW, to Carr, NRC, dated 9/6/90.
3. Memorandum for Bangert, NMSS, from Treby, OGC, dated 6/18/90.



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

August 23, 1990

ASTON

MEMORANDUM FOR: Edward L. Jordan, Director  
Committee to Review Generic Requirements

FROM: Frank J. Miraglia, Deputy Director  
Office of Nuclear Reactor Regulation

SUBJECT: WAIVER OF CRGR REVIEW OF PROPOSED GENERIC LETTER ON THE  
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*This is a case in which I'm not sure I agree with deletion. Response time is important and TS seemed to keep the value out front.*  
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For these plants, the licensees included the tables on response times in the Updated Safety Analysis Reports (USARs). Hence, any change to correct or update these limits in the USAR is subject to the provisions of 10 CFR 50.59. This regulation provides a means to control changes to these limits without the necessity of a license amendment as is required when they are included in TS.

The staff is proposing to issue a Generic Letter (Enclosure 1) to provide guidance on a license amendment request to remove the tables on RTS and ESFAS response time limits from plant TS. This change is being proposed as a line-item TS improvement. Enclosure 2 is a draft memorandum to Project Managers with a model Safety Evaluation Report (SER) for this TS change.

Because the proposed action involves a TS change for multiple plants, it is subject to CRGR approval. However, we recommend that the CRGR waive review of this action for the following reasons:

1. The changes described in the proposed Generic Letter do not alter TS requirements to verify the response times of safety system instrumentation.
2. The regulations provide adequate controls for changing these limits when they are placed in the USAR.
3. These actions are consistent with current practice and do not represent a new staff position. Also, this change is consistent with the proposals for the new STS that the industry developed in response to the Commission Policy Statement on TS Improvements.
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Contact: T. Dunning, OTSE/DOEA  
49-21189

*9009110165 XA 7PP*



A response to our recommendation for waiving CRGR review is requested at your earliest convenience. If you find that CRGR review of this action is necessary, we will prepare a package for CRGR review. This action is sponsored by Charles E. Rossi, Director, Division of Operational Events Assessment.

*W. Miraglia for*

Frank J. Miraglia, Deputy Director  
Office of Nuclear Reactor Regulation

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Enclosure 1

TO ALL HOLDERS OF OPERATING LICENSES OR CONSTRUCTION PERMITS FOR NUCLEAR  
POWER REACTORS

SUBJECT: REMOVAL OF TECHNICAL SPECIFICATION TABLES CONTAINING RESPONSE  
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This Generic Letter provides guidance for a license amendment request to remove the tables containing response time limits for Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) instrumentation from Technical Specifications (TS). This TS change is a line-item improvement that has been implemented in TS for recent operating licenses.

The removal of the TS tables on response time limits does not alter the surveillance requirements to verify that the response time of each RTS and ESFAS function is within its limit nor the requirement that these limits be met. However, the removal of these tables does permit administrative control of changes to the response time limits without requiring a license amendment.

With this proposed TS change, licensees should provide a commitment to include the table on response time limits in the next revision of the Updated Safety Analysis Report (USAR). Licensees may then make changes to response time limits in accordance with 10 CFR 50.59 upon determination that an unreviewed safety question does not exist. 10 CFR 50.59 provides an acceptable means by which changes to these limits may be made without prior NRC approval when they are included in the USAR.

The NRC encourages licensees and applicants to propose changes to their plant TS that are consistent with the guidance provided in the enclosure. Proposed license amendments conforming to this guidance will be expeditiously reviewed by the NRC Project Manager for the facility. Proposed license amendments that deviate from this guidance will require a longer, more detailed review. Please contact the NRC Project Manager if you have any questions on this matter.

Sincerely,

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

Enclosure:  
As stated

GUIDANCE FOR A PROPOSED LICENSE AMENDMENT REQUEST TO  
REMOVE TABLES FOR RESPONSE TIME LIMITS FROM TECHNICAL SPECIFICATIONS

INTRODUCTION

The U.S. Nuclear Regulatory Commission (NRC) is providing the following guidance for the preparation of a proposed license amendment to request the removal of the tables of response time limits for the Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) from Technical Specifications (TS). This TS change is a line-item improvement that has been implemented for recent operating licenses.

