

September 10, 1999

Mr. James Davis, Director  
Operations Department  
Nuclear Energy Institute  
1776 I Street, N. W.  
Suite 400  
Washington, DC 20006-3708

Dear Mr. Davis:

This is to inform you of our decisions on changes to the Standard Technical Specification (STS) NUREGs proposed by the NEI Technical Specification Task Force (TSTF). Those travelers Approved are TSTFs -212, R.1; -266, R.3; -324, R.1; -327; -338; and -339. Please note that TSTF-051, R.1 is Modified. Comments on TSTF-051, R.1 are enclosed.

For your information, the following travelers are pending evaluation by a technical branch: TSTFs -207, R.3 (SPLB); -226 (SRXB); -264 (SRXB); -295 (EICB); -296 (SRXB); -297 (SPLB); -306 (EICB); -313 (MCEB); -332 (EICB); -334 (SPLB & SPSB); -335 (SPLB); -336 (SPLB); -337 (SRXB); -344 (SRXB); -345 (SRXB); and -350 (SRXB).

Please contact me at (301) 415-1161 or e-mail wdb@nrc.gov, if you have any questions or need further information.

Sincerely,

Original Signed By

William D. Beckner, Chief  
Technical Specifications Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Project No. 689  
Enclosures: As stated

cc: N. Clarkson, BWOG  
H. Pontious, BWROG  
T. Weber, CEOG  
D. Buschbaum, WOG  
D. Hoffman, EXCEL

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Please contact me at (301) 415-1161 or e-mail [wdb@nrc.gov](mailto:wdb@nrc.gov), if you have any questions or need further information.

Sincerely,

A handwritten signature in cursive script, reading "William D. Beckner".

William D. Beckner, Chief  
Technical Specifications Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

Project No. 689  
Enclosures: As stated

cc: N. Clarkson, BWOG  
H. Portious, BWROG  
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## DISPOSITION SUMMARY

### TSTF-051, R.1: Modify

The staff has reviewed TSTF-051, R.1, and has the following comments:

1. The BWO (NUREG-1430) portion of TSTF-051, R.1 contains a markup of STS 3.4.6 "Refueling Canal Water Level" and its associated Bases. NUREG-1431 (WOG) and NUREG-1432 (CEOG) contain similar specifications--WOG STS 3.9.7 "Refueling Cavity Water Level" and CEOG STS 3.4.6 "Refueling Water Level". The WOG and CEOG portions of TSTF-051, R.1 do not contain markups of these specifications and their associated Bases. No justification is provided as to why the WOG and CEOG markups differ from the BWO markup with regards to these similar specifications. The TSTF should either provide markups of WOG STS 3.4.7, CEOG STS 3.4.6, and their associated Bases, or provide a justification as to why they should be different.
2. The BWR/6 markup of page B 3.6-93 shows the addition of Insert F. The BWR/6 insert pages do not contain an Insert F. Based on the BWR/4 markup of the same specification, the staff concludes that Insert F should be the "Reviewer's Note" (see attached pages).
3. Based on a comparison of the BWR/4 and BWR/6 markups, the staff concludes that an insert was omitted from the BWR/6 markups. Insert O should be included as shown on the mark-up of BWR/6 page B 3.6-93 (see attached pages).
4. There is one editorial change. On BWR/6 markup of page B 3.7-22, the change to Required Action E.1, E.2 and E.3 to add "[required]" should be "[recently]".
5. Substitute "X" for "72" hours minimum decay time in the APPLICABLE SAFETY ANALYSIS of section B3.9.6 for BWO STS and "recently" for "required" irradiated fuel assemblies in the ACTIONS E.1 and E.2 of section B3.7.4 for BWR/6 STS.



## STAFF COMMENTS

BWR / 6

Insert F

### REVIEWER'S NOTE

The addition of the term "recently" associated with handling irradiated fuel in all of the containment function Technical Specification requirements is only applicable to those licensees who have demonstrated by analysis that after sufficient radioactive decay has occurred, off-site doses resulting from a fuel handling accident remain below the Standard Review Plan limits (well within 10CFR100).

