

January 10, 2002

Mr. Anthony R. Pietrangelo, Director
Risk & Performance Regulation
Nuclear Generation Division
Nuclear Energy Institute
1776 Eye Street, N.W.
Suite 400
Washington, DC 20006-2496

Dear Mr. Pietrangelo:

This is to inform you that disposition has been made on four travelers containing proposed changes to the Standard Technical Specifications (STS) NUREGs, initiated by the Nuclear Energy Institute (NEI) Technical Specification Task Force (TSTF).

The staff has rejected the following travelers based on the justification given:

TSTF-244

Multiple Westinghouse 4-loop plants have adopted NUREG-1431. For the Vogtle, Diablo Canyon and Indian Point plants, PAM containment isolation valve position instrumentation channel TS include channel calibration testing requirements consistent with current STS in NUREG-1431. However, a review of the 2-loop Point Beach TS shows these units perform a TADOT for the same PAM variable. The proposed STS change is like the Point Beach model. The Point Beach Bases state the TADOT test will compare actual valve position to indicated position. By comparison the channel calibration is a more comprehensive test than a TADOT because it tests the entire channel including required sensor, alarm, interlock, display and trip function. While a less rigorous test may be acceptable based on individual plant design or testing practices, TSTF-244 does not make supporting arguments or provide documentation that the proposed generic TS change will reduce burden, will increase efficiency or effectiveness or increase public confidence while maintaining safety.

Lacking further justification, we are unwilling to turn an exception into the rule.

TSTF-310

The STS Table 3.3.1.1-1, Note 1 for Overtemperature delta Temperature (OTdT) equation, variables and variables values serve as a generic model for trip setpoint calculation. In practice, providing the correct equation for operating plants involves making changes to the NUREG-1431 equation to be consistent with the plant-specific safety analysis setpoint methodology. Therefore, the staff position is that proposed changes to the STS OTdT equation represented in Note 1 to Table 3.3.1-1 can be reviewed on a case-by-case basis for specific plant amendment requests.

Mr. Pietrangelo

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The staff has suggested modifications to the following travelers, should you desire to pursue these changes:

TSTF-317

Address each of the following concerns related to TSTF-317 proposed NUREG-1432 changes:

- 1) Revise TSTF-317 Justification section references to LCO 3.3.5 (Analog) from LCO 3.3.4 (Analog) and to LCO 3.3.6 (Digital) from 3.3.5 (Digital).
- 2) Evaluate the need to change MODE 2 and 3 Applicability requirements in Analog Engineered Safety Features Actuation System (ESFAS) LCO 3.3.4 and ESFAS Logic and Manual Trip LCO 3.3.5 for Safety Injection Actuation Signal (SIAS) to be consistent with LCO 3.3.4 for Main Steam Isolation Signal (MSIS) Applicability and proposed MSIS changes in LCO 3.3.5.

The TSTF change proposes adding Note (a) to LCO 3.3.5, ESFAS Logic and Manual Trip Instrumentation, Table 3.3.5-1, Function 4, MSIS. Note (a) states "The MSIS Function is not required to be OPERABLE in MODES 2, 3 and 4 when all associated valves isolated by the MSIS Function are closed [and deactivated]. The staff review of ESFAS Instrumentation TS shows that Table 3.3.4-1, existing Note (d) applies to MSIS instrumentation. Note (d) states "Only the Main Steam Isolation Signal (MSIS) Function and the Steam Generator Pressure-Low and Containment Pressure -High signals are not required to be OPERABLE when all associated valves isolated by the MSIS Function are closed and [de-activated]." In Table 3.3.4-1 Note (d), Containment Pressure-High correlates to SIAS Function 2.a in the Table. Similarly, the addition of the proposed Note (a) by TSTF-315 to LCO 3.3.5, Table 3.3.5-1, Function 4 (MSIS) should also apply to Function 1 (SIAS) in the same table. Therefore in order to establish a consistent set of applicability requirements between the ESFAS Instrumentation channels and the ESFAS Logic and Manual Trip instrument channels it appears that Table 3.3.4-1 should be revised to apply Note (d) to both MSIS Function 4.a, Steam Generator Pressure-Low and SIAS Function 2.a, Containment Pressure-High for MODES 2 and 3 and Table 3.3.5-1 should be revised to apply proposed Note (a) Function 4 (MSIS) and Function 1 (SIAS).

As an alternate to the conclusions from this evaluation, Table 3.3.4-1 Note (d) may incorrectly reference "Containment High-Pressure", thus the mismatch may be resolved by revising Note (d) to only reference the MSIS Steam Generator Pressure-Low parameter which is the MSIS actuation function.

- 3) Revise TSTF-317 proposed Note (a) to delete "in MODES 2, 3, and 4." This reference is repetitive since Note (a) only applies to the MODE 2, 3, and 4 for MSIS and SIAS (if applicable. . . . see previous comment) Function(s) in Table 3.3.5-1(Analog).
- 4) Revise TSTF-317 Note (c) to delete "in MODES 2 and 3." This reference is repetitive since Note (c) only applies to the MODES 2 and 3 for MSIS Functions in Table 3.3.6-1 (digital).

TSTF-354

The staff notes that the proposed clarifying statement may result in more than removing an unnecessary restriction resulting from conducting TS required testing; it may result in establishing unacceptable TS practices or non-compliance with TS. STS Bases state "these trip Functions are normally accomplished automatically by pressure transmitters sensing turbine first stage pressure." Therefore, during transition power levels (30% RTP/ 40% RTP) for enabling the RTS and EOC-RPT trip Functions and during power operation with bypass valves undergoing TS testing, a plant condition may exist where the automatic enable feature of the actuation logic circuitry could be defeated. This could occur because bypass flow alters the turbine first stage pressure/reactor power relationship, possibly giving a false-low turbine first stage pressure indicating reactor power is below the permissive enable setpoint.

The staff suggests the following additional justification for proposed changes:

- discuss operator actions that must be taken in order to maintain operation of a plant with the safety analysis basis by ensuring automatic trip features cannot not be bypassed during valve cycle testing for operation at and above transition to trip function enable power levels;
- provide operational data to show the extent to which the current STS Bases place an unnecessary burden on operating reactors;
- show that efficiency and effectiveness of plant operation will change as a result of implementing proposed Bases changes;
- and show that proposed Bases changes will not result in violating LCO 3.0.2 requirements for the affected RTS and EOC-RPT instrument functions.

This completes our review of the above TSTFs. Please contact me at (301) 415-1161 or e-mail wdb@nrc.gov if you have any questions or need further information on these dispositions.

Sincerely,

/RA/

William D. Beckner, Program Director
Operating Reactor Improvements Program
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