

NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

MAY 1 1 1999

Scientech, Inc.

ATTN: Mr. Douglas Knight

910 Clopper Road

Gaithersburg, MD 20878

SUBJECT: TASK ORDER NO. 242 ENTITLED, "REVIEW POINT BEACH 1 & 2 CONVERSION

OF CURRENT TS FOR ELECTRICAL POWER SYSTEMS TO IMPROVED TS BASED ON

STANDARD TS" UNDER CONTRACT NO. NRC-03-95-026

Dear Mr. Knight:

In accordance with Section G.5, <u>Task Order Procedures</u>, of the subject contract, this letter definitizes Task Order No. 242. This effort shall be performed in accordance with the enclosed Statement of Work.

Task Order No. 242 shall be effective the date of award through December 31. 1999. The total cost ceiling is \$14,000.00, of which the amount of \$12,950.00 represents the reimbursable costs, and the amount of \$1,050.00 represents the fixed fee.

The task order obligates funds in the amount of \$14,000.00. Accounting data for this Task Order is as follows:

B&R No.: 920-15-101-105

FIN No.: J-2414

APPN No.: 31X0200.920

BOC No.: 252A

OBLIGATED AMOUNT: \$14,000.00

The following individual(s) are considered to be essential to the successful performance of the work hereunder:

Mr. Edward Lozito

The Contractor agrees that such personnel shall not be removed from the effort under the task order without compliance with Contract Clause H.1. <u>Key Personnel</u>.

9905240139 990517 PDR CONTR NRC-03-95-026 PDR Dfor

Your contacts during the course of this task are:

Technical Matters:

Larry Ruth

Project Officer (301) 415-1211

Craig Harbuck Technical Monitor (301) 415-3140

Contractual Matters:

Carolyn A. Cooper Contract Specialist (301) 415-6737

The issuance of this task order does not amend any terms or conditions of the subject contract.

Please indicate your acceptance of this task order by having an official who is authorized to bind your organization, execute three copies of this document in the spaces provided below and return two copies to the Contract Specialist. You should retain the third copy for your records.

Sincerely,

Sharon D. Stewart, Contracting Officer
Contract Management Branch No. 2
Division of Contracts and Property
Management
Office of Administration

Enclosure: As stated

ACCEPTED:

NAME

Melissa H. Aufmuth Contracts Manager

TITLE

5/17/99

DATE

Statement of Work Task Order No. 242

Title: Review and Evaluation of the Point Beach 1 & 2 Nuclear Plant Application for Conversion to the Improved Technical Specifications - Electrical Systems

Project Manager: Mark Reinhart

(301) 415-3185; fmr@nrc.gov

Technical Monitor: Craig Harbuck

(301) 415-3140; cch@nrc.gov

1.0 BACKGROUND

The Technical Specifications Improvement Program was initiated by the Nuclear Regulatory Commission's (NRC) February 1987 interim Commission Policy Statement on Technical Specification Improvements. In support of this program, industry Owners Groups have worked with the NRC's Office of Nuclear Reactor Regulation (NRR) to develop improved Standard Technical Specifications (STS). The objective of this effort was to improve operational safety. This was accomplished by focusing the technical specifications (TS) on the most safety significant requirements, reducing challenges to safety systems, improving the Bases, applying human factors principles, and allowing more efficient use of NRC and industry resources through reduction in the number of licensing actions. These objectives are reflected in the STS for five basic reactor design types: Babcock & Wilcox (NUREG-1430), Westinghouse (NUREG-1431), Combustion Engineering (NUREG-1432), General Electric BWR/4 (NUREG-1433), and General Electric BWR/6 (NUREG-1434).

2.0 OBJECTIVE

The NRC requires contractor expertise to support technical review and evaluation of proposed changes for developing plant-specific conversions to improved TS (ITS) based on the STS. Technical review expertise includes documenting the adequacy of proposed conversion to the ITS to meet the current licensing basis as it pertains to current TS (CTS) requirements and associated Bases. Decisions must be based on sound engineering judgment consistent with the Commission's regulations, 10 CFR 50.36, "Technical Specifications," the Commission's Final Policy Statement on Technical Specifications Improvements, the STS and pertinent regulatory documents such as NUREGs, Regulatory Guides, Safety Evaluation Reports (SERs), and NRC enforcement guidance.

