

DRAFT SAFETY EVALUATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
TECHNICAL SPECIFICATIONS TASK FORCE TRAVELER
TSTF-596, REVISION 2, "EXPAND THE APPLICABILITY OF THE SURVEILLANCE
FREQUENCY CONTROL PROGRAM (SFCP)"
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS
(EPID: L-2023-PMP-0002)

1.0 INTRODUCTION

By letter dated October 8, 2024, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24282B020), the Technical Specifications Task Force (TSTF) submitted Traveler TSTF-596, Revision 2, "Expand the Applicability of the Surveillance Frequency Control Program (SFCP)" (TSTF-596), to the U.S. Nuclear Regulatory Commission (NRC). TSTF-596 proposed changes to the Standard Technical Specifications (STS) for all operating reactor designs (except the AP-1000 design) under the Consolidated Line Item Improvement Process (CLIIP). Upon approval, these changes would be incorporated into future revisions of NUREG-1430, NUREG-1431, NUREG-1432, NUREG-1433, and NUREG-1434.¹ This STS change will be made available to licensees for adoption through the CLIIP.

The proposed changes would: 1) expand the applicability of the SFCP to include other periodic testing frequencies in STS Section 5.5, "Programs and Manuals;" 2) revise the SFCP to reference additional regulatory mechanisms that may be used to control surveillance frequencies (i.e., Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a and 10 CFR 50.69); 3) revise Surveillance Requirements (SRs) that reference the Inservice Testing (IST) Program to instead reference the SFCP or to describe the required test; and 4) correct some editorial errors in the STS. In addition, the STS Bases would be revised to replace all references to the IST Program with a reference to 10 CFR 50.55a, "Codes and standards," Paragraph (f), "Preservice and inservice testing requirements," which is the regulation that requires the IST requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPV Code) and the ASME Operation and Maintenance [OM] of Nuclear Power Plants, Division 1, OM Code: Section IST (OM Code) be met as incorporated by reference in 10 CFR 50.55a.

¹ NRC NUREG-1430, "Standard Technical Specifications, Babcock and Wilcox Plants," Volume 1, "Specifications," and Volume 2, "Bases," Revision 5, September 2021 (ML21272A363 and ML21272A370, respectively). NRC NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Volume 1, "Specifications," and Volume 2, "Bases," Revision 5, September 2021 (ML21259A155 and ML21259A159, respectively). NRC NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants," Volume 1, "Specifications," and Volume 2, "Bases," Revision 5, September 2021 (ML21258A421 and ML21258A424, respectively). NRC NUREG-1433, "Standard Technical Specifications, General Electric BWR/4 Plants" Volume 1, "Specifications," and Volume 2, "Bases," Revision 5, 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 this case, of the BWR/5 plant design. NRC NUREG-1434, "Standard Technical Specifications, General Electric BWR/6 Plants" Volume 1, "Specifications," and Volume 2, "Bases," Revision 5, 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.

1.1 Description of the SFCP

The SFCP is a program that controls the frequencies of technical specification (TS) SRs for structures, systems, and components (SSCs). The SFCP uses a risk-informed process to allow licensees to optimize the frequency of surveillance activities. The SFCP reduces the number of surveillances performed which can reduce the risk of plant transients. The SFCP is part of the STS Section 5, "Administrative Controls." Changes to surveillance frequencies are made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies."

1.2 Description of the Proposed Changes

1.2.1 Proposed Changes to the SFCP

Specifications 5.5.19 in NUREG-1430, NUREG-1431 and NUREG-1432, and 5.5.16 in NUREG-1433 and NUREG-1434 are entitled, "Surveillance Frequency Control Program." TSTF-596 proposes that each would be revised as follows (new text shown in *italics*):

This program provides controls for Surveillance Frequencies *and the frequencies of other periodic testing required by these Technical Specifications (herein also referred to as Surveillance Frequencies)*. The program shall ensure that Surveillance Requirements *and other required testing* specified in these Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation *and other requirements* are met.

a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.

b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made:

1. *In accordance with the requirements of 10 CFR 50.55a for testing required by 10 CFR 50.55a(f);*

