



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 12, 1999

Mr. James Davis  
Nuclear Energy Institute  
1776 Eye Street, N. W.  
Suite 300  
Washington, DC 20006-2496

Dear Mr. Davis:

This is to inform you that disposition has been made on nine travelers containing proposed changes to the Standard Technical Specification (STS) NUREGs made by the NEI Technical Specification Task Force (TSTF). Those travelers that were Approved are TSTFs -222, R.1; -271, R.1; -285, R.1; -309, R.1; and -331. Those travelers that were Modified, after discussion with the respective Owner's Group Chairman, are TSTFs -058; -059; -107, R.3; and -269, R.1. Please see the enclosure for NRC comments with regard to the travelers that were Modified.

For your information, the following travelers are awaiting evaluation by a technical branch: TSTFs -051 (SPLB, MCEB, EICB, & OLPSB), -212, R.1 (EICB); -226 (SRXB), -262 (SRXB), -263, R.1 (SRXB), -264 (SRXB), -265 (SRXB), -287, R.2 (SPLB & SPSB); -313 (MCEB); and -315 (EICB).

Please contact me at (301) 415-1161 or e-mail [wdb@nrc.gov](mailto:wdb@nrc.gov) if you have any questions or need further information on these dispositions.

Sincerely,

A handwritten signature in black ink, appearing to read "W.D. Beckner", with a stylized flourish at the end.

William D. Beckner, Chief  
Technical Specifications Branch  
Associate Director for Projects  
Office of Nuclear Reactor Regulation

Handwritten initials "fn" in black ink, located to the left of the typed name.

Enclosures: As stated

cc: N. Clarkson, BWOG  
B. Ford, BWROG  
T. Weber, CEOG  
D. Bushbaum, WOG  
✓ D. Hoffman, EXCEL

## DISPOSITION SUMMARY

### TSTF-058: Modify

The staff has reviewed CE NPSD-995 in conjunction with plant-specific amendment requests from many of the CE plants. One licensee has been granted this AOT extension, but with additional requirements not proposed by this TSTF. The licensee was asked to commit to implementation of a Configuration Risk Management Program (CRMP) and to add a CRMP program description to the Administrative Control section of their technical specifications, in accordance with Regulatory Guide (RG) 1.177, 'An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications'. The staff's model CRMP can be found in Section 2.3.7 of RG 1.177.

The staff is currently considering alternatives to placing the CRMP in the TS. In addition, the Commission has directed the staff to support expeditious revisions to remove the CRMP from plant TS upon request by licensees after the Maintenance Rule (MR) revision is issued in final form. The staff expects the rule will be issued later this year. The staff believes it would be inefficient to propose adding the CRMP to the STS at this time, only to remove it at a later time when the MR is finalized. Therefore, the staff proposes that a reviewer's note be added to the proposed Condition A for STS 3.5.2. The reviewer's note should read something similar to the following, which is a paraphrase of RG. 1.177, Section 2.3.7.1:

"The adoption of this Condition is contingent upon implementation of a program to perform a contemporaneous assessment of the overall impact on safety of proposed plant configurations prior to performing and during performance of maintenance activities that remove equipment from service."

In addition, the staff believes that the last sentence in the proposed Bases for Action A is confusing. The sentence reads, "Reference 6 concluded that the overall risk impact to this Completion Time does not adversely affect risk." The staff suggests modifying this sentence to read something similar to, "Reference 6 concluded that extending the Completion Time for an inoperable LPSI train to 7 days provides plant operational flexibility while simultaneously reducing overall plant risk. This is because the risks incurred by having the LPSI train unavailable for a longer time at power will be substantially offset by the benefits associated with avoiding unnecessary plant transitions and by reducing risks during plant shutdown operations."

