January 28, 1983

MEMORANDUM FOR: D. G. Eisenhut, Director, Division of Licensing

FROM: C. E. Norelius, Director, Division of Project and Resident Programs

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE - CLARIFICATION OF LA SALLE 1 TECHNICAL SPECIFICATION 3.8.1.2, ACTION a

The number of "and/or" provisions in Technical Specification 3.8.1.2, Action a, makes it difficult to determine what is required by the action statement. A literal reading, to the best of our ability, tells us that with either (1) all offsite circuits inoperable, or (2) diesel generator 0, or (3) diesel generator 1A, or (4) any combination of (1), (2), and (3), core alterations and handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel must be suspended. Discussions with members of your staff indicate that that was not the intent of Technical Specification 3.8.1.2, Action a. They indicate that the intent was to allow either diesel generator 0 or 1A to be taken out of service (made inoperable) without suspending activities if the loads on the diesel generator to be taken out of service are not needed. We understand that position and believe it to be sound.

Since there is a significant difference between the intent and the literal meaning of Technical Specification 3.8.1.2, Action a, as we understand them, we request you encourage the licensee to submit a proposed change to correct the difference as part of the licensee's next planned technical specification change submittal. Rather than revising Technical Specification 3.8.1.2, Action a, you might give consideration to making Technical Specification 3.0.5 applicable in operational conditions 1 through 5 and * and eliminating in its entirety Technical Specification 3.8.1.2. In the interim, we request that you confirm to us your understanding of the intent of the action statement. We would appreciate a response from you by [redacted]

C. E. Norelius, Director
Division of Project and
Resident Programs

cc: R. Wessman, NRR



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

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MEMORANDUM FOR: D. G. Eisenhut, Director, Division of Licensing, NRR

FROM: C. E. Norelius, Director, Division of Project and Resident Programs

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE - NRR POSITION ON WHEN AN ACTION STATEMENT IS ENTERED AS A CONSEQUENCE OF FAILURE TO PERFORM SURVEILLANCE TESTS

Licensees occasionally fail to perform technical specification surveillance tests as a result of oversight, scheduling errors, and inadequate test procedures. Standard Technical Specification 4.0.3 clearly indicates that failure to perform surveillance tests renders the surveilled items inoperable and requires invocation of the applicable action statements. Although custom technical specification plants and older STS plants do not generally have statements similar to STS 4.0.3, all licensees are aware of and comply with STS 4.0.3. However, licensee opinions differ as to when action statements are entered when surveillance tests are not performed - most take the position that action statements are entered at the time tests should have been performed but some take the position that action statements are entered at the time it is discovered that tests were not performed. We agree with the former position - the latter position effectively lengthens the technical specification allowed surveillance period when missed tests are not discovered due to program inadequacies or personnel error.

To enable us to assure licensees are uniformly dealing with this matter in a manner consistent with NRC policy, we request NRR provide us with a position on when action statements are entered when surveillance tests are not performed. We would appreciate a response by March 1, 1983.

C. E. Norelius

C. E. Norelius, Director
Division of Project and
Resident Programs

cc: R. Wessman, NRR

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Jackie Lopez for Doug
Of Fuller/ Task Spec Interpretation

UNITED STATES
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REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

FEB 9 1983

MEMORANDUM FOR: D. G. Eisenhut, Director, Division of Licensing, NRR

FROM: C. E. Norelius, Director, Division of Project and Resident Programs

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE - NRR POSITION ON SHUTDOWN TIME ALLOWANCES WHEN AN LCO IS NOT MET

When operation is less conservative than an LCO, Technical Specifications allow a period of time to correct the condition and then provide times within which specified descending levels of plant shutdown conditions (lower operational modes) must be attained. Occasionally, the plants will choose to enter a lower mode without using the full time allowed in the preceding mode(s). In such cases, it is not clear if licensee's can take credit for the unused portion of the full time allowance in the preceding mode to determine the time allowed before the next descending mode must be attained; however, it seems clear that in no case can credit be taken for allowable times in modes above the mode in which the problem was discovered.

The following examples will clarify the issue:

Example 1

The action statement for B&W STS 3.6.2.1 states: "With one containment spray system inoperable, restore the inoperable spray system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the inoperable spray system to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours".

