November 1, 1999

Mr. James Davis, Director
Operations Department
Nuclear Energy Institute
1776 I Street, N. W.
Suite 400
Washington, DC 20006-3708

Dear Mr. Davis:

This is to inform you of our decisions on changes to the Standard Technical Specification (STS) NUREGs proposed by the NEI Technical Specification Task Force (TSTF). Those travelers Approved are TSTFs -017, R.2; 036, R.4; 037, R.2; 051, R.2; 348; 350; and -351. Those travelers Modified are TSTFs -284, R.2; 322; and -340. Our comments on those travelers Modified or Rejected are enclosed.

For your information, the following travelers are pending evaluation by a technical branch: TSTFs -052, R.2 (SPLB); -207, R.3 (SPLB); -226 (SRXB); -264 (SRXB); -295 (EICB); -296 (SRXB); -297 (SPLB); -306 (EICB); -313 (MCEB); -332 (EICB); -334 (SPLB & SPSB); -335 (SPLB); -336 (SPLB); -337 (SRXB); -343 (EMEB); -344 (SRXB); -345 (SRXB); and -352 (SRXB)

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

Sincerely,

Original Signed By

William D. Beckner, Chief
Technical Specifications Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Project No. 689
Enclosures: As stated

cc: N. Clarkson, BWOG
H. Pontious, BWROG
T. Weber, CEOG
D. Buschbaum, WOG
D. Hoffman, EXCEL

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OFFICE	RTSB/DRIP:NRR	NRR/Proj. 689	SC:RTSB/DRIP:NRR	C:RTSB/DRIP:NRR
NAME	DLJohnson*	JBirmingham*	RLDennig	WDBeckner WDB
DATE	10/26/99	10/29/99	11/0\ /99	11/ / /99

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9911141 DF03

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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Operations Department
Nuclear Energy Institute
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Washington, DC 20006-3708

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Sincerely,

William D. Beckner, Chief
Technical Specifications Branch
Division of Regulatory Improvement Programs
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cc: N. Clarkson, BWOG
H. Pontious, BWROG
T. Weber, CEOG
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12300 Twinbrook Parkway, Suite 330
Rockville, Maryland 20852

DISPOSITION SUMMARY

TSTF-284, R.2: Modify

Based on discussion with TSTF Owners Group representatives during a TSTF/RTSB meeting on 10/14/99, the staff agreed with the met/performed convention concept as proposed. However, the staff did decide to recommend modification of TSTF-284, R.2. Specifically, the staff agreed to suggest clarifications to language in insert 1 to the TSTF markup of NUREGs 1430, 1431, and 1432, to ensure NUREG Section 1.4 adequately explains the distinction between requiring a SR to be met and requiring a SR to be performed. (Note that such clarifications would also apply to NUREGs 1433 and 1434, which already contain the language of insert 1.) In addition, the staff may also propose clarifications to the language in one or more of the proposed examples 1.4-4, 1.4-5, and 1.4-6. Any suggested language changes will be forwarded with the letter requesting modification of TSTF-284, R.2. The staff also proposed that the TSTF prepare a complete list of all SRs in each NUREG (Revision 1) that have notes which modify the SR's applicability, frequency, or both. For each SR note, the list should explain why the note needs changing or does not need changing to conform to one of the met/performed frequency examples (Examples 1.4-3 through 1.4-6). Any other changes to such notes since issuance of Revision 1 of the NUREGs (i.e., changed by other approved TSTF generic changes) should also be described. The staff asked for this list because TSTF-284, R.2, appeared to omit a few notes contained in the NUREGs that may be relevant to the "met" versus "performed" issue. Such a list will reduce the chance of missing a note that needs changing, facilitate staff review, and ensure the consistent use of met and performed SR notes in all five NUREGs.

TSTF-322, R.7: Modify

During the Owners Group meeting (10/13-14/99), the staff discussed and provided marked up copies of TSTF-322, R.1 Inserts for WOG, CEOG, BWR/4 and BWR/6 (see attached).