2. *In accordance with the requirements of 10 CFR 50.69(d)(2) for testing permitted under 10 CFR 50.69(b)(1)(v) in lieu of testing required by 10 CFR 50.55a(f);*

3. *Otherwise*, in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.

c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to Frequencies established in the Surveillance Frequency Control Program, *except:*

1. *For testing required by 10 CFR 50.55a(f), Surveillance Requirement 3.0.2 is only applicable as permitted by that regulation; and*

2. *Surveillance Requirement 3.0.3 is only applicable to other required testing when invoked by a Chapter 5 Specification.*

As discussed below, the inclusion of language related to 10 CFR 50.69 in this provision would not permit licensees adopting this traveler to apply this alternative without a license amendment to adopt 10 CFR 50.69.

1.2.2 Proposed Changes Related to the Inservice Testing Program

TSTF-596 proposes the following changes related to how the IST Program is referenced:

- In STS 1.1, the definition of "Inservice Testing Program" would be removed.
- All SR test frequencies that state "in accordance with the Inservice Testing Program" would be revised to state "in accordance with the Surveillance Frequency Control Program."
- All SRs that reference the IST Program in the surveillance would be revised to replace the reference with a description of the required test.
- The STS Bases for each SR that is required by the IST Program would be revised to indicate that it is to be performed in accordance with 10 CFR 50.55a(f), which is the regulatory requirement for licensees to meet the IST requirements of the ASME BPV and OM Codes.
- The STS Bases for SR frequencies for surveillances that are required by the IST Program would be revised to state, "The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f)."

1.2.3 Proposed Changes to Periodic Testing Requirements in Section 5.5 Programs

TSTF-596 proposes that the periodic testing frequencies required by four Section 5.5 programs would be revised to reference the SFCP². The specific revised testing frequencies are in the following programs:

- Primary Coolant Sources Outside Containment,
- Ventilation Filter Testing Program (VFTP),
- Diesel Oil Testing Program, and
- Control Room Envelope (CRE) Habitability Program.

The periodic testing frequencies for these programs would be revised to state that they are tested at "a Frequency in accordance with the Surveillance Frequency Control Program."

² The specific STS Sections affected by the proposed change to the Section 5.5 programs are:

NUREG-1430, NUREG-1431, NUREG-1432

5.5.2, "Primary Coolant Sources Outside Containment"

5.5.10, "Ventilation Filter Testing Program (VFTP)"

5.5.12, "Diesel Fuel Oil Testing Program"

5.5.17, "Control Room Envelope (CRE) Habitability Program"

NUREG-1433, NUREG-1434

5.5.2, "Primary Coolant Sources Outside Containment"

5.5.7, "Ventilation Filter Testing Program (VFTP)"

5.5.9, "Diesel Fuel Oil Testing Program"

5.5.14, "Control Room Envelope (CRE) Habitability Program"

1.2.4 Editorial Corrections

The traveler also proposed to make two editorial corrections. The corrections are described and evaluated in Section 3.6 of this safety evaluation.

2.0 REGULATORY EVALUATION

As described in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39132, dated July 22, 1993), the NRC and industry task groups for new STS recommended that the new STS include greater emphasis on human factors principles to add clarity and understanding to the text of the STS, and provide improvements to the STS Bases. The improved vendor-specific STS were developed and issued by the NRC in September 1992.

The Commission's Final Policy Statement states that each Limiting Condition for Operation (LCO), action, and SR should have supporting Bases, and the Bases should at a minimum address certain questions and cite references to appropriate licensing documentation (e.g., FSAR, Topical Report) to support the Bases.

10 CFR 50.36(b) states:

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.

10 CFR 50.36(c) states that TS will include items in several categories, which include Paragraph (3), "Surveillance requirements." It defines SRs as, "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met."

10 CFR 50.55a, Paragraph (f), requires licensees to meet the IST requirements of the ASME BPV and OM Codes.

10 CFR 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors," provides alternative requirements for some SSCs in lieu of the requirements of 10 CFR 50.55a(f). However, 10 CFR 50.69(b)(2) states, "[a] licensee voluntarily choosing to implement this section shall submit an application for license amendment under § 50.90...." 10 CFR 50.69(b)(3) states, "The Commission will approve a licensee's implementation of this section if it determines that the process for categorization of [risk-informed safety classification (RISC)] RISC-1, RISC-2, RISC-3, and RISC-4 SSCs satisfies the requirements of § 50.69(c) by issuing a license amendment approving the licensee's use of this section." Therefore, a licensee may not implement the requirements of 10 CFR 50.69 without prior NRC approval.

