

December 21, 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 -263, R.3, -265, R.2, -272, R.1, - 275, R.2, -295, and -306. Those travelers Modified are TSTFs -204, R.1, -286, R.1, and -332. Our comments on those travelers Modified or Rejected are enclosed.

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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WASHINGTON, D.C. 20555-0001

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Sincerely,

Nanette V. Gilles for

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

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cc: N. Clarkson, BWOG
H. Pontious, BWROG
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DISPOSITION SUMMARY

TSTF-204, R.1: Modify

The staff proposes that the following Bases be added to the subject specifications:

"The Shutdown Technical Specification requirements are designed to ensure that the unit has the capability to mitigate the consequences of certain postulated accidents. Worst case Design Basis Accidents which are analyzed for operating modes are generally viewed not to be a significant concern during shutdown modes due to the lower energies involved. The Technical Specifications therefore require a lesser complement of electrical equipment to be available during shutdown than is required during operating modes. More recent work completed on the potential risks associated with shutdown, however, have found significant risk associated with certain shutdown evolutions. As a result, in addition to the requirements established in the Technical Specifications, the industry has committed to NUMARC-91-06, "Guidelines for Industry Actions to Assess Shutdown Management" to manage shutdown tasks and associated electrical support to maintain risk at an acceptably low level. This may require the availability of additional equipment beyond that required by the Shutdown Technical Specifications."

TSTF-286, R.1: Modify

The following inconsistencies have been noted in the CEOG portion of the submittal.

LCO 3.4.7 - Insert 5 should refer to LCO 3.1.2, not LCO 3.1.1. LCO 3.1.2 addresses SDM in Mode 5. Insert 3 to the Required Actions of Condition B should refer to LCO 3.1.2, not LCO 3.1.1.

LCO 3.4.8 - Insert 5 should refer to LCO 3.1.2, not LCO 3.1.1. LCO 3.1.2 addresses SDM in Mode 5. Insert 3 to the Required Actions of Condition B should refer to LCO 3.1.2, not LCO 3.1.1.

Bases Pg B3.4-31 - The proposed change to this LCO 3.4.7 Bases should reference LCO 3.1.2, not LCO 3.1.1. LCO 3.4.7 is applicable in Mode 5 and LCO 3.1.2 addresses SDM in Mode 5.

Bases Pg B3.4-33 - Proposed inserts B4 and B5 to this LCO 3.4.7 bases should address LCO 3.1.2, not LCO 3.1.1.

Base Pg B3.4-36 - The proposed change to this LCO 3.4.8 Bases should reference LCO 3.1.2, not LCO 3.1.1. LCO 3.4.8 is applicable in Mode 5, and LCO 3.1.2 addresses SDM in Mode 5.

Bases Pg B3.4-37 - Inserts B4 and B5 to this LCO 3.4.8 Bases should reference LCO 3.1.2, not LCO 3.1.1.

Bases Pg B3.9-3 - It appears that Insert B12 is being added to the wrong Action. Insert B12 should be added to the Bases discussion for Actions A.1 and A.2.

Bases Pg B3.9-6 - Inserts B4 and B5 should reference the boron concentration requirements of LCO 3.9.1. LCO 3.9.2 is applicable in Mode 6, and LCO 3.9.1 addresses boron concentration requirements in Mode 6.

It appears that there are similar problems in the WOG and BWOG portions of the submittal. The OG's should review these portions of the submittal to identify and correct any inconsistencies. The OG's should consider reviewing the TSB markup of Rev. 0 of TSTF-286 for the correct references.

Insert 4 of the submittal should be changed to read "the boron concentration requirements of LCO 3.9.1" as opposed to "SDM of LCO 3.9.1."

TSTF-332: Modify

The TSTF proposes to incorporate allowances of NEDO-3229-A. This topical report eliminates required measurement of certain sensor response times. The staff agrees with the need to incorporate NEDO-3229-A, as approved by the staff SE. The TSTF package is missing RPS SR changes (SR 3.3.1.1.17 {BWR/4} SR 3.3.1.1.17 {BWR/6}) related to Insert 2 which add a note to the RPS instrumentation SR for Response Time Testing stating those sensor response times not required to be tested. This specific change was evaluated and approved for the topical report. The staff recommends adding the appropriate LCO SR notes to RPS Instrumentation consistent with the approved topical report.

The TSTF proposes adding notes to response time SRs to clarify TS actions, based on whether response times are not met due to instrumentation or due to actuated devices. This clarification was not part of the staff review and approval of NEDO-3229-A. The staff recommends removing the additional SR notes and Bases for the SR Notes from the TSTF-332 package by deleting the following:

- (1) Insert 1, Note to proposed SR 3.5.1.13 {BWR/4} SR 3.5.1.8 {BWR/6},
- (2) Insert 3B,
- (3) Insert 4,
- (4) Insert 5 Bases for proposed Note to SR 3.5.1.13 {BWR/4} SR 3.5.1.8 {BWR/6},
- (5) proposed Note 2 to SR 3.3.6.1.8 {BWR/4} SR 3.3.6.1.7 {BWR/6} and Bases, and
- (6) proposed Note 2 to SR 3.3.6.2.7 {BWR/4} SR 3.3.6.2.6 {BWR/6} and Bases.