If the licensee discovered a containment spray system inoperable when in the power operations mode and attained the hot standby condition within 2 hours of discovery, does the licensee have a maximum of 154 hours (72-2=70 plus 6 plus 48 plus 30) after attaining hot standby before cold shutdown must be attained? Or does the licensee have a maximum of 78 hours (48 plus 30)? In cases like this, we believe the licensee should have 154 hours.

Example 2

If the licensee discovered the above problem when in the hot standby mode,

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does the licensee have a maximum of 78 hours (48 plus 30) before cold shutdown must be attained? Or does the licensee have a maximum of 156 hours (72 plus 6 plus 48 plus 30)? In cases like this, we believe the licensee should only have 78 hours.

To enable us to assure that licensee's are uniformly dealing with this matter in a manner consistent with NRC policy, we request NRR provide us with a position on licensee's adding unused portions of allowable time to get to the next lower descending shutdown condition. We would appreciate a response by March 15, 1983.

C. E. Norelius

C. E. Norelius, Director
Division of Project and
Resident Programs

cc:
W. G. Guldemond, SRI,
LaSalle Station

6910

FEB 16 1983

MEMORANDUM FOR: D. G. Eisenhut, Director, Division of Licensing, NRR

FROM: C. E. Norelius, Director, Division of Project and Resident Programs

SUBJECT: REQUEST FOR TECHNICAL ASSISTANCE - TECHNICAL SPECIFICATION INTERPRETATION (AITS F03008283)

Attached is a memorandum from one of our Senior Resident Inspectors requesting a Technical Specification interpretation by NRR regarding the subject of operability. The purpose of my memorandum is to request that interpretation.

In your letter dated April 10, 1980, to "All Power Reactors", all licensees were requested to submit Technical Specification changes to change the definition of operable to read: "A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s)".

The definition of operable was further clarified as follows: "When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and devices(s) are OPERABLE, or likewise satisfy the requirements of this specification". (Emphasis added)

It is very clear from the above that system, subsystem, train, component or device is not inoperable for the purpose of satisfying the requirements of its LCO if the system, subsystem, etc., has merely lost its emergency power source. However, it is not clear to us whether the loss of emergency power to a system, subsystem, etc., would render that system, subsystem, etc., inoperable for the purpose of satisfying another system, subsystem, etc., LCO.

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NRC FORM 318 (10-80) NRCM 0240 OFFICIAL RECORD COPY USGPO 1981—335-960

The attached memorandum addresses this specific example: With the Core Spray System degraded by loss of its emergency power source, is the Core Spray System to be considered operable to meet the High Pressure Coolant Injection System LCO?

We would appreciate a review of this issue by your staff and a response by April 15, 1983. Please contact Roger Walker of my staff on FTS 384-2565 if you have any questions regarding this matter.

C. E. Norelius, Director
Division of Project and
Resident Programs

Attachment: As stated

cc: N. J. Chrissotimos, SRI
Quad Cities Station

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UNITED STATES
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GLEN ELLYN, ILLINOIS 60137

October 15, 1982

MEMORANDUM FOR: R. D. Walker, Chief, Reactor Projects Section 2C

FROM: N. J. Chrissotimos, Senior Resident Inspector, Quad-Cities Nuclear Power Station

SUBJECT: TECHNICAL SPECIFICATION INTERPRETATION

Recently I have been involved with a response to an Iowa Electric Light and Power Company's denial of a noncompliance involving operability of an emergency system.

In responding to the denial, it appears that Technical Specification requirements allow unit operation to continue for seven days with two emergency systems concurrently inoperable.

Specifically, (a) when a diesel generator is inoperable, continued reactor operation is permissible for seven days provided that all of the low pressure core and containment cooling subsystems and the remaining diesel generator are operable. If this requirement cannot be met, an orderly shutdown shall be initiated and the reactor be placed in cold shutdown within 24 hours. (Duane Arnold Technical Specification 3.5.6.1)

(b) When the high pressure coolant injection (HPCI) system is inoperable, reactor operation is permissible for seven days provided that all active components of the ADS subsystem - the RCIC system, the LPCI subsystem and both core spray subsystems - are operable. If this requirement is not met, the same 24 hour shutdown requirement is applied. (Technical Specification 3.5.D.2)

The situation was that the diesel generator was unknowingly inoperable for 17 days and within this time frame, HPCI was also inoperable for approximately 33 hours. The licensee was cited for violating the 24 hour LCO because it was felt that the equipment powered by the inoperable diesel generator (core spray, LPCI subsystem) was also considered to be inoperable and thus the HPCI LCO was violated.

