

May 7, 2001

Mr. Michael Schoppman, Project Manager  
Licensing Department  
Nuclear Energy Institute  
1776 I Street, N. W.  
Suite 400  
Washington, DC 20006-3708

Dear Mr. Schoppman:

This is to inform you of the disposition of TSTF-373. After discussions with CEOG, the following modifications are recommended:

1. Proposed Condition A has an applicability Note that restricts the Condition to the containment sump supply valves to the ECCS and containment spray pumps. The staff safety evaluation implies that those penetrations that don't meet the topical report criteria and/or the plant specific evaluations must retain the 4 hour Completion Time. The Condition A Note should be modified to reflect these additional or potential penetrations. See comment 3 for a variation of this comment.
2. New Condition B (STS Condition A) has a bracketed exception. The bracketed exception as proposed implies that proposed Condition A has limits of some sort. Since Rev. 2 to the STS is about to be issued, it is felt that the wording used in TSTF-207, R.5 better reflects the intent of the current and proposed exception. The exception and the proposed change should be modified accordingly.
3. New Condition D (STS Condition C) was revised in TSTF-30 from 4 hours to 72 hours. It is unclear from the staff SE if all types of configurations for penetration flow paths with only one containment isolation valve and a closed system have been evaluated by the Topical Report. If they have, this comment is moot. If they have not, then an Action similar to STS Condition C as modified by TSTF-30 needs to be proposed with an applicability Note based on Comment 1 above.
4. Proposed Insert 2 is the Reviewer's Note to be added to the Bases which specifies the conditions for adopting the 7 day Completion Time. The Note just references the staff SE for the Topical Report. The Note should specifically state the staff conditions that must be met in order to use the 7 day Completion Time. The reviewer implementing the TSTF at the plant and/or the staff reviewer may not have ready access to the staff SE. Also see comment 7 below. In addition the Reviewer's Note should state that if the conditions or criteria

cannot be met then the 4/72 hour Completion Times should be used, otherwise the [7 days] in Conditions B and D would be confusing in terms of what to put in their place.

5. The Bases changes should be compared to TSTF-207 and TSTF-30 for applicability; if there are differences or changes that are required they should be discussed in the Background portion of the TSTF.
6. The Background portion of the TSTF discusses the change from 4 hours to 7 days. TSTF-30 changed STS Condition C from 4 hours to 72 days. While this should not affect the results of the Topical Report for that type of penetration or the TSTF, the Background should be revised to reflect the current STS (STS Rev. 2).
7. The Background portion of the TSTF lists the conditions for acceptance of the 7 days found in the staff SE. Condition 4 does not reflect the staff's requirement that the Configuration Risk Management Program (CRMP) be found acceptable to the staff. In addition staff condition CRMP (ii) has not been addressed in the Background section. This requirement deals with common cause failures and operability verification.

Please contact me at (301) 415-1156 or e-mail [rld@nrc.gov](mailto:rld@nrc.gov) if you have any questions or need further information on these dispositions.

Sincerely,

**/RA/**

Robert L. Dennig, Acting Chief  
Technical Specifications Branch  
Office of Nuclear Reactor Regulation

cc: See attached list

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Sincerely,

**/RA/**

Robert L. Dennig, Acting Chief  
Technical Specifications Branch  
Office of Nuclear Reactor Regulation

cc: See attached list

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