The scope of this project is Point Beach 1 & 2 ITS Section 3.8, Electrical Power Systems, which is a part of the license amendment application by Power Authority of State of New York to convert the Point Beach 1 & 2 Nuclear Plant CTS to the ITS. The contractor performs a technical review of proposed changes to CTS requirements such as limiting conditions for operation (LCOs) with the associated applicability, action, and surveillance

requirements. In addition, the contractor performs a technical review of the Bases proposed for ITS Section 3.8.

The ITS conversion application contains discussions of changes (DOCs) to justify changes to CTS requirements in the following general categories: relocated requirements, more restrictive requirements, less restrictive requirements, and administrative. In addition, justifications for differences (JFDs) between the proposed ITS requirements and the corresponding STS requirements are presented based on either plant unique design, or a decision by the licensee to retain the CTS requirement.

The contractor prepares a written technical evaluation report (TER) as the product of the technical review. The TER consists of a series of comments describing instances where additional information is needed to complete the review of ITS Section 3.8. In the course of reviewing the justifications associated with translating the CTS to the ITS (both DOCs and JFDs), the contractor assesses the acceptability of the technical changes to the CTS and differences from the STS. The contractor also assesses whether each DOC and JFD contains sufficient information to establish an accurate and complete safety basis for the change or difference addressed. In addition, the contractor reviews the ITS Bases to ensure the conforming changes to the STS Bases accurately explain the corresponding ITS requirements.

3.0 TECHNICAL AND OTHER SPECIAL QUALIFICATIONS REQUIRED

Successful performance of this contract requires competent expert TS reviewers with a thorough understanding of all sections of the STS, significant experience in conversion of CTS into the standard format, or significant experience in development of the STS NUREGS for issuance. The qualified reviewer must be experienced in the TS review areas identified above as the scope of the project. Significant (at least ten years) experience is required to be from work in the development of TS in the following projects: operating license TS for commercial nuclear power plants, TS for nuclear steam supply system vendors, and TS for conversion to the STS format from a custom or standard format. This contract requires a person with an engineering degree or a science degree and over 15 years experience in the nuclear field with at least 10 years of experience in TS issues and in the development of the STS NUREGs. This contract also requires a high level of proficiency in the use of WordPerfect 6.1 and strong writing skills.

The NRC will rely on the representation made by the contractor that all information contained in the technical and cost proposals, including the qualifications of the assigned reviewers and the reviewers' resumes, is accurate and truthful.

and the first of the second

4.0 WORK REQUIREMENTS AND SCHEDULE :

The contractor shall be required to review the part of the Point Beach 1 & 2 ITS conversion submittal related to electrical power system requirements. The purpose of this review is to determine which of the proposed changes to these CTS requirements can be accepted as demonstrating compliance with 10 CFR 50.36, "Technical Specifications," the Final Policy Statement on Technical Specifications Improvements, and the Fitzpatrick Nuclear Plant licensing basis as established in the Safety Analysis Report and the Safety Evaluation Report, as supplemented. Upon requested by the technical monitor, the contractor will also be required to assist in working conference telephone calls to establish an adequate basis of disposition of proposed changes to these CTS requirements through presentation of positions with necessary supporting documentation. Work under this project will typically involve performance of the following tasks over a four week period. The exact schedule for performance of these tasks will be determined prior to commencement of work.

- Review the ITS, the CTS markup and DOCs, and the STS markup and JFDs associated with converting the CTS to the ITS. This includes review of deviations from the STS Bases. For each change to the CTS and deviation from the STS, assess the acceptability of the licensee's justification. Also, identify CTS changes and STS deviations for which no justification is provided. Prepare comments regarding any CTS change or STS deviation for which additional information is needed to establish an accurate and complete safety basis for the change or deviation. These comments will clearly describe the issue and an acceptable way for the licensee to resolve the concern. Also, identify in comments any proposed changes that are beyond the contractor's review scope, as defined in Section 9.0 of this SOW. Comments identified in this task are documented in the TER under Task 3.
- Task 2 Participate in working conference telephone calls and discussions, when requested by the Technical Specifications Branch (TSB) staff and approved by the TM, to resolve comments or to answer questions.
- Task 3 Prepare a TER consisting of the comments identified in Task 1. TER format is described in Section 9.0 of this SOW.

5.0 DELIVERABLES

5.1 <u>Technical Reporting Requirements</u>

At the completion of Tasks 1 and 3, submit a Technical Evaluation Report (TER) to the TM. In addition, send the TM the electronic file containing the TER either in a diskette or by electronic mail. Assistance under Task 2 may be required subsequent to completion of Tasks 1 and 3 and issuance of the TER.

