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**NRCREP - Comments on the July 27, 2007, Notice for Comment for TSTF-486, Rev. 2, "Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)"**

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**From:** "Brian Mann" <brianm@excelservices.com>  
**To:** <cliip@nrc.gov>  
**Date:** 08/27/2007 12:34 PM  
**Subject:** Comments on the July 27, 2007, Notice for Comment for TSTF-486, Rev. 2, "Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)"  
**CC:** "TSTF" <TSTF@excelservices.com>, <tjk1@nrc.gov>, <trt@nrc.gov>, "Matthew Hamm" <MEH1@nrc.gov>

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On behalf of the Technical Specifications Task Force (TSTF), we are providing the following comments on the July 27, 2007 Notice for Comment for TSTF-486, Rev. 2, "Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)."

Comments

- 1) Summary: The Summary states that the NRC staff has prepared a model safety evaluation (SE), model license amendment request, and a model no significant hazards consideration determination (NSHC). However, the last sentence of the section requests comments only on the model SE and model NSHC. Comments should also be requested on the model license amendment request as well.
- 2) Section 2.1 Proposed Change. Eighth bullet. This bullet describes digital SR 3.1.3.2, not analog SR 3.1.3.2 as stated.
- 3) Section 7.0 References, Reference 4. Change "Tevision" to "Revision."
- 4) Model Application: The third paragraph omits Attachment 5, which is shown in the list of Attachments below the signature.
- 5) Model Application: The Model Application states, "I declare under penalty of perjury under the laws of the United States of America that I am authorized by [LICENSEE] to make this request and that the foregoing is true and correct." This statement is not consistent with the recommended statement given in RIS 2001-18, "Requirements for Oath or Affirmation." RIS 2001-18 recommends the statement, "I declare [or certify, verify, state] under penalty of perjury that the foregoing is true and correct." Note that RIS 2001-18 states that this statement must be used verbatim. We recommend that the Model Application be revised to be consistent with RIS 2001-18.
- 6) Attachment 4: The regulatory commitment states "[LICENSEE] will establish the Technical Specification Bases for TS [3.1.3] as adopted with the applicable license amendment." This statement is incorrect as the Bases changes included for information with the license amendment request are not "adopted" with the license amendment. Bases changes are made under licensee control under the Technical Specification Bases Control Program as stated in the model Safety Evaluation. We recommend revising the commitment to state "[LICENSEE] will implement Technical Specification Bases for TS [3.1.3] consistent with those shown in the license amendment."
- 7) Model NSHC: To be consistent with 10 CFR 50.91(a), the title of Criterion 2 should be revised to add the

word "Accident" before "Previously Evaluated." Specifically, it should state, "The Proposed Change Does Not Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated."

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