The NRC staff's guidance for the review of TSs 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 16.0, "Technical Specifications," Revision 3, dated March 2010 (ML100351425).

1 3.0 TECHNICAL EVALUATION

2
3 3.1 Changes to the SFCP in the STS

4
5 The traveler proposes expansion of the SFCP to include other STS periodic tests that had not
6 previously been included in the SFCP. Specifically, the proposed SFCP expansion would
7 include: 1) surveillance testing required by the IST Program; 2) surveillance testing in which an
8 alternative treatment has been applied in accordance with 10 CFR 50.69(b)(1)(v) in lieu of the
9 IST Program requirements; and 3) periodic testing that is required by the STS Section 5.5
10 programs for Primary Coolant Sources Outside Containment, VFTP, Diesel Fuel Oil Testing, and
11 CRE Habitability. To accomplish this, additional methodologies for the control of surveillance
12 frequencies are added to the SFCP to reference the applicable regulatory requirements for
13 implementing the IST Program and 10 CFR 50.69 alternative treatment.

14
15 As currently structured, the STS format creates potential confusion for SSCs with surveillances
16 that state that the surveillance frequency is “[i]n accordance with the INSERVICE TESTING
17 PROGRAM.” If a licensee that has an NRC-approved license amendment to implement 10 CFR
18 50.69 categorizes an SSC as RISC-3 and its TSs state that the surveillance frequency for that
19 SSC must be in accordance with the INSERVICE TESTING PROGRAM, there could be
20 confusion as to whether the licensee can apply the alternative treatment described in 10 CFR
21 50.69(d)(2) without a license amendment to change its TSs. The traveler proposes a TS
22 structure that will permit a licensee that has an NRC-approved 10 CFR 50.69 license
23 amendment to utilize the provisions of 10 CFR 50.69 as a basis for changing the frequency for
24 certain surveillance actions specified in the TSs without requiring a TS license amendment to
25 revise those frequencies.

26
27 The traveler proposes to describe all the possible surveillance frequency control processes
28 under the envelope of the SFCP, which then allows licensees to utilize the applicable process in
29 accordance with the NRC regulations and the plant-specific licensing basis. Specifically, the
30 traveler 1) revises the SR frequencies that reference the IST Program to reference the SFCP, 2)
31 revises the SFCP to include the applicable regulatory requirements for both IST Program testing
32 and 10 CFR 50.69 alternative treatment and 3) retains the existing surveillance frequency
33 control process for SR frequencies already covered under the SFCP. With this structure, the
34 traveler, if adopted by a licensee that has received a 10 CFR 50.69 license amendment, will
35 permit the licensee to use the alternative treatment requirements as a basis for changing the
36 frequencies of TS surveillance actions for SSCs that have been categorized as RISC-3 without
37 submitting a license amendment to change the frequencies specified in the TS. The traveler
38 would not, however, modify the required surveillance action specified in the TS. The NRC staff’s
39 evaluation of these proposed changes is provided in Sections 3.2 through 3.6 below.

40
41 3.2 Technical Evaluation of Changes to Surveillances Required by the Inservice Testing
42 Program References (Paragraph b.1)

43
44 There are three ways the STS typically identify surveillance testing to be performed in
45 accordance with the IST Program:

- 46
47 1) The TS SR and the associated Frequency both state that the SR is to be conducted in
48 accordance with the IST Program,
49 2) Only the Surveillance Frequency states that the SR is to be performed in accordance
50 with the IST Program, or

- 1 3) The Bases identify that the SR or associated Frequency should be performed in
2 accordance with the IST Program, the ASME Code, or the ASME OM Code.
3

4 The proposed changes in the traveler add the IST Program surveillances to the SFCP and
5 provide a consistent method of identifying IST Program surveillances in the STS by:
6