6.0 MEETINGS AND TRAVEL

Travel is not anticipated under this project. However, under Task 2, up to four person-hours of contract reviewer participation in telephone conferences may be necessary to resolve issues identified in Task 1. The contract reviewer shall participate in the telephone conferences at the direction of and with the prior approval of the TM.

7.0 NRC-FURNISHED MATERIALS

The TM will provide the contractor with hard copies and the WordPerfect 6.1 electronic files corresponding to the Point Beach 1 & 2 Nuclear Plant ITS Section 3.8 submittal received from the licensee by the NRC. Upon request, the TM will provide the contractor copies of industry technical specifications task force (TSTF) review packages for NRC-approved generic changes to the STS. Also upon request, the TM will provide the contractor with docketed information related to the design and operation of electrical power systems at Point Beach 1 & 2 Nuclear Plant.

8.0 OTHER APPLICABLE INFORMATION

8.1 <u>License Fee Recovery</u>

All of the work specified in this SOW is license fee recoverable.

8.2 Property Management

It is not expected that the contractor will be required to purchase any equipment, including computer hardware or software, to perform the work contemplated under this project. To ensure work product compatibility with NRC requirements, the contract reviewer shall have access to at least the following equipment (or comparable) for use under this contract:

- IBM compatible personal computers that produce document files on 3½ inch doublesided double-density diskettes.
- Hewlett Packard LaserJet Series V or VI printers with the true type Universal 11 point font series.
- WordPerfect 6.1 for Windows software.
- Capability to transmit WordPerfect 6.1 files to the TM via e-mail.

9.0 ADDITIONAL GUIDANCE

The following types of changes are beyond the scope of the contractor's review.

- a. ITS requirements that represent changes to the CTS and that are also different from the STS are beyond the scope of changes necessary for converting to the ITS. Bracketed information in the STS is meant to be replaced by plant-specific information based on the CTS and the current licensing basis. A change to such an existing requirement is also considered beyond the scope of the contractor's review.
- b. Differences from the STS based on pending generic change proposals (TSTF and Editorial items). Approved generic changes are considered part of the STS. When such differences correspond to changes in the CTS, the contract reviewer may offer technical comments. Generic differences corresponding to CTS requirements being retained fall within the scope of the contractor's review.
- c. Proposed changes to the CTS submitted before or separate from the ITS submittal but that are still under NRC review. These changes are treated as having been approved in the proposed ITS.

The contractor will add to the TER at the end of the comments for each LCO, a series of comments describing any changes categorized as "beyond contractor review scope" (BCRS) items.

9.2 TER Format

The following example illustrates the general format to be used for comments in the TER.

----- example -----

3.8.1-09 DOC A1

ITS SR 3.8.1.11.c CTS 4.8.1.1.2.e.4.b

STS SR 3.8.1.11.c requires that the DG auto-starts from standby condition. This requirement is adopted in corresponding ITS SR 3.8.1.11.c and is a change relative to CTS 4.8.1.1.2.e.4.b. DOC A1 does not explain why the proposed change is administrative. Comment: Revise DOC A1 to provide the appropriate justification.

Licensee Response:	

- Comments are numbered consecutively with a prefix denoting the specification.
 Use bold typeface.
- b. Indented from the comment number, list any DOCs and JFDs for the proposed change/difference that is the subject of the comment. If a comment relates to a Bases JFD, refer to the JFD as a "Bases JFD," For example, JFD 2 for Bases deviation would be listed as Bases JFD 2.
- c. Also indented from the comment number, list <u>only</u> the CTS, ITS, and STS requirements that are germane to the comment or issue.
- d. Following the list of relevant justifications and requirements, <u>briefly</u> describe the proposed change, difference, or other issue related to the comment.
- e. Following a description of the change, difference, or issue, state the comment. The statement must be meaningful. For example, writing "Inadequate justification" is not enough. "The justification is inadequate because" is better.
- f. Following the comment, insert in bold typeface "Licensee Response:" to indicate to the licensee where to place ITS response to the comment. End each comment with a horizontal line using the WordPerfect 6.1 graphics feature, as illustrated in the example.
- g. The electronic file for the TER should be prepared using true type Universal 11-point font series and in WordPerfect 6.1 format.