DISCUSSION

The Limiting Conditions for Operation (LCOs) for RTS and ESFAS instrumentation require that these systems be operable with response times as specified in TS tables for each of these systems. In addition, the surveillance requirements specify the testing requirements for verifying that each of these systems have response times that are within limits. The removal of the tables for the RTS and ESFAS response time limits from the TS does not alter these requirements. However, this TS change does allow administrative control of changes of the RTS and ESFAS response time limits without the necessity of a license amendment.

Licensees and applicants that wish to implement this line-item TS improvement should provide a commitment to include the tables of RTS and ESFAS response time limits in the next revision of the Updated Safety Analysis Report (USAR). Therefore, licensees may make subsequent changes to the response time limits in accordance with the requirements of 10 CFR 50.59 without NRC approval if an unreviewed safety question does not exist. The inclusion of these limits in the USAR assures that adequate measures exist to control changes.

Typically, the LCOs for the RTS and ESFAS instrumentation note that the associated instrumentation ". . . shall be OPERABLE with RESPONSE TIMES as shown in Table 3.3-2" or "Table 3.3-5." An acceptable change to the LCOs would simply state that this instrumentation ". . . shall be OPERABLE." This change will permit the removal of the referenced tables. The surveillance requirements properly state that the response times of trip functions are to be demonstrated to be within the limits. Therefore, the surveillance requirements will not require any modification to implement this change.

SUMMARY

The relocation of tables of RTS and ESFAS response time limits from TS to the USAR will permit administrative control of these limits without the need for a license amendment and with suitable procedures provided by 10 CFR 50.59 to control changes. This line-item TS improvement will eliminate an unnecessary expenditure of NRC and licensee resources when changes to these limits are required.



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

Enclosure 2

MEMORANDUM FOR: All NRR Project Managers

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

SUBJECT: GENERIC LETTER 90-

Enclosure 1 is Generic Letter 90- , which provides guidance to licensees for a license amendment request to remove tables of instrumentation response time limits from Technical Specifications (TS). Any proposal for this line-item TS improvement is voluntary.

Project Managers should review and process proposed license amendments conforming to the guidance of the generic letter. Generally, review assistance from a technical review branch should not be required to process the amendment unless the proposed TS change deviates from the generic letter guidance.

Enclosure 2 is a model Safety Evaluation Report (SER) that was prepared by the Technical Specifications Branch. This model SER should facilitate your preparation of a license amendment to implement the line-item TS improvements addressed in the generic letter. The Lead Project Manager for this task is \_\_\_\_\_ . \_\_\_\_\_ will assist you in the preparation of a no significant-hazards consideration (NSHC) pre-notice for a proposed amendment conforming to the generic letter and should be included on distribution for the amendment package.

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

Enclosures:

1. Generic Letter 90-
2. Model SER

cc w/enclosures:

J. Sniezek  
H. Thompson  
Division Directors, NRR  
Associate Directors, NRR  
Project Directors, NRR  
Regional Administrators  
J. Conran, CRGR  
C. Berlinger, DOE  
S. Treby, OGC

CONTACT:

T. Dunning, OTSD, NRR  
492-1189

## MODEL SAFETY EVALUATION REPORT

Underscored blank spaces are to be filled in with the applicable information. The information identified in brackets should be used as applicable on a plant-specific basis.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. \_\_\_ TO FACILITY OPERATING LICENSE NFP-\_\_\_  
AND AMENDMENT NO. \_\_\_ TO FACILITY OPERATING LICENSE NFP-\_\_\_  
[UTILITY NAME]  
DOCKET NOS. 50-\_\_\_ AND 50-\_\_\_  
[PLANT NAME], UNITS 1 AND 2

### INTRODUCTION

By letter of \_\_\_\_\_, 1990, [utility name] (the licensee) proposed a change to the Technical Specifications (TS) for [plant name]. The proposed change removes Technical Specifications (TS) Tables [3.3.-2 and 3.3-5] that provide response time limits for Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) instrumentation. These tables will be included in the next revision of the [plant name] Updated Safety Analysis Report (USAR). Guidance on the proposed TS changes was provided by Generic Letter 90-\_\_\_, of \_\_\_\_\_, 1990 to all holders of operating licenses or construction permits for nuclear power reactors.