TSTF-340: Modify

The description of this change reflects the proposal contained in TSB-015, to permit 7 days to restore the turbine-driven AFW/EFW pump to operability if the pump is found to be inoperable in Mode 3 prior to entering Mode 2 following a refueling outage (i.e., minimal decay heat). Note that the Plant Systems Branch proposed TSB-015 to address a specific concern highlighted by a Beaver Valley Technical Specification change request. Beaver Valley needed more time (more than 3 days) to repair a turbine driven pump if found inoperable following the kind of routine maintenance which is typically performed during a refueling outage. The actual change proposed by TSTF-340, however, goes further. It proposes to permit 7 days to restore the turbine-driven AFW/EFW pump to operability regardless of which Mode the inoperability occurs. The justification for this relaxation appears insufficient. The proposal also creates an ambiguity regarding the actions required should one of the turbine steam supplies become inoperable (the NUREGs presently require restoration in 7 days). Recommend modification of this proposal limiting it to the problem that TSB-015 was attempting to address. Relaxations beyond that will require stronger justification, removal of the noted ambiguity, and Plant Systems Branch approval.

TECHNICAL BRANCH NAMES AND ACRONYMS

Division of Engineering (DE)

Materials and Chemical Engineering Branch (EMCB)
Mechanical and Civil Engineering Branch (MCEB)
Electrical and Instrumentation Controls Branch (EICB)

Division of Systems Safety and Analysis (DSSA)

Plant Systems Branch (SPLB)
Reactor Systems Branch (SRXB)
Probabilistic Safety Assessment Branch (SPSB)

WOG INSERT

The Shield Building Air Cleanup System produces a negative pressure to prevent leakage from the building. SR 3.6.19.4 verifies that the shield building can be rapidly drawn down to [-0.5] inch water gauge in the annulus. This test is used to ensure shield building boundary integrity. Establishment of this pressure is confirmed by SR 3.6.19.4, which demonstrates that the shield building can be drawn down to ≤ [-0.5] inches of vacuum water gauge in the annulus ≤ [22] seconds using one Shield Building Air Cleanup System train. The time limit ensures that no significant quantity of radioactive material leaks from the shield building prior to developing the negative pressure.. Since this SR is a shield building boundary integrity test, it does not need to be performed with each Shield Building Air Cleanup System train. The Shield Building Air Cleanup System train used for this Surveillance is staggered to ensure that in addition to the requirements of LCO 3.6.19.4, either train will perform this test. The primary purpose of ~~this~~ SRs is to ensure shield building integrity. The secondary purpose of ~~these~~ SRs is to ensure that the Shield Building Air Cleanup System being tested functions as designed. The inoperability of the Shield Building Air Cleanup System train does not constitute a failure of this ~~Surveillance~~. The 18 month Frequency is based on the need to perform this Surveillance under ~~conditions~~ that apply during a plant outage.

~~LCO~~

THIS

STAT

NECESSARILY

Required to Bring Operability

CEOG INSERT

The SBEACS produces a negative pressure to prevent leakage from the building. SR 3.6.11.4 verifies that the shield building can be rapidly drawn down to ≥ [0.25] inch water. This test is used to ensure shield building boundary integrity. Establishment of this pressure is confirmed by SR 3.6.11.4, which demonstrates that the shield building can be drawn down to ≥ [0.25] inches of water ≤ 1 minute using one SBEACS train. The time limit ensures that no significant quantity of radioactive material leaks from the shield building prior to developing the negative pressure.. Since this SR is a shield building boundary integrity test, it does not need to be performed with SBEACS train. The SBEACS train used for this Surveillance is staggered to ensure that in addition to the requirements of LCO 3.6.11.4, either train will perform this test. The primary purpose of these SRs is to ensure shield building integrity. The secondary purpose of these SRs is to ensure that the SBEACS being tested functions as designed. The inoperability of the SBEACS train does not constitute a failure of this Surveillance. The 18 month Frequency is consistent with Regulatory Guide 1.52 (Ref. 1) guidance for functional testing of the ability of the SBEACS .

