



U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation

NRR OFFICE INSTRUCTION

Change Notice

Office Instruction No.: LIC-601, Revision 0

Office Instruction Title: Improved Technical Specification Conversion
Amendment Review Procedures

Effective Date: June 18, 2012

Approved By: Daniel H. Dorman

Date Approved: June 14, 2012

Primary Contact: Kristy Bucholtz
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Responsible Organization: NRR/DSS

Summary of Changes: This is the initial issuance of LIC-601. The objective of this office instruction is to define the process for review of Improved Technical Specification Conversion Amendments.

Training: Required reading for STSB staff, DORL project managers, and other technical staff prior to engaging in technical specification conversion activities.

ADAMS Accession No.: ML092040272



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NRR OFFICE INSTRUCTION
LIC-601
Improved Technical Specification Conversion Amendment Review Procedures

1. POLICY

Section 182a of the Atomic Energy Act (the “Act”) requires applicants for nuclear power plant operating licenses to include technical specifications (TS) as part of the license. The Commission’s regulatory requirements related to the content of TS are stated in Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36, “Technical specifications.”

Starting in the late 1980s, NRC and industry representatives sought to develop guidelines for improving the content and quality of nuclear power plant TS. This led to the development of the Improved Standard TS (ISTS) and a revised 10 CFR 50.36. On July 22, 1993, the Commission issued its Final Policy Statement on 10 CFR 50.36, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement described the safety benefits of the ISTS and encouraged licensees to use the ISTS as the basis for plant-specific TS amendments and for complete conversions to Improved Technical Specifications (ITS) based on the ISTS.

This guidance supplements the guidance found in LIC-101, “License Amendment Review Procedures,” and should be utilized to the greatest extent possible during the review of ITS Conversion amendments.

2. OBJECTIVES

The overall objective of an ITS Conversion, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline a Licensee’s TS to provide more readily understandable requirements that help ensure safer operation of the unit, while satisfying the requirements of 10 CFR 50.36. This provides as much consistency in the license requirements as possible, to the extent that the plant-specific design basis can conform with the related improved standard technical specification (ISTS). The objective of this Office Instruction is to supplement guidance found in LIC-101, “License Amendment Review Procedures,” in order to ensure that the overall objectives of an ITS Conversion are met.

3. BACKGROUND

LIC-101, “License Amendment Review Procedures,” contains the general guidance for the review of license amendments. ITS Conversions are complex amendments that require additional specific guidance in order to ensure that high quality reviews are conducted in a timely manner. While practices have been in place for reviewing ITS Conversion amendments, there has been no formal documentation of the specific processes used. Without formal documentation, varying practices can be employed leading to inconsistent or inefficient reviews. This Office Instruction documents the practices that have been in place for ITS Conversion reviews. This Office Instruction, when used in conjunction with LIC-101, “License Amendment Review Procedures,” will ensure that a safe and efficient ITS Conversion review takes place.

4. BASIC REQUIREMENTS

Basic requirements listed in LIC-101, "License Amendment Review Procedures," apply to ITS Conversion amendments. This Office Instruction provides additional information on pre-submittal meetings, work planning, acceptance reviews, main reviews, Request for Additional Information (RAI) resolution, Safety Evaluation (SE) write-ups, and other close-out activities associated with an ITS Conversion amendment.

4.1 Pre-Submittal Meetings

Due to the complexity of ITS Conversions, pre-submittal meetings between NRC staff and the licensee are highly encouraged. The meetings should cover the expected review schedule, the ITS Conversion process, and the NRC staff should discuss any lessons learned from previous ITS Conversions. An example of a pre-submittal brief from a previous ITS Conversion can be found in ADAMS (ML092040269) -

<https://adamsxt.nrc.gov/WorkplaceXT/getContent?id=current&vsId=%7B42113B05-0D8C-45F9-B2F2-30F4383A339D%7D&objectStoreName=Main...Library&objectType=document>.

To maximize the benefit of pre-submittal meetings, meetings should take place prior to the licensee developing a submittal. This would ensure common understanding of the ITS Conversion process and would therefore allow for a more efficient use of NRC resources. Participants in the pre-submittal meeting should include but not be limited to: the licensee, Division of Operating Reactor Licensing (DORL) project manager (PM), Technical Specifications Branch (STSB) PM, STSB reviewers and Technical Branch reviewers

4.2 Work Planning

Every TS Conversion is, by definition, unique since the starting point will always be site-specific. In addition, resources and competing workload items must also be taken into consideration. Subject to these variables, the LIC-101 licensing action timeliness goal is reasonable assuming: a submission with few or no items requiring extensive formal review by branches other than STSB, and few or no items beyond the scope of the existing ISTS, such as licensing basis changes, incorporated in the conversion. For example, inclusion of deviations from NRC-approved Technical Specification Task Force (TSTF) travelers, presents significant schedule risk to the project.

