

Washington Public Power Supply System

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September 15, 1982

G02-82-784

SS-L-02-PLP-82-064

Mr. Thomas M. Novak
Assistant Director for Licensing
Division of Licensing, UNRR
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Novak:

Subject: LRG-I LICENSING ACTIVITIES AND
TECHNICAL SPECIFICATIONS PROGRAM

Since May 1980, the Licensing Review Group, now called LRG-I (LaSalle, Susquehanna, Zimmer, Shoreham, Fermi-2 and WNP-2 plants), have been working with NRR to resolve common issues in support of the NTOL licensing activities of the member utilities. Approximately 90 issues were handled (initially) by the member utilities in the context of LRG-I. NRC has, to date, issued one full power license, one 5% power license, five SER's, and 13 SSER's, attributable in some measure to the LRG-I effort. We appreciate the enthusiastic NRR management support of our objectives and strongly urge that it continue with the principal mutual goal of conservation of resources in the licensing process.

The LRG-I Executives met on July 29, reviewed the activities of the LRG-I Working Group to date, and authorized continuing the program through the next 12 months. In particular, the Executives directed that the Working Group place more emphasis on the Technical Specifications generic activity, which is the general subject of this letter. In light of the Executives decisions we look forward to renewed Standardization and Special Projects Branch activity with emphasis on project management and Tech Spec support of LRG initiatives.

For several months, perhaps for reasons beyond your control and ours, there has been insufficient NRR project management effort, resulting in a severe impact in our Tech Spec review program. The program was initiated in February 1982, with the Division of Safety Technology, with a follow-up meeting in March when 10 specific issues were discussed. An additional eight (8) issues were discussed in a subsequent June 23 meeting, but without any review staff feedback documenting the results of the March meeting. Our July 13 letter to Mr. Robert Tedesco provided the documentation for the June meeting since no meeting minutes were anticipated. However, we have not been provided with any feedback from the reviewers, which we understand is the most we should anticipate under the strictures of NRR Office Letter No. 38.

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The LRG-I Working Group and Tech Spec Group representatives met in Bethesda August 24-25 to review the Tech Spec effort to date, and to select particular proposed Tech Spec changes having high cost/benefit impact for additional effort. (A planned meeting with the NRR staff had to be postponed owing to an inability to commit staff resources for adequate preparation for the meeting.) The structure of this additional effort follows directly along the lines outlined in the April 21, 1982, NRR Office Letter No. 38 procedures for changes to generic Technical Specifications.

However, before we are able to give full attention to the issues we have identified for additional effort, I would like to recap for you what we believe is the status on the presently-pending 18 issues that already have been provided for staff consideration as a consequence of our previous meetings with DST representatives. As you will see, a few of these issues have considerable impact on licensing, and have been selected for extra effort. (Note: Background information on the first 10 issues can be found in NRR's April 6, 1982, Meeting Minutes, and the remaining eight (8) issues can be found in the enclosure to our July 13, 1982, letter to Mr. Tedesco.)

1. Control Rod Operability - The staff agreed to reconsider its previous STS prohibiting reactor startup with any control rod inoperable. Our proposed change would permit some operational flexibility that would have significant impact on plant operations. We believe this is a high cost/benefit item, and we need feedback from the staff in order to determine whether additional development effort is required.
2. Snubbers - A relaxation of surveillance requirements would also have high cost/benefit impact. The LRG recognizes that additional work on its part is required in support of this proposed change, and has instituted such effort.
3. Recirculation Pump Operability - We believe the appropriate change has already been accomplished for STS, and assume that individual plant specs will reflect the change.
4. Isolation Actuation Instrumentation Response Times - We are awaiting staff views on this matter. We consider it a high impact item and would plan to continue working on it until an effective resolution can be accomplished.
5. End-of-Cycle Recirculation Pump Trip System Response Time - Although the staff has not yet agreed to the elimination of the surveillance requirement, the frequency has been reduced. The requirement still has impact, but the cost/benefit has been repositioned into a reasonable range.

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(Note: Issues 6-10 have been characterized as clarifications).

