



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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*General Directions: This model SE provides the format for an SE of LARs to adopt traveler TSTF-592. TSTF-592 was approved as part of the CLIIP. This model SE can also be used as a template for LARs adopting TSTF-592 that have significant variations and are not using the CLIIP. The **[bolded bracketed]** information shows text that should be filled in for the specific amendment. The italicized wording provides guidance on what should be included in each section.*

FINAL MODEL SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR
 REGULATION RELATED TO TSTF-592, "REVISE AUTOMATIC DEPRESSURIZATION
 SYSTEM (ADS) INSTRUMENTATION REQUIREMENTS"
 AMENDMENT NO. **[XXX]** TO FACILITY OPERATING LICENSE NO. **[XXX-XX]**
 AND AMENDMENT NO. **[XXX]** TO FACILITY OPERATING LICENSE NO. **[XXX-XX]**
[NAME OF LICENSEE]
[NAME OF FACILITY]
 DOCKET NOS. 50-**[XXX]** AND 50-**[XXX]**

<u>Application (i.e., initial and supplements)</u> <ul style="list-style-type: none"> • [Date], [ADAMS Accession No.] 	<u>Safety Evaluation Date</u> [Date]
	<u>Principal Contributors to Safety Evaluation</u> <ul style="list-style-type: none"> • [Clint Ashley]

1.0 PROPOSED CHANGES

[Name of licensee] (the licensee) requested changes to the technical specifications (TSs) for **[name of facility]** by license amendment request (LAR, application). In its application, the licensee requested that the U.S. Nuclear Regulatory Commission (NRC, the Commission) process the proposed amendment under the Consolidated Line Item Improvement Process (CLIIP). The proposed changes would revise the TS based on Technical Specifications Task Force (TSTF) Traveler TSTF-592, Revision 2, "Revise Automatic Depressurization System (ADS) Instrumentation Requirements" (TSTF-592) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23256A352), correction letter (ML23283A002), and the associated NRC staff safety evaluation (SE) of Traveler TSTF-592 (ML24029A148).

The proposed changes would revise the "Emergency Core Cooling System (ECCS) Instrumentation," TS Actions related to ADS instrumentation monitoring channels.

System Description

The purpose of the ECCS instrumentation is to initiate appropriate responses from systems to ensure that the fuel is adequately cooled in the event of a design basis accident or transient. The ECCS uses two independent methods (flooding and spraying) to cool the core during a loss-of-coolant accident (LOCA).

The low-pressure ECCS subsystems are designed to mitigate a large break LOCA where reactor vessel pressure rapidly decreases to the point at which the low-pressure ECCS pumps can inject water. There are two redundant divisions for each of the low-pressure ECCS subsystems.

The high-pressure ECCS subsystem is designed to mitigate small break LOCAs during which reactor vessel pressure remains higher than the ability of the low-pressure ECCS pumps to inject water. There is a single high-pressure ECCS subsystem.

The ADS provides redundancy for the single high-pressure ECCS subsystem. In the event of a failure of the high-pressure ECCS subsystem, the ADS valves open to release reactor vessel pressure to the suppression pool, rapidly reducing the pressure to the point at which a low-pressure ECCS subsystem can inject water.

The ECCS instrumentation associated with ADS initiation uses sensor information such as reactor vessel water level, drywell pressure, and low-pressure pump discharge pressure, as well as timers (time delays) to automatically initiate ADS.

1.1 Proposed TS Changes to Adopt TSTF-592

{NOTE: Be sure to verify the nomenclature and numbering are accurate for the plant and revise as needed.}

{NOTE: There are boiling water reactor (BWR) plants with an ADS initiation design that varies from the design assumed in the STS. The effect of these variations and applicability of the traveler will need to be evaluated on a plant-specific basis.}

In accordance with the NRC staff-approved TSTF-592, the licensee proposed changes that would revise TS 3.3.5.1, "ECCS Instrumentation". Specifically, the licensee proposed the following changes to adopt TSTF-592:

1.1.1 Proposed Changes to TS 3.3.5.1, "ECCS Instrumentation"

- TS Table 3.3.5.1-1 is revised to reference Condition H instead of Condition G for Functions 4.e, 4.f, 4.h, 5.e, **[5.f, and 5.h][and 5.g]**.
- TS 3.3.5.1, Required Action G.1, is revised to delete the Note.
- TS 3.3.5.1 is revised to add a new Condition H and associated remedial actions.
 - Condition H states, "As required by Required Action A.1 and referenced in Table 3.3.5.1-1."

