

March 21, 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 three travelers containing proposed changes to the Standard Technical Specification (STS) NUREGs, initiated by the NEI Technical Specification Task Force (TSTF).

TSTF-405

The staff has approved traveler TSTF-405 which proposed changes that revise the Bases to LCO 3.10.1 to remove a statement that the American Society of Mechanical Engineers (ASME) inservice test requires the safety/relief valves to be gagged. A safety evaluation is included with this package as supporting information. TSTF-405 will not be processed through the CLIIP.

TSTF-419

The staff has approved traveler TSTF-419 which proposed changes that: (1) revise the definition section of the TS on the pressure temperature limits report (PTLR) by deleting reference to specifications containing limits in the PTLR; and, (2) revise the administrative controls TS section 5.6.6, on the PTLR, by requiring the NRC approval documents to be identified by date, and the Topical Reports to be identified by number and title. A safety evaluation is included with this package as supporting information. Although the safety evaluation is written in the format of a model, TSTF-419 will not be processed through the CLIIP.

TSTF-344

The staff has reviewed the traveler TSTF-344 which proposed revising the surveillance frequencies for verifying nuclear power trip setpoints prior to the performance of physics testing. Comments useful for possible modification are discussed in the enclosed.

This completes our review of the above TSTFs. Please contact me at (301) 415-1156 or e-mail rld@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
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Enclosures: As stated (3)

cc: J. Arbuckle, BWROG
D. Bice, CEOG
N. Clarkson, BWOG
S. Wideman, WOG
D. Hoffman, EXCEL

Mr. Anthony R. Pietrangelo

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE REVIEW OF TSTF-405, "REMOVE STATEMENT
THAT THE ASME INSERVICE TEST REQUIRES THE SAFETY
RELIEF VALVE TO BE GAGGED"

1.0 INTRODUCTION

The Nuclear Energy Institute (NEI) Technical Specification Task Force (TSTF) has proposed a generic change to the standard technical specifications (STS) (NUREG-1433 and 1434) on behalf of the industry. This proposed generic technical specifications (TS) change, identified by TSTF-405, will revise the Bases to LCO 3.10.1 to remove a statement that the American Society of Mechanical Engineers (ASME) inservice test requires the safety / relief valves to be gagged.

2.0 BACKGROUND

The proposed generic change replaces the LCO 3.10.1 Bases statement that requires the safety relief valves to be gagged with the statement: "Performance of inservice leak and hydrostatic testing would also necessitate the inoperability of some subsystems normally required to be operable >200°F." This change is based in part on the NRC approved Code Case N-498-1 which allows the specified testing to be performed without gagging the safety / relief valves.

The STS NUREG-1433 and NUREG-1434 Revision 2 change:

B 3.10.1 LCO

"This option may be required due to P/T limits, however, which require testing at temperatures >200°F, while the ASME inservice test itself requires the safety/relief valves to be gagged preventing their OPERABILITY."

The proposed change:

B 3.10.1 LCO

"This option may be required due to P/T limits, however, which require testing at temperatures >200°F. *Performance of inservice leak and hydrostatic testing would also necessitate the inoperability of some subsystems normally required to be operable >200 °F.*"

3.0 EVALUATION

The NEI TSTF has provided the information below to support the changes for this traveler. This justification has been reviewed by the NRC staff for accuracy and has been found to be correct and therefore this change is acceptable.

"Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the ASME Boiler and Pressure Vessel Code, Article IWA-5000, "System Pressure Tests," specifies in IWA-5211(d), "Test Description," that a system hydrostatic test shall be conducted during a plant shutdown at a pressure above nominal operating pressure or system pressure for which overpressure protection is provided. Article IWA-5000 also specifies in IWA-5212(a), "pressure and Temperature," that hydrostatic test shall be conducted at test conditions specified in IWB-5000, "System Pressure Test." In addition, Article IWA-5000 specifies in IWB-5222, "System Hydrostatic Test," that the system hydrostatic test may be conducted at any test pressure specified in Table IWB-5222-1. The test pressures stipulated on this table specify hydrostatic test pressures which are a small increase over nominal operating design pressure.