- 7 1) The addition of new paragraph b.1 to the SFCP in Specification 5.5.19 in NUREG-1430,
8 NUREG-1431 and NUREG-1432, and 5.5.16 in NUREG-1433 and NUREG-1434 which
9 would state that changes to frequencies listed in the SFCP shall be made "[i]n
10 accordance with the requirements of 10 CFR 50.55a for testing required by 10 CFR
11 50.55a(f)."
12 2) Removing all references to the IST Program in the STS SRs and replaces them with a
13 description of the test to be performed.
14 3) Removing all references to the IST Program in SR frequencies and replaces them with a
15 statement saying that the frequency is "[i]n accordance with the Surveillance Frequency
16 Control Program[.]"
17 4) Removing the definition of Inservice Testing Program in Section 1.1 of the STS.
18 5) Revising the STS Bases for all SRs required by the IST Program to state that the SRs
19 are performed in accordance with 10 CFR 50.55a(f).
20 6) Revising the STS Bases for the SR Frequency for each SR required by the IST Program
21 to state: "The Surveillance Frequency is controlled under the Surveillance Frequency
22 Control Program in accordance with the requirements of 10 CFR 50.55a(f)."
23

24 The NRC staff evaluated the proposed changes and found:
25

- 26 • The definition of Inservice Testing Program in Section 1.1 of the STS states that "The
27 INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of
28 10 CFR 50.55a(f)." Accordingly, there is no change in requirements by changing references
29 to the IST Program from "in accordance with the Inservice Testing Program" to "in
30 accordance with 10 CFR 50.55a(f)."
31 • One of the methods previously found acceptable by the NRC staff that is currently used in
32 the STS for identifying surveillances that are required to be performed in accordance with
33 10 CFR 50.55a(f) is to state in the STS Bases that the SR must be performed in accordance
34 with the IST Program, the ASME Code, or the ASME OM Code. Revising the STS Bases for
35 all SRs required by the IST Program, ASME Code, or ASME OM Code to state that they are
36 required to be performed in accordance with 10 CFR 50.55a(f) provides consistency on how
37 the IST requirements are identified in the STS and improved clarity for those requirements
38 by citing the regulation in lieu of codes or code terminology. The technical requirements for
39 the performance of these surveillances are not modified in any way by this change.
40 • The removal of references to the IST Program in the individual SRs and describing the
41 surveillance to be performed does not change the SR to be performed. In addition, the
42 surveillance will continue to be identified as being required by 10 CFR 50.55a(f) in the
43 associated STS Bases for each SR. Changing the STS Bases to state that the SRs are
44 performed in accordance with 10 CFR 50.55a(f) instead of the IST Program or ASME Code
45 does not change the SR requirement in any way.
46 • The current IST Program SR Frequencies state that they are to be performed "[i]n
47 accordance with the Inservice Testing Program." Accordingly, they can only be changed in
48 accordance 10 CFR 50.55a. The traveler proposes to modify the IST Program SR
49 Frequencies to state that they are to be performed in accordance with the SFCP. Since the

SFCP is also modified in the traveler to state that changes to the frequencies listed in the SFCP shall be made “[i]n accordance with the requirements of 10 CFR 50.55a for testing required by 10 CFR 50.55a(f),” there is no change to how the surveillance frequencies for IST Program are controlled.

- Specifying in the STS Bases which SRs are required to be performed in accordance with 10 CFR 50.55a(f) is acceptable because there are regulatory controls on these requirements. Specifically, the Bases Control Program in Section 5.5 of the STS only allows changes to the Bases to be made without prior NRC approval if they do not require a change to the TSs or are allowed pursuant to the requirements of 10 CFR 50.59. In addition, the regulation continues to require that the IST requirements specified in the ASME BPV or OM Codes be met.
- The requirements of 10 CFR 50.55a(f) will continue to be met because the IST requirements that are also TS SRs will be clearly identified in the STS Bases for the appropriate SRs. In addition, changes to the IST frequencies can only be made in accordance with 10 CFR 50.55a.
- In that no technical changes are made to any of the IST-related SRs, 10 CFR 50.36(c)(3) will continue to be met because the SRs will continue to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

Based on the above evaluation, the NRC staff concludes that that overall effect of these changes is to restructure and clarify the SRs related to the IST Program. In addition, these changes are administrative only since no technical requirements are changed for the IST Program. Therefore, the NRC staff finds these changes to be acceptable.