Additionally, licensees adding the term "recently" must make the following commitment which is consistent with draft NUMARC 93-01, Revision 3, Section 11.2.6 "Safety Assessment for Removal of Equipment from Service During Shutdown Conditions", subheading "Containment - Primary (PWR)/Secondary(BWR)".

"The following guidelines are included in the assessment of systems removed from service during movement of irradiated fuel:

- During fuel handling/core alterations, ventilation system and radiation monitor availability (as defined in NUMARC 91-06) should be assessed, with respect to filtration and monitoring of releases from the fuel. Following shutdown, radioactivity in the fuel decays away fairly rapidly. The basis of the Technical Specification operability amendment is the reduction in doses due to such decay. The goal of maintaining ventilation system and radiation monitor availability is to reduce doses even further below that provided by the natural decay.
- A single normal or contingency method to promptly close primary or secondary containment penetrations should be developed. Such prompt methods need not completely block the penetration or be capable of resisting pressure.

The purpose of the "prompt methods" mentioned above are to enable ventilation systems to draw the release from a postulated fuel handling accident in the proper direction such that it can be treated and monitored."

Insert Q

[Due to radioactive decay, secondary containment is only required to be OPERABLE during fuel handling involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days).]

STAFF  
COMMENTS

[Secondary Containment]  
B 3.6.4.1

TSTF-51, Rev. 1

BASES

APPLICABLE  
SAFETY ANALYSES  
(continued)

and that fission products entrapped within the [secondary containment] structure will be treated by the SGT System prior to discharge to the environment.

[Secondary containment] satisfies Criterion 3 of the NRC Policy Statement.

LCO

An OPERABLE [secondary containment] provides a control volume into which fission products that bypass or leak from primary containment, or are released from the reactor coolant pressure boundary components located in [secondary containment], can be diluted and processed prior to release to the environment. For the [secondary containment] to be considered OPERABLE, it must have adequate leak tightness to ensure that the required vacuum can be established and maintained.

APPLICABILITY

In MODES 1, 2, and 3, a LOCA could lead to a fission product release to primary containment that leaks to [secondary containment]. Therefore, [secondary containment] OPERABILITY is required during the same operating conditions that require primary containment OPERABILITY.

In MODES 4 and 5, the probability and consequences of the LOCA are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining [secondary containment] OPERABLE is not required in MODE 4 or 5 to ensure a control volume, except for other situations for which significant releases of radioactive material can be postulated, such as during operations with a potential for draining the reactor vessel (OPDRVs) ~~during CORE ALTERATIONS~~ or during movement of irradiated fuel assemblies in the [primary or secondary containment].

[recently]

Insert  
F

INSERT  
C

ACTIONS

A.1

If [secondary containment] is inoperable, it must be restored to OPERABLE status within 4 hours. The 4 hour Completion Time provides a period of time to correct the problem that is commensurate with the importance of

(continued)



BASES

TSTF-51, Rev. 1

## ACTIONS

C.1, C.2.1, C.2.2, and C.2.3 (continued)

This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action C.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, ~~CORE ALTERATIONS~~ and movement of irradiated fuel assemblies in the [primary and secondary containment] must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended. [recently]

D.1

If both [control room AC] subsystems are inoperable in MODE 1, 2, or 3, the [Control Room AC] System may not be capable of performing the intended function. Therefore, LCO 3.0.3 must be entered immediately.

RECENTLY

E.1, E.2, and E.3

The Required Actions of Condition E.1 are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown. [Required]

During movement of irradiated fuel assemblies in the [primary or secondary containment] ~~during CORE ALTERATIONS~~ or during OPDRVs with two [control room AC] subsystems inoperable, action must be taken to immediately suspend activities that present a potential for releasing

(continued)

## TECHNICAL BRANCH NAMES AND ACRONYMS

### Division of Engineering (DE)

Materials and Chemical Engineering Branch (EMCB)  
Mechanical and Civil Engineering Branch (MCEB)  
Electrical and Instrumentation Controls Branch (EICB)

### Division of Systems Safety and Analysis (DSSA)

Plant Systems Branch (SPLB)  
Reactor Systems Branch (SRXB)  
Probabilistic Safety Assessment Branch (SPSB)