LCO

NECESSARY

THIS

STAFF COMM

BWR/6 INSERT

The SGT System exhausts the [secondary] containment atmosphere to the environment through appropriate treatment equipment. Each SGT subsystem is designed to draw down pressure in the [secondary] containment to ≥ [0.25] inches of vacuum water gauge in ≤ [120] seconds and maintain pressure in the [secondary] containment at ≥ [0.266] inches of vacuum water gauge for 1 hour at a flow rate ≤ [4000] CFM. To ensure that all fission products released to the [secondary] containment are treated, SR 3.6.4.1.4 and SR 3.6.4.1.5 verify that a pressure in the [secondary] containment that is less than the lowest postulated pressure external to the [secondary] containment boundary can rapidly be established and maintained. When the SGT System is operating as designed, the establishment and maintenance of [secondary] containment pressure cannot be accomplished if the [secondary] containment boundary is not intact. Establishment of this pressure is confirmed by SR 3.6.4.1.4, which demonstrates that the [secondary] containment can be drawn down to ≥ [0.25] inches of vacuum water gauge in ≤ [120] seconds using one SGT subsystem. SR 3.6.4.1.5 demonstrates that the pressure in the [secondary] containment can be maintained ≥ [0.266] inches of vacuum water gauge for 1 hour using one SGT subsystem at a flow rate ≤ [4000] cfm. The 1 hour test period allows [secondary] containment to be in thermal equilibrium at steady state conditions. The primary purpose of these SRs is to ensure [secondary] containment boundary integrity. The secondary purpose of these SRs is to ensure that the SGT subsystem being tested functions as designed. There is a separate LCO with Surveillance Requirements which serves the primary purpose of ensuring OPERABILITY of the SGT System. These SRs need not be performed with each SGT subsystem. The SGT subsystem used for these Surveillances is staggered to ensure that in addition to the requirements of LCO 3.6.4.3, either SGT subsystem will perform this test. The inoperability of the SGT System does not constitute a failure of these Surveillances. Operating experience has shown the [secondary] containment boundary usually passes these Surveillances when performed at the [18] month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

THIS LCO

NECESSARILY

STAFF COMMENT

BWR/4 INSERT

The SGT System exhausts the [secondary] containment atmosphere to the environment through appropriate treatment equipment. Each SGT subsystem is designed to draw down pressure in the [secondary] containment to ≥ [0.25] inches of vacuum water gauge in ≤ [120] seconds and maintain pressure in the [secondary] containment at ≥ [0.266] inches of vacuum water gauge for 1 hour at a flow rate ≤ [4000] CFM. To ensure that all fission products released to the [secondary] containment are treated, SR 3.6.4.1.4 and SR 3.6.4.1.5 verify that a pressure in the [secondary] containment that is less than the lowest postulated pressure external to the [secondary] containment boundary can rapidly be established and maintained. When the SGT System is operating as designed, the establishment and maintenance of [secondary] containment pressure cannot be accomplished if the [secondary] containment boundary is not intact. Establishment of this pressure is confirmed by SR 3.6.4.1.4, which demonstrates that the [secondary] containment can be drawn down to ≥ [0.25] inches of vacuum water gauge in ≤ [120] seconds using one SGT subsystem. SR 3.6.4.1.5 demonstrates that the pressure in the [secondary] containment can be maintained ≥ [0.266] inches of vacuum water gauge for 1 hour using one SGT subsystem at a flow rate ≤ [4000] cfm. The 1 hour test period allows [secondary] containment to be in thermal equilibrium at steady state conditions. The primary purpose of these SRs is to ensure [secondary] containment boundary integrity. The secondary purpose of these SRs is to ensure that the SGT subsystem being tested functions as designed. There is a separate LCO with Surveillance Requirements which serves the primary purpose of ensuring OPERABILITY of the SGT System. These SRs need not be performed with each SGT subsystem. The SGT subsystem used for these Surveillances is staggered to ensure that in addition to the requirements of LCO 3.6.4.3, either SGT subsystem will perform this test. The inoperability of the SGT System does not constitute a failure of these Surveillances. Operating experience has shown the [secondary] containment boundary usually passes these Surveillances when performed at the [18] month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

THIS LCO

NECESSARILY