3.3 Technical Evaluation of Changes to Surveillances to Which an Alternative Treatment Has Been Applied in Accordance With 10 CFR 50.69(b)(1)(v) (Paragraph b.2)

Paragraph b of the SFCP in Specification 5.5.19 in NUREG-1430, NUREG-1431 and NUREG-1432, and 5.5.16 in NUREG-1433 and NUREG-1434 specifies the conditions under which changes to surveillance frequencies may be made. The traveler proposes the addition of new Paragraph b.2, which would state that changes to frequencies listed in the SFCP shall be made “[i]n accordance with the requirements of 10 CFR 50.69(d)(2) for testing permitted under 10 CFR 50.69(b)(1)(v) in lieu of testing required by 10 CFR 50.55a(f).”

10 CFR 50.69 is an optional rule that allows a licensee to use an NRC-approved risk-informed process to categorize SSCs into one of four RISC categories. For SSCs that are determined to be safety-related SSCs that perform low safety significance functions (RISC-3), alternative treatment provisions may be used in lieu of certain other regulatory requirements. As stated in 10 CFR 50.69(b)(2), “[a] licensee voluntarily choosing to implement this section shall submit an application for license amendment under § 50.90....” 10 CFR 50.69(b)(3) states,

The Commission will approve a licensee's implementation of this section if it determines that the process for categorization of RISC-1, RISC-2, RISC-3, and RISC-4 SSCs satisfies the requirements of § 50.69(c) by issuing a license amendment approving the licensee's use of this section.

Therefore, by regulation, a licensee may not implement the requirements of 10 CFR 50.69 without prior NRC approval. This approval is separate from the approval to adopt TSTF-596. While TSTF-596 is structured to permit the use of 10 CFR 50.69 without requiring another TS

1 change upon adoption of 10 CFR 50.69, adoption of the traveler itself would not give licensees
2 approval to utilize 10 CFR 50.69. Therefore, the changes proposed for implementing 10 CFR
3 50.69 in the SFCP would not be applicable until the licensee had: 1) an approved license
4 amendment from the NRC to apply 10 CFR 50.69 and 2) applied alternative treatments in
5 accordance with the regulation. Furthermore, adoption of this traveler and the addition of
6 language to the TSs of a licensee that has not previously adopted 10 CFR 50.69 does not pre-
7 determine the outcome of the NRC staff's review of the license amendment to adopt 10 CFR
8 50.69. A licensee seeking to adopt 10 CFR 50.69 is still responsible for submitting a license
9 amendment that meets the relevant requirements.

10
11 Consistent with the requirements of 10 CFR 50.69, Section 2.1 of TSTF-596 states, "Licensees
12 that receive NRC approval to use 10 CFR 50.69 may apply a categorization process to
13 determine the Risk-Informed Safety Class (RISC) for structures, systems, or components
14 (SSCs)." Similarly, Section 3.3 of TSTF-596 states, "Licensees that have not been approved to
15 use 10 CFR 50.69 do not have Frequencies permitted under 10 CFR 50.69(b)(1)(v). Therefore,
16 that provision cannot be used until the licensee is approved to use 10 CFR 50.69." Based on
17 these statements, the NRC staff finds that TSTF-596 makes it clear that that proposed provision
18 in Paragraph b.2 of the SFCP cannot be used until the licensee has NRC approval to use
19 10 CFR 50.69, and that approval of TSTF-596 does not constitute approval for the licensee to
20 utilize the provisions of 10 CFR 50.69.

21
22 The purpose of adding Paragraph b.2 to the SFCP (in combination with the IST changes
23 discussed in Section 3.2 above) is to clarify that a licensee who has an approved license
24 amendment from the NRC to utilize the provisions of 10 CFR 50.69 may control a surveillance
25 frequency of a RISC-3 SSC that had previously been tested in accordance with the INSERVICE
26 TESTING PROGRAM, where the INSERVICE TESTING PROGRAM had previously been defined
27 as the program that fulfilled the requirements of 10 CFR 50.55a(f) without needing an additional
28 license amendment to revise its TSs. The proposed SFCP revision is structured to allow
29 licensees to apply the appropriate applicable methodology (consistent with their licensing basis)
30 for controlling the surveillance frequency.

