

MAR 11 1983

MEMORANDUM FOR: Cecil O. Thomas, Chief
 Standardization & Special Projects Branch
 Division of Licensing

FROM: Donald S. Brinkman, Section Leader, STS Section
 Standardization & Special Projects Branch
 Division of Licensing

SUBJECT: MINUTES OF MARCH 7, 1983 MEETING WITH NUS
 CORPORATION AND SEVEN UTILITIES

Members of the NRC staff met with representatives of NUS Corporation and seven utilities (Cleveland Electric Illuminating Co., Arkansas Power & Light Co., Florida Power & Light Co., Florida Power Corp., Iowa Electric Light & Power Co., Power Authority of New York, and Carolina Power & Light Co.) on March 7, 1983. The meeting was also attended by representatives from a Westinghouse Owners Group and from Bechtel Power Corporation. Enclosure 1 is a list of the meeting attendees. The meeting had been requested by NUS Corporation to present to the NRC staff proposed criteria for determining the content of technical specifications and supplemental specifications in response to the proposed rulemaking on technical specifications (10 CFR Part 50.36). They recommended that proposed specific criteria be adopted to replace or supplement the more general criteria in the proposed rule. Enclosure 2 is a copy of the criteria proposed by NUS Corporation and the seven utilities.

In addition to describing this proposed criteria, the industry representatives:

1. Recommended that the final rule include provisions which would permit licensees with custom technical specifications to adopt the features of the proposed rule without being required to adopt the content and format of the Standard Technical Specifications.
2. Recommended that the final rule include provisions which would specify that if a licensee-initiated change to a supplemental specification was not revoked by the NRC within a specified time interval, the change would be considered acceptable and no longer subject to revocation.

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- 3. Offered to assist the NRC staff in the development of specific criteria for determining the content of technical specifications and supplemental specifications as well as to assist in the actual division of the existing STS. This offer of assistance was expressed by both the NUS-organized group of seven utilities and by the representatives of the Westinghouse Owners Group.

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Donald S. Brinkman, Section Leader
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Enclosures:
 As stated

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- Document Control
- NRC PDR
- PRC
- SSPB Reading
- C. Thomas
- D. Brinkman
- M. Schoppman, NUS
- R. Jansen, W
- G. Copp, Duke Power
- F. Anderson
- D. Hoffman
- R. Bottimore
- E. Hill, Bechtel

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DATE	3/10/83	3/10/83					

Attendance List

March 7, 1983

<u>Name</u>	<u>Organization</u>
D. Brinkman	NRC/SSPB
F. Anderson	NRC/SSPB
C. Thomas	NRC/SSPB
D. Hoffman	NRC/SSPB
R. Bottimore	NRC/SSPB
K. Wilson	Florida Power Corp.
G. A. Copp	Duke Power Co.
R. Jansen	Westinghouse
B. W. Reid	Iowa Electric
C. S. Orogvany	Cleveland Electric Illuminating Co.
J. Dietrich	Carolina Power & Light Co.
B. Murray	Carolina Power & Light Co.
E. Hill	Bechtel
M. A. Schoppman	NUS Corp.
A. Ross	NUS Corp.
B. Naft	NUS Corp.
G. Wilverding	PASNY

CRITERIA FOR DETERMINATION OF
TECHNICAL SPECIFICATIONS
VERSUS
SUPPLEMENTAL SPECIFICATIONS

INTRODUCTION

The USNRC has proposed via FR 82-8515, dated March 30, 1982, entitled "Technical Specifications for Nuclear Power Reactors", to revise 10CFR50.36 to reflect a proposed division of existing technical specifications into two categories: New Technical Specifications (NTS) and Supplemental Specifications (SS). The criteria presented below have been developed to allow for the division into New Technical Specifications and Supplemental Specifications to be made based on specific individual characteristics of each specification. Criterion 1 may be used to establish which specifications may be classed as technical specifications based on system function and status. This criterion should be used to establish the initial segregation of specifications. (Those specifications not meeting Criteria 1 would be assigned to the Supplemental Specification category.) Criteria 2 through 6 are used to further segregate the technical specifications identified by Criterion 1 into the NTS and SS categories. Time relationships between a limit being reached and the need for corrective action, the relationship of the specification to primary system functions, active versus passive features of the function, and documentation requirements are used as tests to determine whether a specification should be classed as technical or supplemental.