As an example only, a schedule for a conversion may proceed as follows:

Acceptance / Initial Review Phase
Main Review Phase
Issue Resolution and Submission of Revisions by Licensee
SE Preparation, Document Routing, and Issuance

Each ITS Conversion amendment contains "in-scope" changes and may contain a list of changes that identify the need for a possible formal technical branch review. "In-scope" items consist of changes that either maintain the Current TS (CTS) or adopt the most recent revision of the ISTS, as applicable to the plant's

current licensing basis. Although any technical branch may sign into the ITS Conversion review, “in-scope” changes are typically only formally reviewed by STSB staff. Since a majority of the work is typically performed by STSB staff, an STSB Project Manager PM is assigned to coordinate STSB efforts and interface with the DORL PM.

The submittal should contain a list of self-identified items which may require a formal technical branch review. The DORL PM will work with STSB staff to determine which licensee identified items actually do require a formal technical branch review. These typically represent changes that differ from both the CTS and the ISTS, and may represent a change to the plant’s design basis being incorporated into the conversion application.

These items should be assigned to the appropriate technical branch for review immediately upon receipt of the amendment request, and an acceptance review of that portion of the LAR requested. Appendix B contains examples of items that may require a formal technical branch review. These changes may affect timely completion of the review of a conversion amendment.

4.3 Acceptance Review

Basic requirements listed in LIC-109, “Acceptance Review Procedures,” apply to ITS Conversion amendments. During the course of this review, a goal for the STSB reviewer is to quickly identify issues that will require input (formal or informal) from a technical branch other than STSB. Their input should be solicited immediately to allow this tasking to be accomplished in a timely fashion so as to accommodate the overall schedule for the conversion.

While not a complete list, the following are typical “red flags” that a proposed change may require additional review:

- Deviations from the ISTS, or ISTS Bases
- Relocated LCOs and removed requirements
- CTS changes that are consistent with the ISTS, but require the licensee to make a change to plant design or analyses

Similar to self-identified items discussed in 4.2 above, these NRC-identified items may be assigned a TAC and have Green Sheets routed by the DORL PM as appropriate. Due dates requested for RAI’s and SE’s should be appropriate to the overall conversion schedule. Late identification of issues requiring technical branch input have been the cause of significant delays of past conversions due to workload issues within the technical branches solicited for input.

The Notice of Consideration of Issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Consideration Determination, and Opportunity for a Hearing should be published with instructions on how members of the public can access the request for additional information database within 60 days after issuance of the acceptance review.

4.3.1 Initial Oath or Affirmation Submittal

The submittal for each TS section is typically broken down for each LCO as follows:

- CTS which contains markup of changes
- Discussion of Changes (DOC) – Categorizes each CTS change
- ISTS which contains markup of changes
- ISTS Justification for Deviation – Discusses why the ISTS model was not adopted (not required)
- ISTS Bases which contains markup of changes
- ISTS Bases Justification for Deviation - Discusses why the ISTS model was not adopted (not required)
- Specific No Significant Hazards Determination (NSHD)

The DOC Table typically has five categories of changes. They are:

- Administrative (A) - Changes to the CTS that do not result in new requirements or change operational restrictions and flexibility.
- More Restrictive (M) - Changes to the CTS that result in added restrictions or reduced flexibility.
- Less Restrictive (L) - Changes to the CTS that result in reduced restrictions or added flexibility, usually are divided up into “Categories.” Depending on the types of changes, “Category” titles can differ from one ITS Conversion to another.
- Removed Details (LA) - Changes to the CTS that eliminate detail and relocate the detail to a licensee-controlled document. Typically, this involves details of system design and system description including design limits, description of system operation, procedural details for meeting TS requirements or reporting requirements, and cycle-specific parameter limits and TS requirements redundantly located in other licensee-controlled documents. LAs are usually divided into sub-categories known as “Types.” Depending on the types of changes, “Type” titles can differ from one ITS Conversion to another.
- Relocated Specifications (R) - Changes to the CTS that relocate LCO requirements that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii).