31
32 The NRC staff reviewed the proposed addition of Paragraph b.2 to the SFCP. The staff found
33 that SSCs are subject to the alternative treatment requirements specified in 10 CFR 50.69(d)(2)
34 for the SSCs that a licensee categorized as RISC-3 in accordance with 10 CFR 50.69 and
35 chose to remove from the inservice testing or inservice inspection requirements of 10 CFR
36 50.55a(f) in accordance with 10 CFR 50.69(b)(1)(v). Where the NRC has approved a license
37 amendment to implement 10 CFR 50.69, the revised SFCP requires that RISC-3 SSCs continue
38 to meet the acceptance criteria specified in the applicable TS SR requirements. However, the
39 surveillance frequency could be determined as part of the alternative treatment developed in
40 accordance with 10 CFR 50.69. In other words, for a licensee that has received a 10 CFR
41 50.69 license amendment, the Surveillance Requirements in the TS for RISC-3 components
42 remain as written. However, the licensee can adjust the frequency of the Surveillance
43 Requirement based on its 10 CFR 50.69 program (rather than the 10 CFR 50.55a IST program
44 that 10 CFR 50.69 allows to be removed for RISC-3 components).

45
46 The proposed changes do not involve a change to any safety limits, limiting safety system
47 settings, limiting control settings, LCOs, design features, or administrative controls required by
48 10 CFR 50.36. Therefore, the proposed changes do not impact the initiators or assumptions of
49 analyzed events, nor do they impact mitigation of accidents or transient events. In addition,
50 10 CFR 50.36(c)(3) will continue to be met because the SRs will continue to assure that the

necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

Based on the above evaluation, the NRC staff concludes the proposed addition of Paragraph b.2 to the SFCP in the STS is acceptable.

3.4 Technical Evaluation of Paragraph b.3

Paragraph b of the SFCP originally stated that all surveillance frequencies would be controlled in accordance with NEI 04-10. The traveler proposes to add a new Paragraph b.3 specifying that all surveillance frequencies not controlled in accordance with Paragraphs b.1 and b.2 of the SFCP will be controlled in accordance with NEI 04-10. The addition of Paragraph b.3 ensures that there is no change in the requirement for the existing SRs in the SFCP to be controlled in accordance with NEI 04-10. Therefore, this change is acceptable.

3.5 Technical Evaluation of the Addition of Section 5 Periodic Test Programs to the SFCP

The NRC's approval (ML090900716) of TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," (ML090850642) established the SFCP in the STS. The approved traveler TSTF-425 allowed all periodic surveillance frequencies to be relocated to the SFCP and controlled using the methodology described in Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1 (ML071360456), except for the following:

- Frequencies that reference other approved programs for the specific interval (such as the Inservice Testing Program);
- Frequencies that are purely event-driven;
- Frequencies that are event-driven, but have a time component for performing the surveillance on a one-time basis once the event occurs; and
- Frequencies that are related to specific conditions (e.g., battery degradation) or conditions for the performance of a surveillance requirement (e.g., "drywell to suppression chamber differential pressure decrease").

TSTF-596 also proposes to allow the frequencies for the periodic test requirements of the Primary Coolant Sources Outside Containment, the Ventilation Filter Testing, the Diesel Oil Testing, and the CRE Habitability programs to be relocated to the SFCP. These frequencies would be controlled in accordance with NEI 04-10.

The NRC staff evaluated the proposed addition of the Primary Coolant Sources Outside Containment, VFTP, Diesel Oil Testing Program, and CRE Habitability Program to the SFCP for the identified Section 5.5 tests and determined that the SR frequencies do not meet any of the exclusion criteria in the approved TSTF-425, the frequencies are fixed periodic frequencies, and the proposed changes are consistent with the intent of TSTF-425. Based on this, the NRC staff finds that relocation of these Section 5.5 testing frequencies to the SFCP is acceptable.