### EVALUATION

Tables 3.3-2 and 3.3-5 contain values of overall system response time limits for the RTS and ESFAS instrumentation. The Limiting Conditions for Operation (LCO) for RTS and ESFAS instrumentation specify that these systems shall be operable with response times as specified in these tables. Also, these time limits are the acceptance criteria for performing tests of the response of RTS and ESFAS instrumentation in accordance with the surveillance requirements of Specifications 4.3.1.2 and 4.3.2.2, respectively. These requirements ensure that the response times of the RTS and ESFAS instrumentation are consistent with the assumptions of the safety analysis report for the mitigation of design basis accidents and transients.

Because the RTS and ESFAS response time limits are included in the TS, the licensee can make changes to update or correct errors in these limits only through the license amendment process. To eliminate the resource burden involved with changes to these limits, the NRC has issued TS for recent operating licenses without including the tables of RTS and ESFAS response time limits. However, the associated surveillance requirements include tests to ensure that the RTS and ESFAS response time limits are met and the surveillance requirements have been retained in the TS. Therefore, the requirements for response time surveillances remain unchanged, and this change affects only the control of changes to the limits. As noted in the guidance for this line-item TS improvement, the staff concluded that by placing the tables of RTS and ESFAS response time limits in the USAR, licensees may make subsequent changes to these limits in accordance to the requirements of 10 CFR 50.59 without NRC approval if an unreviewed safety question does not exist.

The licensee has proposed changes to Specification 3.3.1 and 3.3.2 that are consistent with the guidance provided in Generic Letter 90- for the removal of Tables [3.3-2 and 3.3-5] from the TS. In addition, the licensee has provided a commitment to include the tables with these limits in the next revision of the USAR. On the basis of its review of this matter, the staff finds that the proposed changes to the TS for (plant name) Unit(s) \_\_\_ are acceptable.

#### ENVIRONMENTAL CONSIDERATION

These amendments involve a change in a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes in surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is not significant increase in individual or cumulative occupational radiation exposures. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

#### CONCLUSION

The Commission made a proposed determination that the amendment(s) involves no significant-hazards consideration, which was published in the Federal Register (5 FR \_\_\_ ) on \_\_\_\_\_, 199\_. The Commission consulted with the State of \_\_\_\_\_. No public comments were received, and the State of \_\_\_\_\_ did not have any comments.

On the basis of the considerations discussed herein, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Thomas G. Dunning, OTSB/DOEA  
\_\_\_\_\_, PD \_\_\_/DRP \_\_\_

Dated: \_\_\_\_\_, 199\_

(NOTE TO PMs: A copy of this model SER may be obtained from P. Coates, X-21161 by requesting 5520 Document: "RESPONSE TIME MODEL SER")

**ACTION**



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

August 14, 1990

DA  
JC

MEMORANDUM FOR: Edward L. Jordan, Chairman  
Committee to Review Generic Requirements

FROM: Frank J. Miraglia, Deputy Director  
Office of Nuclear Reactor Regulation

SUBJECT: WAIVER OF CRGR REVIEW OF PROPOSED GENERIC LETTER ON THE  
REMOVAL OF THE SCHEDULE FOR THE WITHDRAWAL OF REACTOR VESSEL  
MATERIAL SPECIMENS FROM TECHNICAL SPECIFICATIONS

*I don't see a problem  
with the change. Please  
advise*

*EF*

The NRC has issued Technical Specifications (TS) for the reactor coolant system pressure and temperature limits for some operating licenses without the table that provides the schedule for the withdrawal of reactor vessel material specimens. The inclusion of this schedule in the TS duplicates the requirements of Section II.B.3 of Appendix H to 10 CFR Part 50 for submitting a proposed withdrawal schedule and NRC approval before its implementation.

