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TECHNICAL SPECIFICATIONS TASK FORCE
A JOINT OWNERS GROUP ACTIVITY

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Chief, Rules and Directives Branch
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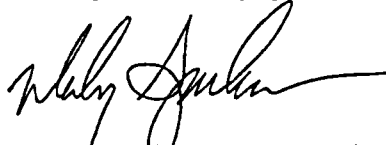
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SUBJECT: Technical Specification Task Force (TSTF) Response to the June 2, 2006 Federal Register Notice, "Notice of Opportunity To Comment on Model Safety Evaluation on Technical Specification Improvement Regarding the Addition of LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process"

Enclosed for NRC consideration are comments prepared by the Technical Specification Task Force (TSTF) on the subject June 2, 2006 Federal Register Notice on TSTF-427, Revision 2, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY."

Should you have any questions, please do not hesitate to contact us.



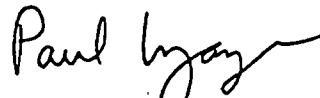
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SUNSI Review Complete

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Technical Specification Task Force (TSTF) Response to the June 2, 2006 Federal Register Notice, "Notice of Opportunity To Comment on Model Safety Evaluation on Technical Specification Improvement Regarding the Addition of LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process"

General Comments and Comments on the Notice for Comment

1. Throughout the Notice, reference is made to TSTF-427, Revision 1. Revision 2 of TSTF-427 was submitted to the NRC on May 3, 2006 (NRC accession number ML061240055). The document should be revised to reference Revision 2 instead of Revision 1.
2. In the Notice under "Applicability," the last two sentences state, "Significant variations from the approach, or inclusion of additional changes to the license, will result in staff rejection of the submittal. Instead, licensees desiring significant variations and/or additional changes should submit a LAR that does not claim to adopt TSTF-427, Rev 1." Should a licensee submit an application that requests adoption of TSTF-427 but includes significant variations or additional changes, it would facilitate the NRC's review for the licensee to acknowledge that the change is based on TSTF-427 so that the NRC may use the model Safety Evaluation to the extent possible. We recommend revising the last sentence to state, "Instead, licensees desiring significant variations and/or additional changes should submit a LAR that does not request to adopt TSTF-427, Rev 2. under the Consolidate Line Item Improvement Process."
3. The Notice generally uses the term "barrier" but uses the term "hazard barrier" or "hazard barriers" nine times. TSTF-427 and the associated implementation guidance, NEI-04-08, use the term "barriers." We recommend that the document be revised to use the word "barrier" throughout instead of the phrase "hazard barrier" so that the Traveler, the implementation guidance, the model Safety Evaluation, the model application, and the Notice are consistent.

Comments on the Model Safety Evaluation

1. Section 1.0, first paragraph, first sentence - The Notice states that the NEI Risk-Informed Technical Specification Task Force (RITSTF) submitted TSTF-427, Revision 1. That is incorrect. TSTF-427 (including the most recent version, Revision 2) was submitted by the Technical Specifications Task Force (TSTF), not the NEI RITSTF. Note that all Travelers are submitted by the TSTF, even if the Traveler is risk-informed and developed with the NEI Risk Informed Technical Specification Task Force.
2. Section 1.0 - The quote of the proposed LCO 3.0.9, first sentence, contains an extra word not in TSTF 427, Revision 2. It states, "...any affected supported system..." The word "affected" does not appear in TSTF-427 and should be removed. This same misquote appears in the last sentence of Section 1.
3. Section 2.0, first sentence, contains a typographical error. "TX" should be "TS." Note that this wording is correct on the NRC's website as ML061460020, but not in the published Notice.

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4. Section 2.0, second paragraph, first sentence - the definition of barriers is not consistent with TSTF-427, Revision 2. Specifically, the notice states, "mechanical devices," which was deleted from TSTF-427, Revision 2.
5. Section 3.0, first paragraph, fourth sentence - The date given for NEI 04-08 is incorrect. The correct date is March 2006, not November 2005. Note that Section 7.0, "References," provides the correct date.
6. Section 3.0, second paragraph, first sentence - There is a wording error. The sentence should state, "... can be assessed using the same approach ..." instead of "during the same approach." Note that this wording is correct on the NRC's website as ML061460020, but not in the published Notice.
7. Section 3.0, numbered item 2 - The last sentence is missing the verb. It should read, "The objective is to ensure that..." Note that this wording is correct on the NRC's website as ML061460020, but not in the published Notice.
8. Section 3.0, sixth paragraph, second sentence - There is a typographical error. The sentence states, "...barriers that are n not able to perform..." The extraneous "n" should be deleted. Note that this wording is correct on the NRC's website as ML061460020, but not in the published Notice.
9. Section 3.0, third paragraph from end, last sentence - This sentence references Section 3.3. The correct reference is Section 3.1.3.
10. Section 3.1.1, last paragraph before Table 2 - NUMARC 93-01 is misquoted. The Notice states, "...configuration that is associated with a CDF higher than 1E-03 should not be entered voluntarily." However, NUMARC 93-01, Section 11.3.7.2, states, "...CDF in excess of 10⁻³/year should be carefully considered before voluntarily entering such conditions. If such conditions are entered, it should be for very short periods of time and only with a clear detailed understanding of which events cause the risk level." The Notice wording should be revised. Note that Table 2 in the Notice correctly describes the NUMARC 93-01 guidance.
11. Section 3.1.1, Table 2 - The table uses the undefined term " ΔR_{CDF} ." This term should be defined.
12. Section 3.1.2, third paragraph - The following phrase is confusing, "...unplanned failures or discovered conditions may result in the unavailability of at least one train or subsystem for a particular initiating event." A clear statement of the intent is in Section 1.0, which states, "...if the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or..." The inoperability of the train that has the affected barrier is not the purpose of the 24-hour allowance - it is the inoperability of the opposite train. This phrase should be revised to be consistent with Section 1.0.

