

March 25, 1986

Enclosure 4

MEMORANDUM FOR: George Rivenbark, Senior Project Manager
BWR Project Directorate #2
Division of BWR Licensing, NRR

FROM: Edward J. Butcher, Chief
Technical Specifications Coordination Branch
Division of Human Factors Technology, NRR

SUBJECT: PROPOSED TECHNICAL SPECIFICATION CHANGES -
HATCH UNIT 1

By letter dated March 3, 1986 (SL-226, 0261C), Georgia Power proposed to delete Table 7.3-1, "Primary Containment Isolation Valves" from the Hatch Technical Specification. In addition it was proposed to include a revision of Specification 3.7.D.1 to note that the applicable valves will be identified in plant procedures to replace the reference to the deleted table. Also Specification 4.7.D.1.a was revised to note that the surveillance testing includes verification of valve closure times (that was specified in Table 3.7-1).

The removal of component lists from Technical Specifications have been proposed as a generic change to the STS by AIF and Vendor Owners Groups. TSCB is in the process of developing generic guidelines for implementing this recommendation and updating the STS. One of the major considerations in this process is the development of suitable controls for changes to the documents that identify the components that are no longer identified by tables in the TSs. Although this effort has not been completed at this time, the following recommendations with regard to the Hatch proposed TS changes are provided.

1. As noted in the licensee's proposal, the list of valves and closure time requirements are identified in a table in the Hatch Unit 1 updated FSAR. Therefore, changes to this information is subject to the change controls of 50.59. It is recommended that the Bases of subject specifications be revised to reference the applicable FSAR tables on valves and note that these valves, including their closure times, are those for which the specification requirements apply.
2. It is recommended that the added reference proposed for Specification 3.7.D.1, that the applicable valves will be identified in plant procedures, be deleted. The LCO statement that all primary containment isolation valves shall be operable is sufficient since the Bases for this specification will include, as recommended in 1 above, a reference to the Updated FSAR that identifies the specific valves included. Also

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from a practical standpoint, many LCOs and most surveillance requirements use procedures to define specific actions required to be carried out to conform to TS requirements. The TS need not include a reference to such procedures or the details of what will be included therein (e.g., identification of the valves to which the TS requirements apply).

With the above changes, the Updated FSAR provides the identification of primary containment isolation valves and their closure times as applicable to the subject TS LCO and surveillance requirements. Changes to this document are subject to the controls of 50.59 and are periodically submitted to NRC in accordance with the FSAR update rule, 50.71.

Please advise if you have any questions with regard to these recommendations.

Original Signed By:

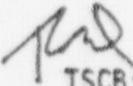
Edward J. Butcher

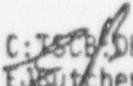
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