- Required Action H.1 states, “Declare ADS valves inoperable,” and is modified by two Notes. The first Note limits the Required Action applicability to Functions 4.e, 4.f, **[5.e, and 5.f][and 5.e]**. The second Note limits the Required Action applicability to when both ADS trip systems are inoperable due to **[Core Spray][LPCS]**/LPCI Pump Discharge Pressure - High channels being inoperable. The Completion Time is “1 hour from discovery of loss of ADS initiation capability in both trip systems.”
- Required Action H.2 states, “Restore affected channels to OPERABLE status,” and it is modified by two Notes. The first Note limits the Required Actions applicability to Functions 4.e, 4.f, **[5.e, and 5.f][and 5.e]**. The second Note limits the Required Actions applicability to when one ADS trip system is inoperable due to **[Core Spray][LPCS]**/LPCI Pump Discharge Pressure – High channels being inoperable. The Completion Time is 96 hours from discovery of inoperable channels concurrent with **[HPCI][HPCS]** or RCIC [reactor core isolation cooling] inoperable, and 8 days from discovery of inoperable channels. The option of including a Risk Informed Completion Time alternative is included.
- Required Action H.3 states, “Restore channel to OPERABLE status,” with a Completion Time of “30 days.”
- TS 3.3.5.1 current Action H is renamed Action I, and is modified to include the new Condition H.

1.1.2 Proposed Editorial Changes to the Presentation of Risk Informed Completion Times.

The presentation of Risk Informed Completion Times (RICT) applicable to Completion Times that state “from discovery” is revised as follows to provide consistency and clarity, without changing the intent of the TS.

{NOTE: Not all licensees will have these changes, mostly just plants with TS based on NUREG-1433, use this option. Be sure to verify the nomenclature and numbering are accurate for the plant and revise as needed.}

TS 3.3.5.1, Required Action **[F.2 and G.2]** Completion Time currently states (in part):

- 96 hours from discovery of inoperable channel concurrent with HPCI or **[reactor core isolation cooling (RCIC)][RCIC]** inoperable

[OR

In accordance with the Risk Informed Completion Time Program]

The Completion Time is revised to state:

- 96 hours **[or in accordance with the Risk Informed Completion Time Program]** from discovery of inoperable channel concurrent with HPCI or **[reactor core isolation cooling (RCIC) inoperable][RCIC]**.

{NOTE Not all licensees will have this change, mostly just plants with TS based on NUREG-1434, use this option. Be sure to verify the nomenclature and numbering are accurate for the plant and revise as needed.}

TS 3.8.1, Required Action A.3 Completion Time currently states (in part):

- 24 hours from discovery of two divisions with no offsite power

[OR

In accordance with the Risk Informed Completion Time Program]

The Completion Time is revised to state:

- 24 hours **[or in accordance with the Risk Informed Completion Time Program]** from discovery of two divisions with no offsite power

1.2 Additional Proposed TS Changes

{NOTE: Use this section if variations are proposed. Add additional subsections if needed. Editorial variations discussed below in section 1.2.1 do not warrant removal from the CLIP and do not require any additional technical branches to be on the review. Variations discussed in section 1.2.2, may remove the LAR from the CLIP and may require additional technical review depending on the significance of the variations. Discuss the variations with STSB staff before engaging other technical review branches.}

In addition to the changes proposed consistent with the traveler discussed in section 1.1, the licensee proposed the variation[s] below.

1.2.1 Editorial Variations

{NOTE: Use this section if the plant has different numbering/nomenclature or modify accordingly for other editorial changes made.}

The licensee noted that **[name of facility]** TSs have different numbering **[and nomenclature]** than standard technical specifications (STSs).

1.2.2 Other Variations

{NOTE: Use this section if the plant has variations other than editorial variations discussed in 1.2.1.}

2.0 REGULATORY EVALUATION

2.1 Applicable Regulatory Requirements and Guidance

The regulation under Title 10 of the *Code of Federal Regulations* (10 CFR) 50.36(b) requires that:

Each license authorizing operation of a ... utilization facility ... will include technical specifications. The technical specifications will be derived from the

analyses and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to [10 CFR] 50.34 ["Contents of applications; technical information"]. The Commission may include such additional technical specifications as the Commission finds appropriate.

The categories of items required to be in the TS are listed in 10 CFR 50.36(c). The regulation at 10 CFR 50.36(c)(2) requires that TS include limiting conditions for operations (LCOs). Per 10 CFR 50.36(c)(2)(i), LCOs "are the lowest functional capability or performance levels of equipment required for safe operation of the facility." The regulation also requires that when an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TS until the condition can be met.

The NRC staff's guidance for the review of TS is in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition" (SRP), Chapter 16, Section 16.0, "Technical Specifications," March 2010 (ML100351425). The NRC staff's review includes consideration of whether the proposed changes are consistent with the **[insert applicable NUREG from list in footnote]**¹.