6. MSIV Leakage Rate Limits - We believe the clarification reflected in this proposed change has been accommodated in the STS.
7. Plant Systems Actuation Instrumentation - This clarification has likewise been incorporated into the STS.
8. Operational Leakage - We are still awaiting staff feedback on this issue.
9. APRM Flow-Biased Simulated Thermal Power - Footnote g of Table 4.3.1.1-1 needs clarification to match real situations. Although the STS has not been changed, we believe the LaSalle Tech Specs reflect the staff's agreement of the proposed clarification.
10. Pressure/Temperature Limits - The maximum allowable temperature change rate during inservice hydrostatic and leak testing operations is characterized in the STS as a plant-specific number. The LRG-I believes that a 20°F is justified generically. The LaSalle and Susquehanna specs show 20°F. We believe an STS change would be appropriate, and would remove a needless review item in the preparation of plant-specific specs.
11. MSIV Closure Times - We are still awaiting feedback from the staff on this issue which would make the spec consistent with the Safety Analysis and the Startup MSIV Function Test.
12. APRM Setpoints - This proposed change would obviate the need for changes with every new core configuration. As such, it is an item worth pursuing on a cost/benefit basis. (The problem is that the concept of "total peaking factor" is obsolete.)
13. Instrumentation Specs - This is not a change. We propose to put several instrumentation specs where they belong in the instrumentation section. We believe this change in format would improve the specs considerably, and would make it easier for plant personnel to use specific Tech Specs.
14. Purge Valve Leak Rate Testing - The STS now include specific leak rate requirements for purge valves. Inclusion in the Appendix J combined total is no longer appropriate. We appreciate that an exemption to Appendix J might be involved, but the proposed change has merit and ought to be considered.

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15. ECCS Operability - The footnote on Spec 3/4.5.2 is in conflict with other specs. The footnote should be clarified or perhaps deleted. What is needed is a cross-referencing with related specs which all utilities do as a matter of course. We agree that this is a low priority matter, but it is a useful clarification to aid operators, which is desirable in its own right.
16. Position of Valves in the Fire Protection System - The present spec requires more for this system than is required for such systems as ECCS. We appreciate the firmly-held view of CHEB that the spec should not be relaxed, but there are ALARA considerations involved.
17. RPS Response Times - The focus of this change is to determine the thermal power time constant rather than response time, which is more safety-significant. It is also more efficient and cost-effective. Although this change is not as important as many of the others, it is worth pursuing.
18. TIP Shear Valve Testing - We believe Spec. 4.6.3.5 should be deleted. It does have ALARA significance, is costly, yet has no safety significance. Furthermore, NRR (Memo: Hanauer to Denton, dated March 26, 1982) considers such testing to be a matter of no priority. In the spirit of prioritization we should expect that it would be deleted from the STS and from corresponding plant-specific Tech Specs.

In addition to these 18 matters for which reviewer feedback is required, we plan to go forward toward resolution of the principal Tech Spec issues that we believe have significant cost/benefit that argue for change. We would expect to work within the requirements of Office Letter No. 38 where additional effort beyond that thus far expended is necessary. We believe such effort will conserve both NRC and LRG resources and that it will be of significant benefit to the utility operators. I want to re-emphasize that we are committed to follow and are in full support of the principles of Office Letter No. 38.

To give you some indication of the matters that we believe deserve this special attention, I will list them below, using Roman Numerals to avoid confusion with the previous listing. As you will see, three (3) are from the initial compilation, two (2) from the second compilation, and six (6) are new issues. The present 11 issues are:

- I. Snubbers (a.k.a. Issue 2)
- II. Control Rod Operability (a.k.a. Issue 1)
- III. Isolation Actuation Instrumentation (a.k.a. Issue 4)
- IV. Valve Positions in Fire Protection Systems (a.k.a. Issue 16)
- V. APRM Setpoints (a.k.a. Issue 12)
- VI. A.C. Sources (3/4.8.1) (New Issue)
- VII. ATWS Time Limit for Restoring Trip Systems (3.3.4.1e) (New Issue)
- VIII. Reactivity Control Systems (3/4.1) (New Issue)
- IX. Rod Sequence Control System (3/4.1.4.2) (New Issue)

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- X. Reactor Coolant System Chemistry (3/4.4.4) (New Issue)
- XI. Pressure Boundary Valve Testing (3.4.3.2d) (New Issue)

The priority of these 11 matters is roughly as I have them listed.

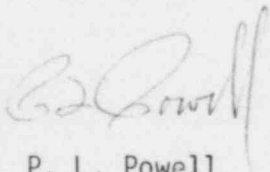
At our August 24-25, meeting, in addition to assigning priorities, we initiated specific programs on several of the issues and assigned responsibilities for developing program proposals for the remaining issues that are not critically impacted by lack of staff feedback. In addition, we are considering other issues that have not yet progressed to the description stage.

In light of the above, we need the following from NRR to permit further progress on our generic Tech Spec program:

- a. A meeting to obtain feedback on the initial 18 issues.
- b. Meetings with appropriate reviewers to discuss aspects of the individual high cost/benefit items to be able to prepare the necessary justification documentation in the spirit of Office Letter No. 38.

We know that the LRG Executives and NRR Executives endorse and support the objectives of the LRG-I program, and that considerable cost/benefits are at stake. Our Executives are insisting that we exhaust all avenues of effort before they agree to become directly involved. Please let us know when the requested meetings we need can be held. We would propose October 20, 1982, for the next Working Group meeting. We would also appreciate any other advice you might have on the conduct of this important LRG-I program.

Very truly yours,



P. L. Powell
Licensing Review Group Chairman

jca

cc: R Artigas - GE
RS Boyd - KMC
N Coddington - PP&L
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