

March 30, 2006

Mr. Gordon Bischoff, Manager
Owners Group Program Management Office
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

SUBJECT: CLARIFICATION OF SINGLE-FAILURE CONSIDERATIONS IN LETTER TO
WESTINGHOUSE OWNERS GROUP REGARDING TECHNICAL
SPECIFICATION ACTIONS

Dear Mr. Bischoff:

In recent meetings with NRC, representatives from the Westinghouse Owner's Group (WOG) have requested clarification of the NRC staff's position regarding the applicability of the single failure criterion while in Actions for Technical Specifications. This position was stated in a letter to you from Herbert Berkow (NRC) dated April 13, 2005, which responded to a WOG letter number WOG-04-592, "Single Failure Consideration When Technical Specification Actions Are Entered."

The staff's position, as discussed in the Appendix C.2 of Inspection Manual Part 9900, Technical Guidance, which was endorsed by Regulatory Issue Summary 2005-20, "Revision to Guidance Formerly Contained in NRC Generic Letter 91-18," is that the single failure criterion is a general design criterion that is used to evaluate system designs to ensure that a single failure does not result in a loss of the capability for the system to perform its safety function or functions. In addition, as stated in Generic Letter 80-30, "By and large, the single failure criterion is preserved by specifying Limiting Conditions for Operation that require all redundant components of safety systems to be OPERABLE. When the required redundancy is not maintained, either due to equipment failure or maintenance outage, action is required, within a specific time, to change the operating mode of the plant to place it in a safe condition. The specified time to take action, usually called the equipment out of service time (termed Completion Time in the Standard Technical Specifications), is a temporary relaxation of the single failure criterion, which consistent with overall system reliability considerations, provides a limited time to fix equipment or otherwise make it OPERABLE."

In the letter, the staff referred to the need for operational necessity in the case of the WOG proposal to ensure that there was sufficient industry need to have a plant in a configuration involving an inoperable channel and troubleshooting with a separate channel. In this configuration, the staff is concerned that the design may not have the ability to reliably perform its safety function for all analyzed events.

Finally, the April 13, 2005 letter stated that the staff was reviewing the Standard Technical Specifications applicable to other Pressurized Water Reactor and Boiling Water Reactor plants related to relaxation of the single failure criterion. We have completed that reconsideration and determined that no actions are needed at this time.

T. Boyce

- 2 -

I hope this clarifies the staff's position. If you have any questions, Carl Schulten of my staff can be reached at 301-415-0184.

Sincerely,

/RA/

Thomas H. Boyce, Chief
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

Project No. 694

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