The regulations provide an acceptable means to control changes to the schedule for specimen withdrawal without the necessity of a license amendment that is required when the schedule is included in the TS. In addition, surveillance requirements in the TS ensure that material specimens are withdrawn at the proper time.

Enclosure 1 is a proposed generic letter to provide guidance on a license amendment request to remove the schedule for the withdrawal of reactor vessel material specimens from plant TS. This change is being proposed as a TS line-item improvement. Enclosure 2 is a draft memorandum to the Project Managers that encloses a copy of the generic letter and a model SER (Enclosure 3) for processing TS changes.

Because the proposed action involves a TS change for multiple plants, it is subject to CRGR approval. However, we recommend that CRGR waive the review for the following reasons:

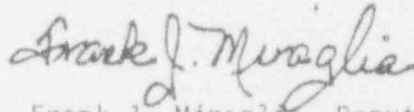
1. The changes described in the proposed Generic Letter do not alter TS surveillance requirements to remove material specimens at the proper time.
2. There are adequate regulatory controls for changing the specimen withdrawal schedule without including it in TS.
3. These actions are consistent with current practice and do not represent a new staff position. Enclosure 4 is the staff safety evaluation for this change for the Farley Units 1 & 2 TS.
4. Any licensee proposal to implement this TS change is voluntary.

Contact: T. Dunning, OTSB/DOEA  
49-21189

*49082-10157* *7PP*

August 14, 1990

A response to our recommendation for waiving CRGR review is requested at your earliest convenience. If you find that CRGR review of this action is necessary, we will prepare a package for CRGR review. This action is sponsored by Charles E. Rossi, Director, Division of Operational Events Assessment.



Frank J. Miraglia, Deputy Director  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated





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

Enclosure 1

TO ALL HOLDERS OF OPERATING LICENSES OR CONSTRUCTION PERMITS FOR NUCLEAR  
POWER REACTORS

SUBJECT: REMOVAL OF THE SCHEDULE FOR THE WITHDRAWAL OF REACTOR VESSEL MATERIAL  
SPECIMENS FROM TECHNICAL SPECIFICATIONS (Generic Letter 90- )

Technical Specifications (TS) include Limiting Conditions for Operation (LCO) that establish pressure and temperature limits for the reactor coolant system. The limits are defined by TS figures that provide an acceptable range of operating temperatures and pressures for heatup, cooldown, criticality, and inservice leak and hydrostatic testing. These limits are generally valid for a specified number of effective full power years. A program for reactor vessel material surveillance ensures the availability of data to update the inservice operating pressure and temperature limits. Vessel material specimens are used to determine changes in material properties. This program will assist in fulfilling the requirements of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR) to prevent brittle fracture of the reactor vessel.

The surveillance requirements associated with these limits specify the withdrawal schedule for the reactor vessel material specimens. Recently, the staff of the U.S. Nuclear Regulatory Commission (NRC) approved a request to remove this schedule from the TS for the Joseph M. Farley Nuclear Plant. The basis for this TS change was that Section II.B.3 of Appendix H to 10 CFR Part 50 requires the submittal to, and approval by, the NRC of a proposed withdrawal schedule for material specimens prior to implementation. Hence, the placement of this schedule in the TS duplicates the controls on changes to this schedule that have been established by Appendix H. Therefore, the staff concluded that, because this duplication is unnecessary, the removal of this TS schedule as a line-item improvement is consistent with the Commission Policy Statement on TS Improvements.

The enclosed guidance addresses the preparation of a request for a license amendment for this TS change. Licensees and applicants are encouraged to propose changes to their TS that are consistent with the guidance in the enclosure. The NRC Project Manager for the facility will expeditiously review amendment requests that conform to this guidance. Please contact the Project Manager if you have questions on this matter.