3.0 TECHNICAL EVALUATION

3.1 Proposed TS Changes to Adopt TSTF-592

The regulatory framework the NRC staff used to determine the acceptability of the licensee's proposed changes consisted of the requirements and guidance listed in section 2.1 of this SE. The NRC staff compared the licensee's proposed TS changes summarized in section 1.1 of this SE against the changes approved in TSTF-592. In accordance with SRP Chapter 16.0, the NRC staff determined that the STS changes approved in TSTF-592 are applicable to **[name of facility]** TSs because the **[name of facility]** is a **[insert BWR design: BWR/4, BWR/6, etc.]** and the NRC staff approved the TSTF-592 changes for BWR designs.

TSTF-592 revised the ADS instrumentation remedial action requirements contained in the ECCS instrumentation specification, STS 3.3.5.1, to correct overly restrictive action requirements, and to treat less significant channel inoperabilities consistently. **[Insert if applicable to licensee: In addition, TSTF-592 revised the presentation of Risk Informed Completion Times to provide consistency and clarity without changing the intent of the STS.]** The NRC staff finds that the licensee's proposed changes to **[name of facility]** TS in section 1.1 of this SE are consistent with those found acceptable in TSTF-592.

In the NRC SE of TSTF-592, the NRC staff concluded that the proposed changes to STS 3.3.5.1 were acceptable because the remedial actions to be taken until the LCO can be met provided protection to the health and safety of the public. The NRC staff also concluded that there was reasonable assurance that proposed changes would continue to ensure that

¹U.S. Nuclear Regulatory Commission, "Standard Technical Specifications, General Electric BWR/4 Plants," NUREG-1433, Volume 1, "Specifications," and Volume 2, "Bases," Revision 5.0, September 2021 (ML21272A357 and ML21272A358, respectively). NUREG-1433 provides the STS for BWR/4 plant designs, but is also representative of the BWR/2, BWR/3, and, in some cases, the BWR/5 plant design.

•U.S. Nuclear Regulatory Commission, "Standard Technical Specifications, General Electric BWR/6 Plants," NUREG-1434, Volume 1, "Specifications," and Volume 2, "Bases," Revision 5.0, September 2021 (ML21271A582 and ML21271A596, respectively). NUREG-1434 provides the STS for BWR/6 plant designs but is also representative in some cases of the BWR/5 plant design.

when STS LCO 3.3.5.1 was not met, the licensee shall shut down the reactor or follow any remedial action permitted by the STS until the condition could be met. For example, the proposed remedial actions continued to ensure that appropriate actions were taken for channel inoperabilities associated with pump pressure and manual initiation that resulted in 1) a loss of automatic initiation capability in both ADS trip systems, 2) a loss of automatic initiation capability for one ADS trip system, or 3) no loss of automatic initiation capability in either trip system but required restoration to ensure overall redundancy and diversity of the ADS trip system functions. Therefore, the NRC staff found that the proposed changes to STS 3.3.5.1 were acceptable because they continued to meet the requirements of 10 CFR 50.36(c)(2)(i) as discussed in section 3.0 of the NRC staff's SE of TSTF-592. For these same reasons, the NRC staff concludes that the corresponding proposed changes to the **[name of facility]** TS in section 1.1 of this SE continue to meet the requirements of 10 CFR 50.36(c)(2)(i).

3.2 Additional Proposed Changes

{NOTE: Use this section if variations are proposed. Add additional subsections if needed. Variations evaluated in section 3.2.2 may remove the LAR from the CLIP and may require additional technical review depending on the significance of the variations. Additionally, the variations may require additional regulations/guidance being included in the Regulatory Evaluation Section.}

In addition to the changes proposed consistent with the traveler discussed in sections 1.1, the licensee proposed the variation[s] below.

3.2.1 Editorial Variations

{NOTE: Use this section if the plant has different numbering/nomenclature or modify accordingly for other changes described in section 1.2.1 of this SE.}

The LAR noted that the **[name of facility]** TSs have different numbering **[and nomenclature]** than STS. The NRC staff finds that the different TS numbering **[and nomenclature]** changes proposed in the LAR are acceptable because they do not substantively alter TS requirements.

3.2.2 Other Variations

{NOTE: Use this section if the plant has variations described in section 1.2.2 of this SE.}

3.3 TS Change Consistency

The NRC staff reviewed the proposed TS changes for technical clarity and consistency with the existing requirements for customary terminology and formatting. The NRC staff finds that the proposed changes are consistent with chapter 16.0 of the SRP and are therefore acceptable.

4.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.