The hydrostatic test pressure specified in Table IWB-5222-1 are typically in close proximity to the overpressure protection setpoints associated with the safety/relief valves. Accordingly, gagging or removal of safety and/or relief valve was necessary to prevent simmering of these valves. Simmering could adversely affect the ability of these valves to perform their overpressure function as well being able to provide an adequate leak tight barrier during normal operating conditions.

In Code Case N-498-1, "Alternative Rules for 10 Year Hydrostatic Testing for Class 1, 2, and 3 Systems, Section XI Division 1," a visual examination at the nominal operating pressure and temperature in conjunction with a system leakage test in lieu of a 10 year hydrostatic pressure test at or near the end of the 10 year interval is allowed. This Code Case eliminates the necessity to gag or remove Code safety or relief valves which places the system, and thus the plant, in an off normal state. On 12 May, 1999 Regulatory Guide 1.147, Rev. 2 "Inservice Inspection Code Case Acceptability ASME Section XI, Division 1." This Regulatory Guide approved the general use of Code Case N-498-1.

The Section XI hydrostatic pressure test is primarily regarded as a means to enhance leak detection during examination of components under pressure rather than a method to determine the structural integrity of the components. In addition, the industry experience indicates that leaks are not being discovered as a result of hydrostatic test pressures causing a pre-existing flaw to propagate through the wall. In most cases leaks are being found when the system is at normal operating pressure."

CONCLUSIONS

The NRC finds that the proposed changes will allow safe operation with the changes to the Bases for LCO 3.10.1 to remove a statement that the ASME inservice test requires the safety/relief valves to be gagged. The NRC staff also finds that the proposed changes are consistent with the NRC approved Code Case N-498-1 which specifically allows the testing to be performed without gagging the safety / relief valve. The analysis and acceptance provided in this SE, as also demonstrated by Regulatory Guide 1.147, May 1999 "Inservice Inspection Code Case Acceptability AMSE Section XI, Division 1, covers all Boiling Water Reactor NSSS plants regardless of plant vintage. The NRC staff, therefore, concludes that the proposed TSTF-405, Revision 0 changes are acceptable.

GENERIC SAFETY EVALUATION ON THE
REVISION TO TECHNICAL SPECIFICATIONS (TS) BY ADOPTING THE
TECHNICAL SPECIFICATION TASK FORCE (TSTF) CHANGE TRAVELER, TSTF-419R0,
ON THE PRESSURE TEMPERATURE LIMITS REPORT (PTLR)

INTRODUCTION:

[], the licensee, submitted a request, by letter dated [], for an amendment to License No. DPR-[] for [Nuclear Plant]. The proposed amendment adopts changes to the [Nuclear Plant's] technical specifications (TS), that are generically approved by Technical Specification Task Force (TSTF) change traveler TSTF-419R0. The proposed TS changes would: (1) revise the definition section of the TS on the pressure temperature limits report (PTLR) by deleting reference to specifications containing limits in the PTLR; and, (2) revise the administrative controls TS section 5.6.6, on the PTLR, by requiring the NRC approval documents to be identified by date, and the Topical Reports to be identified by number and title.

BACKGROUND:

The licensee has requested that the [Nuclear Plant] TS be modified to incorporate the changes in TSTF-419R0 that have been approved generically for the [CE] Standard Technical Specifications (STS), NUREG-143[2], Revision 2.

NRC Generic Letter 96-06, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," dated January 31, 1996, allows licensees to relocate the pressure temperature (P/T) limit curves from their plant TS to a PTLR or a similar document. The Low Temperature Overpressure Protection (LTOP) System limits were also allowed to be relocated to the same document. The methodology used to determine the P/T and LTOP System limit parameters must comply with the specific requirements of Appendices G and H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR), be documented in an NRC approved topical report or an NRC approved plant-specific submittal, and be incorporated by reference into the TS. Subsequent changes in the methodology must be approved by a license amendment.

The TSTF-419R0 proposed changes to the [Nuclear Plant] TS are:

A. Change to the TS Definitions Section on PTLR

The definition of PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) is revised to delete the reference to the Specifications containing the limits specified in the PTLR.

B. Changes to the Administrative Controls Section 5.6.5, Pressure Temperature Limits Report

The requirements in ITS 5.6.6, "Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)," to identify the NRC staff approval document by date is revised to allow identification of the Topical Report(s) by number and title, or the NRC Safety Evaluation for a plant specific methodology by NRC letter and date. A requirement is added to the Reviewers Note in the STS to specify that the complete citation in the PTLR for each Topical Report, include the report number, title, revision, date, and any supplements.