3.6 Other Changes to the SFCP and STS Bases

In the current STS, Paragraph c of the SFCP states that the provisions of SR 3.0.2 and SR 3.0.3 apply to the frequencies controlled by the SFCP. This statement is not correct under the proposed revision due to the addition of IST Program SRs and Section 5.5 periodic testing.

Accordingly, the traveler proposes to modify Paragraph c of the SFCP to add two exceptions. The proposed exceptions are:

1. For testing required by 10 CFR 50.55a(f), Surveillance Requirement 3.0.2 is only applicable as permitted by that regulation; and
2. Surveillance Requirement 3.0.3 is only applicable to other required testing when invoked by a Chapter 5 Specification.

Both exceptions are consistent with current STS applicability for SR 3.0.2 and SR 3.0.3 as stated in the STS Bases. Thus, neither exception changes existing requirements. Accordingly, the NRC staff finds them to be acceptable.

The traveler also makes several minor wording changes to the STS Bases so that discussions regarding IST Program SRs refer to 10 CFR 50.55a(f), instead of the IST Program or ASME Code. The NRC staff reviewed these changes and found them to be editorial to provide consistency and clarity of the Bases. Therefore, the NRC staff finds them to be acceptable.

3.7 Corrections of Errors in the STS

The traveler proposed the correction of following two errors found in the STS:

3.7.1 CRE Habitability Program

The traveler proposes to correct an error in the CRE Habitability Program. Specifically, a sentence in Paragraph d currently states, "The results shall be trended and used as part of the [18] month assessment of the CRE boundary." The traveler proposes to revise the sentence to state the "periodic assessment" instead of the "[18] month assessment." The traveler states that this corrects an error in TSTF-448, Revision 3, "Control Room Habitability," which added the program to the STS.

The CRE Habitability Program in the STS requires that determining unfiltered air inleakage past the CRE boundary and assessment of the CRE habitability shall be performed in accordance with the methods and at the frequencies specified in accordance with Sections C.1 and C.2 of Regulatory Guide (RG) 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003 (ML031490664). Paragraph 1.5, "Periodicity" of Section C.1 in RG 1.197 states, "All CREs should be tested to establish the baseline value for inleakage and tested thereafter on a performance-based periodic frequency consistent with Figure 1." Per RG 1.197, Figure 1, the periodic assessment is performed between inleakage tests, or every 6 years. Based on this, the NRC staff concludes that the proposed correction properly states the requirements for the CRE Habitability Program as described in RG 1.197, and is therefore, acceptable.

3.7.2 SR 3.4.14.1 Bases

The traveler proposes to correct the SR 3.4.14.1 Bases in NUREG-1430, NUREG-1431, and NUREG-1432. The existing Bases incorrectly reference 10 CFR 50.55a(g), "Preservice and inservice inspection requirements." The SR is part of the IST Program. Accordingly, the reference is corrected to 10 CFR 50.55a(f), "Preservice and inservice testing requirements." This change is administrative only and does not make any technical changes. Therefore, the NRC staff finds the correction to be acceptable.

1 4.0 CONCLUSION

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3 The NRC staff reviewed traveler TSTF-596, Revision 2, which proposed changes to
4 NUREGs-1430, -1431, -1432, -1433 and -1434. The NRC staff determined that the proposed
5 changes to the STS continue to meet 10 CFR 50.36. The proposed changes ensure that the
6 requirements of 10 CFR 50.55a(f), and 10 CFR 50.69 that are applicable to TS SRs would be
7 met. Additionally, the changes to the STS were reviewed and found to be technically clear and
8 consistent with customary terminology and format in accordance with NRC Standard Review
9 Plan (SRP) Chapter 16.0, "Technical Specifications." The NRC staff reviewed the proposed
10 changes to the SRs and concluded that the modified SRs would continue to assure that the
11 necessary quality of systems and components is maintained that facility operation will be within
12 safety limits, and that the LCOs will be met, and the changes would continue to provide
13 reasonable assurance of adequate protection of the health and safety of the public. Therefore,
14 the NRC staff concludes that the TS changes proposed in TSTF-596 are acceptable.

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19 Date: December 10, 2024