Sincerely,

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

Enclosure:  
As stated

GUIDANCE FOR THE REMOVAL OF THE WITHDRAWAL SCHEDULE FOR  
REACTOR VESSEL MATERIAL SPECIMENS FROM TECHNICAL SPECIFICATIONS

INTRODUCTION

This enclosure provides guidance for the preparation of a request for a license amendment to remove from the Technical Specifications (TS) the schedule for the withdrawal of reactor vessel material surveillance specimens. The control of changes to this schedule by way of a license amendment to modify the TS duplicates the requirements of Section II.B.3 of Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR) for the submittal of a proposed withdrawal schedule, as specified in 10 CFR 50.4, and NRC approval before its implementation.

DISCUSSION

The Limiting Conditions for Operation (LCO) for the reactor coolant system include operating limits on pressure and temperature that are defined by figures that provide an acceptable region for operation during heatup, cool-down, criticality, and inservice leak and hydrostatic testing. An associated surveillance requirement addresses the frequency for verifying that operation is within the specified limits during these operating conditions. In addition, the requirement for a separate surveillance includes the requirement that reactor vessel material surveillance specimens be removed and examined to determine changes in material properties, as required by 10 CFR Part 50, Appendix H, and in accordance with the schedule in the referenced table. The reference to this table should be deleted from this surveillance requirement along with the table providing the schedule for the withdrawal of reactor vessel material surveillance specimens. The requirement for this surveillance may also specify that the results of these examinations shall be used to update the TS figures for the pressure and temperature operating limits. If this requirement exists, it shall be retained.

The Bases for this TS provides a detailed description of the bases for this LCO and the associated surveillance requirements. The STS Bases reference the TS table that provides the schedule for surveillance specimen withdrawal and notes that the heatup and cooldown curves must be recalculated when data from the surveillance specimens indicate a change in material properties that exceeds those properties used to develop the existing pressure and temperature limits. Finally, the STS Bases include a table on the initial values of reactor vessel material properties and figures showing the effects of neutron fluence on material characteristics and predicted shifts in material characteristics.

The current STS Bases provides extensive background information on the use of the data obtained from material specimens and this clearly defines the purpose and relationship this information to the requirements included in the regulations and the ASME Code. Therefore, the removal of the schedule for specimen withdrawal from the TS will not result in any loss of clarity related to the regulatory requirements of Appendix H to 10 CFR Part 50.

If the Bases Section of this TS includes a reference to the TS table on the schedule for material specimen withdrawal that is being removed from the TS, this section should be updated to reflect the removal of this TS table.

However, to obtain a readily available copy of the NRC-approved version of the specimen withdrawal schedule, licensees should provide a commitment to include this schedule in the next revision of the Updated Safety Analysis Report (USAR).

#### SUMMARY

The removal of the schedule for reactor vessel material surveillance specimen withdrawal from the TS will not result in any loss of regulatory control because changes to this schedule are controlled by the requirements of Appendix H to 10 CFR Part 50. In addition, to ensure that the surveillance specimens are withdrawn at the proper time, the surveillance requirements for the TS on pressure and temperature limits must indicate that the specimens shall be removed and examined, to determine changes in material properties, as required by Appendix H. A request for a license amendment to remove this table from the TS may be made based upon this guidance. Licensees should include an updated STS Bases Section for this TS with this proposal if necessary to update references to the table being removed from the TS. Also, the licensee should commit to maintain the NRC-approved version of the specimen withdrawal schedule in the USAR.



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

Enclosure 2

MEMORANDUM FOR: All NRR Project Managers

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

SUBJECT: GENERIC LETTER 90-

Enclosure 1 is Generic Letter 90- which provides guidance to licensees for a request for a license amendment to remove the table with the schedule for the withdrawal of reactor vessel material specimens from Technical Specifications (TS). Any proposal for this line-item TS improvement is voluntary.

Project Managers should review and process proposed license amendments conforming to the guidance of the generic letter. Generally, Project Managers need not consult or obtain review assistance from a technical review branch unless the proposed amendment deviates from the generic letter guidance.