### TSTF-059: Modify

The staff has reviewed CE NPSD-994 in conjunction with plant-specific amendment requests from the majority of the CE plants. Four licensees have been granted this change under the risk-informed technical specification (RI-TS) pilot program. The staff is willing to approve the change to the STS based on the reviews done under the RI-TS pilot program with the Bases modifications discussed below.

In the proposed Bases for Action B.1, the first sentence states, "If one SIT is inoperable for reasons other than boron concentration or the inability to verify level or pressure, the SIT must be returned to OPERABLE status within 24 hours." The staff believes that the

phrase "or the inability to verify level or pressure" needs to be deleted, as there is not a separate condition for this form of inoperability in the STS. Alternatively, the TSTF could propose to add such a Condition. The staff has previously expressed support for such a change in Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation."

The staff takes exception to a statement made in the proposed Bases for Action B.1 and in the justification for this TSTF. The industry stated that "the best estimate analysis confirmed that during large break LOCA scenarios, core melt can be prevented by either operation of one LPSI pump or the operation of one HPSI pump and a single SIT." This statement was taken directly from CE NPSD-994, which cited a reference for the subject best estimate analysis. The staff has reviewed the best estimate analysis from the cited reference and believes that the purpose of the reference was to show that the best estimate code analyses for the typical PWR do not meet the criterion for core damage used in the IPE for that typical PWR (Zion) for a large break LOCA with those combinations of equipment. The staff believes it is misleading to say that this best estimate analysis confirmed that during large break LOCA scenarios, core melt can be prevented by either operation of one LPSI pump or the operation of one HPSI pump and a single SIT. The staff did not rely on this statement in its approval of the plant-specific amendments granted under the RI-TS pilot program. The staff requests that this statement be deleted from the proposed Bases for Action B.1 and from the justification for the TSTF.

TSTF-107, R.3: Modify

Recommend modification to the following:

BWOG LCO 3.1.4: After the added words "Each Control Rod..." add the words "shall be".

CEOG LCO 3.1.5: After the added words "All CEAs..." add the words "shall be" and make the bracketed portion a separate line item connected by capitalize "AND" so that there are three separate items in the LCO.

CEOG ACTIONS, CONDITION F: The added portion should only be "inoperable"; delete the portion that reads "for reasons other than Condition C or D". (The LCO has operability requirements on the motion inhibit and deviation and that is what Condition C and D address; Condition F need only address CEA operability.)

TSTF-269, R.1: Modify

The staff agrees that the proposed changes to the BWR/4 and BWR/6 SCIVs ACTIONS should be made. The same OG and staff justifications made in TSTF-269, Rev. 0 would apply here. However, the staff recommends two modifications to Rev. 1 for consistency purposes.

1. The staff disagrees with the modifications made to BWR/4 and BWR/6 STS SR 3.6.4.2.1. The proposed change would require, by administrative means, verification of all locked, sealed and otherwise secured SCIVs required to be closed on a 31 day frequency. TSTF-045 exempted the locked, sealed or otherwise secured required closed PCIVs from the 31 day or MODE 4/92 day verification surveillance (SR 3.6.1.3.3 and SR 3.6.1.3.4, respectively). The staff believes the

same criteria and justifications apply here. Therefore, the staff recommends that Inserts 5 and 6 be deleted. In their place, staff Insert 5 should be added and the modifications (see attachment) for SR 3.6.4.2.1 and its associated Bases should be made.

2. The staff believes that the proposed modifications to NUREG-1434 BWR/6 STS are incomplete. Using the same criteria and justifications in TSTF-269, Rev. 0 and Rev. 1 and TSTF-045, and item 1 above, similar changes should be made to BWR/6 STS 3.6.5.3 "Drywell Isolation Valve(s)" Required Action A.2 NOTES, SR 3.6.5.3.3 and their associated Bases (see attachment).

