



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

JUL 15 1985

MEMORANDUM FOR: H. Thompson, Director, Division of Licensing, NRR
FROM: R. Starostecki, Director, Division of Reactor Projects,
Region I
SUBJECT: REQUEST FOR TECHNICAL INTERPRETATION

A recent event at a Region I nuclear power plant emphasized the need to obtain clarification, and provide a basis for the start time of imposing TS ACTION STATEMENT "clocks" when equipment is found or discovered inoperable vs. when a determination can be made as to the time of the cause for inoperability.

As an example, a main steam line flow indicator was declared inoperable at time "X" when it was discovered that it failed to respond properly to steam flow and troubleshooting methods. It immediately became obvious that the cause of the equipment failure was due to maintenance which reversed the high and low pressure sensing legs and the instrument could not have functioned properly for a period of time "Y" which exceeds the TS imposed ACTION STATEMENT time period. Is the intent to require the plant to affect a prompt shutdown since a loss of function existed from time "Y" or is it acceptable to initiate the ACTION STATEMENT from the discovery at time "X"?

This issue is further complicated by recent trends in NRC enforcement which cite the historical inoperability of equipment as a factor in determining the significance of loss of function violations.

For your consideration a proposed interpretation is enclosed.

Richard W. Starostecki, Director
Division of Reactor Projects

cc:
Director, DRS
Director, DRSS

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712 on 10/19/94

PROPOSED INTERPRETATION

Purpose

To provide a basis for the start time in computing degraded operation under a TS ACTION STATEMENT when equipment is found inoperable.

Discussion

When equipment covered by a Technical Specification Limiting Condition for operation is found or rendered inoperable, continued plant operation is governed by the applicable TS ACTION STATEMENT.

Equipment is found (i.e. discovered) inoperable by; (1) failure to pass a periodic surveillance test, (2) inspection, or (3) discovery of a condition, not previously revealed by testing which calls into question the ability of the equipment to function as designed.

In each of the above cases, the ACTION STATEMENT "clock" starts when the equipment is found to be inoperable. This is applied even in those cases where the failure mode clearly indicates inoperability for some time (e.g. due to design, installation, maintenance, or testing errors). Since a long period without challenge has no bearing on the probability of a challenge in the near future, this application is consistent with other approved degraded mode operating conditions.

In those cases where a loss of function exists (e.g. both trains similarly affected), the above practice should result in a prompt shutdown as required by the application of the Technical Specifications (e.g. STS 3.0.3).