Enclosure 2 is a model Safety Evaluation Report (SER) that was prepared by the Technical Specifications Branch. This model SER should facilitate your preparation of a license amendment to implement this line-item TS improvement. The Lead Project Manager for this task is \_\_\_\_\_ will assist you in the preparation of a no significant-hazards consideration (NSHC) pre-notice for a proposed amendment that conforms to the generic letter and should be included on distribution for the amendment package.

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

Enclosures:

1. Generic Letter 90-
2. Model SER

cc: w/enclosures:

J. Sniezek  
H. Thompson  
Division Directors, NRR  
Associate Directors, NRR  
Project Directors, NRR  
Regional Administrators  
J. Conran, CRGR  
C. Berlinger, DOEA  
S. Treby, OGC

CONTACT:

T. Dunning, OTSE, NRR  
492-1189

MODEL SAFETY EVALUATION REPORT

Underscored blank spaces are to be filled in with the applicable information. The information identified in brackets should be used as applicable on a plant-specific basis.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
 RELATED TO AMENDMENT NO. \_\_\_ TO FACILITY OPERATING LICENSE NFP-\_\_\_  
 AND AMENDMENT NO. \_\_\_ TO FACILITY OPERATING LICENSE NFP-\_\_\_  
 [UTILITY NAME]  
 DOCKET NOS. 50-\_\_\_ AND 50-\_\_\_  
 [PLANT NAME], UNITS 1 AND 2

INTRODUCTION

By letter of \_\_\_\_\_, 1990, [utility name] (the licensee) proposed a change to the Technical Specifications (TS) for [plant name]. The proposed change removes TS Table [4.4-5] providing the schedule for reactor vessel material specimen withdrawal. Guidance on the proposed TS change was provided by Generic Letter 90-\_\_\_, of \_\_\_\_\_, 1990, to all holders of operating licenses or construction permits for nuclear power reactors.

EVALUATION

Technical Specification [3/4.4.9], "Pressure/Temperature Limits," contains a Limiting Condition for Operation for the Reactor Coolant System (RCS) that limits the rate of pressure and temperature changes to be consistent with the fracture toughness requirements of the ASME Code and Appendix G to 10 CFR Part 50. Changes to these limits are necessary because the fracture toughness properties of ferritic materials in the reactor vessel change as a function of the reactor operating lifetime (neutron fluence).

For this reason, the TS include a surveillance requirement, TS [4.4.9.1.2], to require the removal and examination of the irradiated specimens of reactor vessel material. The licensee will examine the specimens to determine the changes in material properties in accordance with Appendix H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR). Table [4.4-5] is the list of material specimens and the schedule for removal of each specimen.

The removal of the schedule for withdrawing material specimens from the TS will eliminate the necessity of a license amendment to make changes to this schedule. However, Section I.B.3 of Appendix H to 10 CFR Part 50 requires the submittal to and approval by the NRC before implementation of a proposed withdrawal schedule for material specimens. Hence, the NRC has established adequate regulatory controls to control changes to this schedule without the necessity of subjecting it to the license amendment process by including it in TS.

The licensee has provided a commitment to include this schedule in the next revision of the Updated Safety Analysis Report (USAR). Any subsequent NRC-approved revisions to this schedule would also be included in an update of the USAR. Finally, the surveillance requirements for removing material specimens remain unchanged except for the removal of the reference to Table [4.4-5].

The licensee has proposed a change to Specification [4.4.9.2] that is consistent with the guidance provided in Generic Letter 90-\_\_ for the removal of Table [4.4-5] from the TS. On the basis of its review of this matter, the staff finds that the proposed changes to the TS for (plant name) Unit(s) \_\_\_ are acceptable.

#### ENVIRONMENTAL CONSIDERATION

These amendments involve changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). The basis for this determination is that the removal of the schedule for removing material specimens from the TS does not alter the necessity for formal NRC approval of changes to the schedule as established by Section II.B.3 of Appendix H to 10 CFR Part 50. Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this(these) amendment(s).