The licensee believed that the inoperability of diesel generator 1G-21 did not render the B core spray subsystem inoperable for purposes of the seven day LCO in effect based on the following:

Under Amendment 77, the definition of OPERABLE is clarified to read: A system, subsystem, train, component or device shall be OPERABLE or have

OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

Amendment 77 also clarified the definition of Limiting Condition for Operation as follows: When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. (emphasis added)

Thus, under the foregoing interpretation of Technical Specification 3.5.D.2 on March 5-6, 1982, the B core spray subsystem was OPERABLE for the purpose of satisfying the then applicable seven day Limiting Condition for Operation because its normal power source was operable and its redundant subsystem (Core Spray Subsystem A) was OPERABLE.

Since the B core spray subsystem was not inoperable for the purposes of Technical Specification 3.5.D.2, this Technical Specification was not violated.

By interpreting the specifications in this manner, we would be allowing a licensee to operate for seven days with both a HPCI system and diesel generator inoperable. It should be realized that in this situation, under an accident condition with loss of offsite power, there would only be the minimal ECCS systems available to cope with the accident. (One core spray pump and two LPCI pumps would not have power.)

When considering both the HPCI and diesel generator LCO's together, it is difficult for me to interpret that the core spray and LPCI pumps associated with the inoperable diesel can be considered operable to satisfy the HPCI LCO.

I am requesting a position from the Office of Nuclear Reactor Regulation on the applicability of the definition of operable with respect to this matter.

Although this is a specific problem, it may also apply to other BWR's which do not have standard Technical Specifications and thus should be looked at generically.

N. J. Chrissotimos

N. J. Chrissotimos
Senior Resident Inspector
Quad-Cities Nuclear Power Station

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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MEMORANDUM FOR: Charles E. Norelius, Director
Division of Project and Resident Programs
Region III

FROM: Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

SUBJECT: NRR POSITION ON WHEN AN ACTION STATEMENT IS ENTERED AS A CONSEQUENCE OF FAILURE TO PERFORM SURVEILLANCE TESTS

REFERENCE: Memo from C.E. Norelius to D.G. Eisenhut, dated January 31, 1983, subject: "Request for Technical Assistance - NRR Position on When an Action Statement is Entered as a Consequence of Failure to Perform Surveillance Tests".

The referenced memorandum requests NRR's position on when an Action Statement is entered as a consequence of failure to perform required surveillance tests.

It is our position that Action Statements are entered when items required operable by Limiting Condition for Operations are known to be inoperable. Items may be determined inoperable (1) during use, (2) during a surveillance test, or (3) in accordance with Standard Technical Specification 4.0.3 which provides that items are inoperable when Surveillance Requirements are not performed within the specified time intervals (after applying the allowable tolerance). Therefore, we agree with your position that Action Statements are entered when the Surveillance Requirements should have been performed rather than at the time it is discovered that tests were not performed.

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

cc: Director, Division of Project
and Resident Programs
Region I
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Region V
J. G. Partlow, I&E

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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MEMORANDUM FOR: Charles E. Norelius, Director
Division of Project and Resident Programs
Region III

FROM: Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

SUBJECT: CLARIFICATION OF LA SALLE 1 TECHNICAL SPECIFICATION 3.8.1.2, ACTION a

Your memorandum of January 28, 1983 requested confirmation of the intent of LaSalle-Unit 1 Specification 3.8.1.2, Action a. The definition of Operable-Operability in the LaSalle Technical Specifications requires that whenever required power source is inoperable, the equipment supplied by the inoperable power source also be declared inoperable. Exceptions to this requirement (Spec 3.0.5) are provided for certain special conditions in Operational Conditions 1, 2 and 3.

The intent of Specification 3.8.1.2 is to ensure that each system and component required to be operable in Operational Condition 4, 5 or * (when handling irradiated fuel in the secondary containment) is capable of being supplied from two independent sources of AC power -- the off-site transmission network and an emergency diesel generator. Since it is possible, even likely, that the systems and components selected by the licensee to be operable to satisfy the Technical Specification requirements will not all be capable of being powered from the same two independent sources of AC power, it is necessary to write the specification to be flexible enough to require the operability of the electrical power sources from which the systems and components selected to meet these Technical Specification requirements can be powered. Therefore, we believe that the term "and/or" should be retained to provide for those situations in which more than one pair of independent power sources are required to supply systems and components not capable of being supplied by the same pair of independent power sources.