## TECHNICAL BRANCH NAMES AND ACRONYMS

### Division of Inspection Program Management (DRPM)

Operator Licensing, Human Performance & Plant Support Branch (OLPSB)

### Division of Engineering (DE)

Materials and Chemical Engineering Branch (EMCB)

Mechanical and Civil Engineering Branch (EMCB)

Electrical and Instrumentation Controls Branch (EICB)

### Division of Systems Safety and Analysis (DSSA)

Plant Systems Branch (SPLB)

Reactor Systems Branch (SRXB)

Probabilistic Safety Assessment Branch (SPSB)

STAFF INSERT 5

This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.2.1</p> <p>-----NOTES-----</p> <ol style="list-style-type: none"> <li>1. Valves and blind flanges in high radiation areas may be verified by use of administrative means.</li> <li>2. Not required to be met for SCIVs that are open under administrative controls.</li> </ol> <p>-----</p> <p>Verify each secondary containment isolation manual valve and blind flange that is required to be closed during accident conditions is closed.</p>	<p>31 days</p>
<p>SR 3.6.4.2.2</p> <p>Verify the isolation time of each power operated and each automatic SCIV is within limits.</p>	<p>In accordance with the Inservice Testing Program or 92 days</p>
<p>SR 3.6.4.2.3</p> <p>Verify each automatic SCIV actuates to the isolation position on an actual or simulated actuation signal.</p>	<p>[18] months</p>

NOT LOCKED,  
SEALED, OR  
OTHERWISE  
SECURED AND

## BASES (continued)

SURVEILLANCE  
REQUIREMENTSSR 3.6.4.2.1NOT LOCKED,  
SEALED OR  
OTHERWISE  
SECURED  
AND

This SR verifies that each secondary containment manual isolation valve and blind flange that is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the [secondary] containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification that those SCIVs in [secondary] containment that are capable of being mispositioned are in the correct position.

Since these SCIVs are readily accessible to personnel during normal operation and verification of their position is relatively easy, the 31 day Frequency was chosen to provide added assurance that the SCIVs are in the correct positions. ↑

NRC  
INSERT 5

Two Notes have been added to this SR. The first Note applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these SCIVs, once they have been verified to be in the proper position, is low.

A second Note has been included to clarify that SCIVs that are open under administrative controls are not required to meet the SR during the time the SCIVs are open.

SR 3.6.4.2.2

Verifying that the isolation time of each power operated and each automatic SCIV is within limits is required to demonstrate OPERABILITY. The isolation time test ensures that the SCIV will isolate in a time period less than or equal to that assumed in the safety analyses. The isolation time and Frequency of this SR are [in accordance with the Inservice Testing Program or 92 days].

(continued)



## SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.4.2.1</p> <p style="text-align: center;">-----NOTES-----</p> <p>1. Valves and blind flanges in high radiation areas may be verified by use of administrative controls.</p> <p>2. Not required to be met for SCIVs that are open under administrative means.</p> <p>-----</p> <p>Verify each secondary containment isolation manual valve and blind flange that is required to be closed during accident conditions is closed.</p>	<p>31 days</p>
<p>SR 3.6.4.2.2</p> <p>Verify the isolation time of each power operated and each automatic SCIV is within limits.</p>	<p>In accordance with the Inservice Testing Program or 92 days</p>
<p>SR 3.6.4.2.3</p> <p>Verify each automatic SCIV actuates to the isolation position on an actual or simulated automatic isolation signal.</p>	<p>[18] months</p>

NOT LOCKED,  
SEALED, OR  
OTHERWISE  
SECURED AND

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. (continued)</p> <p>ISITF INSERT 1</p>	<p>A.2 -----NOTE-----            (1.) Isolation devices in high radiation areas may be verified by use of administrative means.</p> <p>Verify the affected penetration flow path is isolated.</p>	<p>Prior to entering MODE 2 or 3 from MODE 4, if not performed within the previous 92 days</p>
<p>B. -----NOTE-----            Only applicable to penetration flow paths with two isolation valves.</p> <p>One or more penetration flow paths with two drywell isolation valves inoperable.</p>	<p>B.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured.</p>	<p>4 hours</p>
<p>C. Required Action and associated Completion Time not met.</p>	<p>C.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>C.2 Be in MODE 4.</p>	<p>12 hours</p> <p>36 hours</p>

## SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.6.5.3.1    Verify each [ ] inch drywell purge isolation valve is sealed closed.	31 days
SR 3.6.5.3.2    -----NOTE----- Not required to be met when the drywell purge supply or exhaust valves are open for pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open [provided the [20] inch containment [purge system supply and exhaust] lines are isolated]. ----- Verify each [20] inch drywell purge isolation valve is closed.	31 days
SR 3.6.5.3.3    -----NOTE----- Not required to be met for drywell isolation valves that are open under administrative controls. ----- Verify each drywell isolation manual valve and blind flange that is required to be closed during accident conditions is closed.	Prior to entering MODE 2 or 3 from MODE 4, if not performed in the previous 92 days

NOT LOCKED,  
SEALED, OR  
OTHERWISE  
SECURED  
AND

(continued)

## BASES (continued)

SURVEILLANCE  
REQUIREMENTSSR 3.6.4.2.1

NOT LOCKED,  
SEALED OR  
OTHERWISE  
SECURED AND

This SR verifies each secondary containment isolation manual valve and blind flange that is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the [secondary containment] boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification that those SCIVs in [secondary containment] that are capable of being mispositioned are in the correct position.

Since these SCIVs are readily accessible to personnel during normal unit operation and verification of their position is relatively easy, the 31 day Frequency was chosen to provide added assurance that the SCIVs are in the correct positions.

Two Notes have been added to this SR. The first Note applies to valves and blind flanges located in high radiation areas and allows them to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these SCIVs, once they have been verified to be in the proper position, is low.

↑  
NRC  
INSERT 5

A second Note has been included to clarify that SCIVs that are open under administrative controls are not required to meet the SR during the time the SCIVs are open.

SR 3.6.4.2.2

Verifying the isolation time of each power operated and each automatic SCIV is within limits is required to demonstrate OPERABILITY. The isolation time test ensures that the SCIV will isolate in a time period less than or equal to that assumed in the safety analyses. The isolation time and Frequency of this SR are [in accordance with the Inservice Testing Program or 92 days].

(continued)

## BASES

## ACTIONS

A.1 and A.2 (continued)

being mispositioned are in the correct position. Since these devices are inside primary containment, the time period specified as "prior to entering MODE 2 or 3 from MODE 4, if not performed within the previous 92 days," is based on engineering judgment and is considered reasonable in view of the inaccessibility of the devices and other administrative controls that will ensure that device misalignment is an unlikely possibility. Also, this Completion Time is consistent with the Completion Time specified for PCIVs in LCO 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)."

Required Action A.2 is modified by <sup>TWO</sup> ~~Note~~ <sup>5</sup> ~~that~~ <sup>NOTE 1</sup> applies to isolation devices located in high radiation areas and allows them to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable, since access to these areas is typically restricted. <sup>TSIE</sup> <sup>INSERT 2</sup> Therefore, the probability of misalignment once they have been verified to be in the proper position, is low.

B.1

With one or more penetration flow paths with two drywell isolation valves inoperable, the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic valve, a closed manual valve, a blind flange, and a check valve with flow through the valve secured. The 4 hour Completion Time is acceptable, since the drywell design bypass leakage  $A/\sqrt{k}$  of [1.0] ft<sup>3</sup> is maintained due to application of ACTIONS Note 4. The Completion Time is reasonable, considering the time required to isolate the penetration, and the probability of a DBA, which requires the drywell isolation valves to close, occurring during this short time is very low.

Condition B is modified by a Note indicating this Condition is only applicable to penetration flow paths with two isolation valves. For penetration flow paths with one

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