#### CONCLUSION

The Commission made a proposed determination that the amendment(s) involve no significant-hazards consideration, which was published in the Federal Register (5\_ FR \_\_\_ ) on \_\_\_\_\_, 199\_. The Commission consulted with the State of \_\_\_\_\_. No public comments were received, and the State of \_\_\_\_\_ did not have any comments.

On the basis of the considerations discussed above, the staff concludes that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Thomas G. Dunning, OTSB/DOEA  
\_\_\_\_\_, PD\_\_\_/DRP\_\_\_

Dated: \_\_\_\_\_, 199\_

(NOTE TO PMs: A copy of this model SER may be obtained from P. Coates, X-21161 by requesting 5520 Document: "MATERIAL SPECIMEN GL MODEL SER")



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 79 TO FACILITY OPERATING LICENSE NO. NPF-2  
AND AMENDMENT NO. 71 TO FACILITY OPERATING LICENSE NO. NPF-8

ALABAMA POWER COMPANY

JOSEPH M. FARLEY NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-348 AND 50-364

1.0 INTRODUCTION

By letter dated January 28, 1988, as supplemented May 20, 1988, the Alabama Power Company submitted a request for changes to the Joseph M. Farley nuclear Plant, Units 1 and 2, Technical Specifications.

The amendment deletes the Surveillance Specimen Withdrawal Schedule, Table 4.4-5 from the Technical Specifications (TS). Also, a portion of paragraph 4.4.10.1.2 relating to the reactor vessel material irradiation surveillance withdrawal table shall be removed and relocated to the Final Safety Analysis Report (FSAR). The program for surveillance of reactor vessel material would continue to be governed by 10 CFR Part 50, Appendix H.

2.0 EVALUATION

Technical Specification 3/4.4.1, "Pressure/Temperature Limits," contains a Limiting Condition for Operation for the Reactor Coolant System (RCS). Thus, the pressure and temperature changes in the RCS during heatup and cooldown are limited to be consistent with requirements of the ASME Code, Section III, Appendix G, 10 CFR Part 50. Changes to these limits are necessary since the fracture toughness properties of the ferritic materials in the reactor vessel change as a function of reactor operating lifetime (neutron fluence).

For this reason, a surveillance requirement, specifically TS Section 4.4.10.1.2, exists to require removal and examination of the reactor vessel material irradiation specimens. The specimen examination would be used to determine the changes in material properties in accordance with Appendix H, 10 CFR Part 50. Table 4.4-5 was the established list of specimens and the schedule for removal for each specimen.

The licensee initially proposed to delete TS Section 4.4.10.1.2 in its entirety. This deletion would have deleted Table 4.4-5 and the requirement for the removal, examination, and analysis of the test specimens. Also, the licensee proposed to add the specimen removal schedule to the next FSAR update. This action was completed in FSAR Revision 6, July

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1988, Table 5.4-14. Following discussions with the NRC staff, the licensee revised the earlier proposal by letter dated May 20, 1988, based on our concerns.

We have reviewed the licensee's revised proposal. The proposal will retain the portion of the TS Section 4.4.10.1.2 requiring removal, examination, and determination of changes in material properties required by Appendix H, 10 CFR Part 50. The change is considered acceptable for the following reasons:

1. The previously approved surveillance table is now contained in a licensee controlled document, the FSAR.
2. Pursuant to 10 CFR Part 50, Appendix H, changes to this previously approved schedule would require NRC staff approval.
3. The TS surveillance requirement is maintained to require removal, examination, and determination of changes in material properties pursuant to 10 CFR Part 50, Appendix H.

### 3.0 ENVIRONMENTAL CONSIDERATION

These amendments change the surveillance requirements. The staff has determined that these amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released off site; and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration, and there has been no public comment on such finding. Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

### 4.0 CONCLUSION

The Commission made a proposed determination that this amendment involves no significant hazards consideration which was published in the Federal Register (53 FR 22398) on June 15, 1988, and consulted with the State of Alabama. No public comments or requests for hearing were received, and the State of Alabama did not have any comments.

The Staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: E. Reeves

Dated: August 22, 1988