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13. Section 3.1.2, third paragraph - The Notice states, "Such conditions may result during application of LCO 3.0.9 from equipment failure on the operable train, or discovery of degraded barriers." The statement is technically correct but the last phrase is misleading. The 24-hour allowance is only used when the redundant train required to be operable by LCO 3.0.9 is found to be inoperable due to equipment failure or the failure of a barrier that protects the train from the same initiating event as the unavailable barrier on the first train. We recommend revising the sentence by replacing the last phrase with "...or discovery of a degraded barrier that protect all trains of a TS system from the same initiating event."
14. Section 3.1.3, second paragraph, first sentence - This sentence is incorrect when it states, "The implementation guidance for LCO 3.0.9 (Reference 2) requires that the risk determination for an unavailable barrier be performed per the ICCDP calculation as described in Section 3.1..." The implementation guidance clearly states in Section 6.2, Step 7, first paragraph, "(The user is not limited by the example used in the TSTF-427 technical justification.)." Furthermore, Appendix A of the implementation guidance provides an example of a risk assessment program for barriers using a site-specific on-line risk tool. The example uses the ICCDP equation only to calculate the allowed time, T_c . This sentence in the Notice should be revised to state, "The risk determination of an unavailable barrier is to be performed using the plant-specific configuration."
15. Section 3.1.3, third paragraph, second sentence - This sentence has a grammar error. It should state, "The numerical guidance identified in Table 2 is applicable to ..." not "are applicable to."
16. Section 3.1.3, next to the last paragraph, last sentence - The sentence is not correct. The CLIIP states, "...LERF, then the methodology requires a calculation for ICLERP similar to the calculations performed for ICCDP, described in Section 3.1, or the applicability of LCO 3.0.9 must be limited to that one barrier." This is inconsistent with TSTF-427, Section 4, and NEI 04-08, Section 6.2, Step 7.c, which states, "However, if the barrier protects a system that is significant to mitigation of containment bypass events, such as interfacing systems LOCA or steam generator tube rupture, assess the LERF impact using a qualitative, quantitative, or blended approach, If a quantitative assessment of the LERF impact cannot be made, the use of LCO 3.0.9 at a given time should be limited to a single barrier protecting a system that is significant to mitigation of containment bypass events." The Notice should be revised to be consistent with the Traveler and the implementation guidance document.
17. Section 3.2, Item 3, first paragraph, last sentence - This is an incomplete sentence. We recommend revising it to state "Unnecessary plant shutdowns may occur due to discovery of ..."
18. Section 3.2, next to the last paragraph, stipulation item 1 - Reference to NEI 04-08 should be eliminated. Commitment to NEI 04-08 is discussed in the next paragraph. Note that

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the commitments in the Model Application do not reference NEI 04-08 in the first commitment.

19. Section 3.2, last paragraph, stipulation item 2 - The paragraph states, "Licensee procedures must be revised to ensure that the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable..." NEI 04-08 is not the only acceptable methodology that may be used to perform the risk assessment required by LCO 3.0.9. As stated in Section 6.0 of NEI 04-08, the document "...describes considerations for risk assessment and management relative to the use of LCO 3.0.9." The document discusses acceptable methods of assessment in Section 6.1 and the general process for risk assessments in Section 6.2. We recommend revising the paragraph to state, "Licensee procedures must be revised to ensure that the guidance on the assessment and management of risk in NEI 04-08 is used whenever a barrier is considered unavailable..." The same change should be made to commitment 2 in Section 3.2, "Verification and Commitments," and in Enclosure 4 in the published Model Application.
20. Section 7.0, Reference 1 - Revise Reference 1 to refer to Revision 2 of TSTF-427, dated May 3, 2006.
21. Section 7.0, Reference 7 - For consistency, Reference 7 should list the May 2000 issuance date of Regulatory Guide 1.182.

Comments on the Proposed No-Significant-Hazards-Consideration Determination

1. Last paragraph - The Notice states, "Based upon the reasoning presented above and the previous discussion of the amendment request, the requested change does not involve a no-significant-hazards consideration." The use of the double negative is confusing. We recommend revising the sentence to state, "Based upon the reasoning presented above and the previous discussion of the amendment request, the requested change presents no significant hazards considerations under the standards set forth in 10 CFR 50.92(c)."

Comments on the Model Application

1. Enclosure 3, "Revised Technical Specification Pages," should be shown as optional. Many licensees do not provide retyped technical specification pages in their license amendment requests.
2. We recommend adding the Technical Specifications Branch Chief to the cc: list on the model application as has been done in other CLIIP model applications.