It should be noted that application of the criteria may result in division of existing technical specifications into both categories. Portions of an existing technical specification section may be classed as an New Technical Specification while the remaining portions of the section may be classed as an SS.

Criterion 1 - Safety-Related Function

Four safety functions are identified in the NRC discussion of the proposed rule in paragraph 1, "General Principles." The four safety functions are:

1. protecting the integrity of fission product barriers,
2. controlling reactivity,
3. cooling the fuel, and
4. limiting the release of radioactive fission products following an accident.

Those primary plant systems essential to achieve these functions are considered to be of immediate importance to safety.

In general, all plant technical specifications associated with the above safety functions should be categorized as Technical Specifications, unless they meet Criteria 2, 3, 4, 5, or 6 below.

Safety function activities which require that:

1. values of process variables be kept within certain bounds,
2. operating state of equipment (e.g., valve position) be maintained, or
3. operating status (or operability) of equipment be maintained.

. . . should be classified as Technical Specifications. The above three active functions are under the direct and constant control of the plant operations staff to maintain safe plant conditions.

Criterion 2 - Licensed Operator Responsibility and Response Time

Certain plant specifications may involve activity which, although related to safety functions, do not require immediate responses to ensure the health and safety of the public. Non-primary leak detection, radioactive material filter checking, and long-term monitoring provisions are examples of long-term activities related to safety functions. Correction action times on the order of one week or longer are usually associated with long-term activities. These activities are usually performed by organizations other than operations, such as maintenance, chemistry, and health physics. These long-term activities should be classified as Supplemental Specifications.

Criterion 3 - Secondary Features (Supporting Systems or Specifications)

Systems or specifications which could not cause a loss of safety function directly, but whose resultant loss could inhibit the safety function, can be termed secondary features. These secondary features (supporting systems) support the safety functions but do not result in loss of safety function immediately upon failure. Secondary feature failure results in a slow-acting (i.e., safety limit is approached at a very slow rate) or minor deterioration of safety-related systems or components which is correctable through use of redundant systems or components or through long-term corrective action. Examples of secondary features are functions associated with mitigation of natural or man-made phenomena (fires, floods, earthquakes, etc.). Also included in this category are ventilation, structural support, thermal overload protection and bypass devices, etc. Secondary effect specifications should be classified as Supplemental Specifications. NOTE: Systems which provide direct motive force, such as diesel generators and safety-related air systems, are not considered secondary nor are systems which are necessary to maintain immediate safety functions, such as component cooling water.

Criterion 4 - Static Design Features

Plant design features which remain fixed during the plant design and are not changeable through normal, active operation of plant system components should be classified as Supplemental Specifications. Pressure testing of piping systems, containment leak rate testing, ultimate heat sink, and non-accident radiation monitoring are examples of systems which are static or systems which measure static design features of the plant.

Criterion 5 - Format and Staffing

Specifications which dictate the form of the activity rather than the substance of the activity should be classified as Supplemental Specifications. Examples of specifications which consider form rather than substance are identification of particular persons to accomplish safety functions, tabular data which lists plant-specific equipment designators, organization charts, etc.

Criterion 6 - Reporting Requirements

All reporting format and schedule requirements are deemed to be Supplemental Specifications since there is no immediate impact on plant safety by failure to comply with the requirements. Only the requirement to report incidents should be indicated in the NTS. Reference should be made in the NTS to the appropriate Supplemental Specification which details schedule and format of the report.