

August 17, 1998

Mr. James Davis
Nuclear Energy Institute
1776 Eye Street, N. W.
Suite 300
Washington, DC 20006-2496

Dear Mr. Davis:

This is to inform you that disposition has been made on three proposed changes to the Standard Technical Specification (STS) NUREGs made by the NEI Technical Specification Task Force (TSTF). The disposition for TSTFs 111, R.1 and -245 is modify. Those recommended for rejection are TSTFs-217 and -277; please see the enclosure for NRC comments with regard to these TSTFs. Upon your request prior to the next joint NRC/TSTF Owner's Group meeting, NRC staff will be available to discuss their recommendations during the next meeting.

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

Sincerely,

Original Signed By

William D. Beckner, Chief
Technical Specifications Branch
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: N. Clarkson, BWO
D. Wuokko, BWO
B. Ford, BWROG
J. Volkoff, CEOG
D. Bushbaum, WOG
D. Hoffman, EXCEL

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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0901

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Sincerely,

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

William D. Beckner, Chief
Technical Specifications Branch
Associate Director for Projects
Office of Nuclear Reactor Regulation

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cc: N. Clarkson, BWOG
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DISPOSITION SUMMARY

ISTF-111, R.1: Modify

Recommend modification with additional inserts as follows:

Revise 1.1 ESF Response Time

In the last sentence of the paragraph, retain "measured" and insert "or" before "verified by means..." and replace "measured" at the end of the last sentence with "determined" so that the entire sentence reads: "The response time may be measured or verified by means of any series of sequential overlapping, or total steps so that the entire response time is determined."

Insert the following at the end of the paragraph: "The response time of each step must be specifically measured, except in those cases specified in the surveillance requirement where a verification of the response time, through some other surveillance requirement, is performed in accordance with a plant specific NRC approved alternative."

Revise 1.1 RTS Response Time

Same comment as ESF Response Time, above.

Modify Insert 1 for SR 3.3.1.16 and Insert 3 for SR 3.3.2.10 as follows:

Place following Reviewer's Note before Insert 1 for SR 3.3.1.16 and Insert 3 for SR 3.3.2.10 as follows: "[Reviewer's Note: The following Bases are applicable for plants adopting WCAP-13632-P-A.]"

Revise Insert 1 for SR 3.3.1.16 and Insert 3 for SR 3.3.2.10 to read: "In some instances, response time may be verified either by actual response time tests in any series of sequential, overlapping or total channel measurements, or by the summation of allocated sensor response times with actual response time tests on the remainder of the channel. These instances are specifically listed in the surveillance requirement. Allocations for sensor response times may be obtained from: (1) historical records based on acceptable response time tests (hydraulic, noise, or power interrupt tests), (2) inplace, onsite, or offsite (e.g., vendor) test measurements, or (3) utilizing vendor engineering specifications. WCAP-13632-P-A, Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirement," dated January 1996, provides the basis and methodology for using allocated sensor response times in the overall verification of the channel response time for specific sensors identified in the WCAP. Response time verification for other sensor types must be demonstrated by test. The allocations for sensor response times must be verified prior to placing the component in operational service and re-verified following maintenance that may adversely affect response time. If the allocation is from prior measurement data, and not from the vendor design data, that allocation must be a statistically valid value by using the mean value of the measurements and a 2 sigma standard deviation value of the measured response times to determine the one or two sided tolerance limit factor for a normal distribution for a 95/95% confidence level. NUREG-1475, Table T-11a or T-11b may be used."

Add the following new Insert after the last paragraph of SR 3.3.1.16 and SR 3.3.2.10 as follows: "[Reviewer's Note: The following Bases apply if SR 3.3.1.16 is modified by a Note specifying sensors exempt from specific response time testing.]"

"This Surveillance Requirement is also modified by an additional note specifying which sensors are exempt from specific response time test, and who's response time may be verified through some other surveillance requirement, as performed in accordance with an NRC approved plant specific alternative."

Revise Insert 2 for SR 3.3.1.16 and Insert 4 for SR 3.3.2.10 to add new Reference as follows: "10. NUREG-1475."

TSTF-245: Modify

Modification recommend as follows:

1. Add new paragraph to WOG Bases LCO B 3.7.5, before the last paragraph on page B 3.7-26, as follows: "Since the AFW system may be used during startup, normal shutdown, hot standby operations, and hot shutdown operations, and that it is controlled and operated during these conditions in the manual mode of operation, the AFW system is considered OPERABLE since the system is already operating and the autostart function is not required."
2. Because all PWRs have similar designs in this area and the Bases are virtually identical in that they state the AFW may be used during normal startup and shutdown, TSTF applies to all PWR STS.
3. The concern of the TSTF is defining AFW OPERABILITY. The improved STS defines or delineates system OPERABILITY in the LCO portion of the Bases, not in individual SRs. The staff has stated in the attachments to the TSTF that the AFW System is a dual use system. Therefore, manual operation of the AFW should be defined in the LCO Bases rather than as Notes in the SRs. The staff recommends that the LCO Bases be revised as shown on the marked-up pages, attached to the traveler package, and that the OG changes be deleted.
4. The Note in SR 3.7.5.3 and Note 2 in SR 3.7.5.4 should remain. Since the AFW System is used for startup from MODES 5 and 6, SR 3.0.4 would prevent or halt a startup if SRs 3.7.5.3 and 3.7.5.4 were not performed prior to entering the APPLICABILITY of "MODE 4 when steam generator is used for heat removal" which may not occur until well into MODE 4. The Note allows the startup to proceed in MODE 4 until the AFW System is taken off line and replaced by the Main Feedwater System.

TSTF-217: Recommend Reject

It is not clear that the current improved STS is not adequate. Of the 7 B&W plants, Crystal River implemented the standard, Oconee (3 units) is taking an approach other than the

TSTF, and TMI does not intend to convert. With only 2 remaining units, a generic change does not seem appropriate.

ISTF-277: Recommend Reject

The proposed change would split the existing SR into two different SRs in order to remove the NOTE from the Frequency column. The current format of the SR is in accordance with the improved STS format and style guide. The current SR note is not ambiguous.