EVALUATION:

The proposed changes to the [Nuclear Plant] TS are evaluated below.

A. Change to the TS Definitions Section on PTLR

The definition of PTLR identifies the specifications in which the pressure and temperature limits are addressed. Specification 5.6.6.a requires that the individual specifications that address RCS pressure and temperature limits be referenced. The proposed changes to the definition eliminate the duplication between the definition of PTLR and Section 5.6.6.

B. Changes to the Administrative Controls Section 5.6.5, Pressure Temperature Limits Report

The revision to ITS 5.6.6 to allow the Topical Reports to be identified by number and title, or the NRC Safety Evaluation for a plant specific methodology by NRC letter and date, would allow licensees to use current Topical Reports to support limits in the PTLR without having to submit an amendment to facility operating license every time the Topical Report is revised. The PTLR would provide the specific information identifying the particular approved Topical Report(s) used to determine the P/T limits or LTOP System limits. This still provides the assurance that only the approved versions of the referenced Topical Reports or plant specific methodologies will be used for the determination of the P/T limits or LTOP System limits since the complete citation will be provided in the PTLR, and those limits must be approved by the NRC.

The requirement to operate within the limits in the PTLR is specified in and controlled by the Technical specifications. Only the figures, values, and parameters associated with the P/T limits and LTOP setpoints are relocated to the PTLR. The methodology for their development must be reviewed and approved by the NRC. The proposed changes do not change the requirements associated with the review and approval of the methodology or the requirement to operate within the limits specified in the PTLR.

CONCLUSION:

The RTSB staff has reviewed the licensee's proposed [Nuclear Plant] TS changes. The proposed [Nuclear Plant TS] changes are consistent with the STS, satisfy the 10 CR 50.36(c)(2)(ii) criteria, maintain safety consistent with the [Nuclear Plant] safety analysis and are acceptable for inclusion in TS.

TSTF-344 NRC STAFF REJECTION JUSTIFICATION

1. WOG STS SR 3.1.9.2

Prior to the PHYSICS TESTS, the Power Range Neutron Flux-High trip setpoint may be inadvertently affected by loss of its normal function due to perturbation to the plant equipment from various outage maintenance activities. Current STS SR 3.1.9.2 requires that verification of the Power Range Neutron-High trip setpoint be performed within 8 hours prior to initiation of the PHYSICS TESTS in order to insure that the RTS is properly set to perform PHYSICS TESTS. The proposed STS will change the frequency for verification from "Within 8 hours to initiation of PHYSICS TESTS," to "Prior to performance of PHYSICS TESTS." The removal of the time limit, "within 8 hour," creates ambiguities as to when the verification of the trip setpoint will be performed and increases the uncertainty of the effectiveness of the SR. Therefore, we conclude that the removal of the time limit is not prudent and the proposed TS changes are not acceptable.

2. BAW STS SR 3.1.8.3, 3.1.9.2

Current STS SR 3.1.8.3 and 3.1.9.2 require that verification of the nuclear overpower trip setpoint be performed every 8 hours during PHYSICS TESTS, to insure that the RTS is properly set to perform PHYSICS TESTS.

The BAW Owners' Group (OG) indicates that various activities are involved in performing verification of the nuclear overpower trip setpoint and claims that the frequency of every 8 hours for the required verification creates undue burden on the plant operation during a period of time when PHYSICS TESTS are being performed. Since the time frame for PHYSICS TESTS is relatively short and the degradation of the trip setpoint is unlikely to increase significantly in the short time period, the frequency of every 8 hours for the required SR is too restrictive. Therefore, the BAWOG proposes to change the SR frequency from "8 hours" to "Prior to performance of PHYSICS TESTS."

While we agree that the significant degradation of the overpower trip setpoint is unlikely to occur in a short period of time and it is not necessary to perform SR 3.1.8.3 and 3.1.9.2 every 8 hours during PHYSICS TESTS, we have determined as discussed in item 1 above that removal of the specific time limit in the existing SRs will increase the uncertainty of the effectiveness of the SRs. Therefore, we conclude that without specifying an acceptable time limit (such as "within 8 hours" in the current WOG SR 3.1.9.2), the proposed SRs are not acceptable.