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This memorandum also confirms previous discussions between members of our staffs regarding operability requirements for diesel generators 0 or 1A during core alterations and handling of irradiated fuel in the secondary containment or operations with a potential for draining the reactor vessel. One of these diesel generators may be out of service without entering the Action Statement if the loads on this diesel generator are not required to be operable. The required loads would be supplied by two independent power sources, an offsite source and the other diesel generator.

Based on the foregoing we do not intend to revise Technical Specification 3.8.1.2, Action a. Please contact D. Hoffman (FTS 492-8518) if you have further questions.

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

cc: T. Bournia
A. Schwencer

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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MEMORANDUM FOR: Charles E. Norelius, Director
Division of Project and Resident Programs
Region III

FROM: Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

SUBJECT: NRR POSITION ON SHUTDOWN TIME ALLOWANCES WHEN AN LCO IS NOT MET

REFERENCE: Memo from C. E. Norelius to D. G. Eisenhut dated February 9, 1983, subject: "Request for Technical Assistance - NRR Position on Shutdown Time Allowances When an LCO Is Not Met"

From: Roger D. Walker

To: Resident Inspector's Office
____ Dresden
____ Duane Arnold
____ LaSalle County
____ Monticello
✓ Quad Cities

The referenced memorandum requests NRR's position on licensees reducing plant operational modes prior to the expiration of the allowable out-of-service times specified in technical specification Action Statements and then being permitted to utilize the unused portion of the higher mode allowable out-of-service time to extend the allowable time in a lower operational mode.

It is our position that it is acceptable for a licensee to initiate and complete a reduction in operational modes in a shorter time interval than required by the allowable out-of-service time specified in an Action Statement and then to add the unused portion of this allowable out-of-service time to that provided for operation in a lower operational mode. Furthermore, it is our position that a stated allowable out-of-service time (frequently 72 hours or 7 days) should be applicable regardless of the operational mode in which the inoperability is discovered. However, the times provided for achieving a reduction in operational modes (e.g., generally 6 hours from Modes 1 or 2 to Mode 3, and 6 hours from Mode 3 to Mode 4) should not be applicable if the inoperability is discovered in a lower operation mode.

The following examples are provided to clarify our positions:

Example 1

B&W STS 3.6.2.1 requires two independent containment spray systems OPERABLE in MODES 1, 2, 3 and 4. The Action Statement for this LCO states: "With one containment spray system inoperable, restore the inoperable spray system to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the inoperable spray system to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours".

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This Action Statement provides up to 156 (72+6+48+30) hours to achieve COLD SHUTDOWN if a containment spray system is discovered inoperable while in POWER OPERATION (MODE 1) or STARTUP (MODE 2). If the licensee discovered an inoperable containment spray system while in Mode 1 and attained HOT STANDBY within 16 hours, the licensee would have 140 (72+6-16+48+30) hours before being required to attain COLD SHUTDOWN (MODE 5).

Example 2

If the licensee discovered the containment spray system inoperable while in HOT STANDBY (MODE 3), the 6 hour interval provided for achieving HOT STANDBY could not be added to the 72 hour, 48 hour and 30 hour intervals to provide additional stay time in HOT STANDBY. Therefore, the licensee would be required to attain COLD SHUTDOWN within 150 (72+48+30) hours.

Example 3

If the licensee discovered the containment spray system inoperable while in HOT SHUTDOWN (MODE 4) neither the 6 hour interval, nor the 48 hour interval could be added to the 72 hour and 30 hour intervals to provide additional time for achieving COLD SHUTDOWN. Therefore, the licensee would be required to attain COLD SHUTDOWN within 102 (72+30) hours.

Our positions are predicated on our belief that safety is enhanced by minimizing plant transients associated with changing operational modes. It is for this reason that we have provided allowable out-of-service times in all Standard Technical Specification Action Statements and it is our intention that the specified allowable out-of-service times be applicable in whatever operational mode the inoperability is discovered.

We plan to revise the Bases sections of the Standard Technical Specifications to clarify our position on this matter during future revisions to those documents.

for Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

ccs: Director, Division of Project
and Resident Programs
Region I
Region II
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Region V
J. G. Partlow, I&E