The submittal will also contain a generic NSHD. The submittal may contain regulatory commitments, license conditions, and a list of identified items which may require a formal technical branch review.

An example of a previous ITS Conversion amendment submittal can be found in ADAMS (ML072200448) - <https://adamsxt.nrc.gov/WorkplaceXT/getContent?id=current&vsId=%7BB6960667-2F30-48E7-A860-2FA5F92D06E1%7D&objectStoreName=Main...Library&objectType=document>. The intent of the example is only to demonstrate the layout of a typical ITS Conversion amendment.

4.3.2 Information Not Provided Under Oath or Affirmation

Historically, the licensee has also initially provided searchable, MS Word or Adobe Acrobat versions of:

- Clean typed ITS and ITS Bases
- CTS and CTS Bases
- UFSAR
- DOC Tables (MS Word file)

These items are not provided under oath or affirmation, but are provided for reviewer benefit. The NRC reviewer is responsible for ensuring that any information used in making a decision is submitted under oath or affirmation or available on the docket.

DOC Tables are to be used during the write-up of the SE. The word file of the DOC Table is a summary version of the DOC Table that is in the formal application. STSB reviewers should confirm the acceptability of the word file or re-write as needed during the course of the review.

4.3.3 Acceptance / Initial Review Meeting

Approximately 30 days from when the amendment is submitted, a meeting with the licensee should be conducted to discuss any potential impacts to the schedule due to issues found during the Acceptance / Initial Review Period.

If an item is identified during the review process that may require significant or formal participation of a technical branch, and this item was not self-identified in the submittal, the licensee should be informed prior to engaging a technical branch. This courtesy is provided to allow the licensee to decide whether or not to pursue the issue in light of the potential schedule or cost impact they may incur.

4.4 Main Review

The main review is a continuation of the review started in the acceptance phase. It consists of the NRC reviewing the entire application and having all initial RAIs drafted. A timeframe of 5 months is typically scheduled for the main review. The review of the ITS Conversion amendment and the development of RAIs is similar

in nature to other amendments that are processed by the NRC. One big difference is that the “in-scope” changes are typically only reviewed by STSB staff. Information resources available to support the review include, but are not limited to:

- 10 CFR 50.36
- ISTS
- CTS
- UFSAR
- LIC-101
- Regulatory Guides
- Standard Review Plans
- Informal communications with technical branch staff
- Communications with licensee via PM for obtaining clarification

During the course of the review, regular communications are vital. This includes communications between the STSB project lead, the DORL PM, and the relevant technical branches, as well as between NRC Staff and the Licensee team. For example, a weekly teleconference should be established to allow early communication of schedule issues, and clarifications or notification of technical issues that may be, or have been, issued as questions or RAI's.

For complex issues, a site visit may be utilized to provide a face-to-face venue to facilitate discussions between cognizant NRC technical reviewers and licensee staff allowing a focused effort on, and improved mutual understanding of, the issues of concern to the staff. This may be either at NRC or licensee facilities. Since these working sessions are typically used to clarify or explain material already on the docket, they may not need to be public meetings. The decision on whether the meeting should be public or not should be made after consultation with the DORL PM.

4.4.1 RAI Communications & Use of an ITS Database

All RAIs developed should reference applicable regulatory criteria and/or provide the technical basis for the question. If applicable, RAIs should discuss the ITS proposal with regards to the CTS and the ISTS.

For previous ITS Conversions, RAI-like communications between the NRC and the licensee have taken place in an ITS database that was accessible via a licensee controlled, publically available, external website. Although use of the ITS database is not required, when used properly, it can facilitate the flow of communications and thereby reduce scheduling time. Licensee communications on the ITS database are not done under oath or affirmation. As a result, after all issues are resolved, the licensee will submit the exact contents of the database to the NRC under oath or affirmation. Any teleconference communications with the licensee that are pertinent to RAI resolution should be captured in the database discussions. Before taking part in an ITS Conversion, training should be provided to the NRC staff on how to use the ITS database. This training

is typically provided by the licensee and discusses how to navigate the site.

Although the ITS database provides an alternate way for communications, all dialog is immediately available to the public, and will eventually be placed on the docket (when submitted under oath and affirmation by the licensee). As a result, both the licensee and NRC staff should treat the database with some formality (i.e. do not communicate anything that would not normally be communicated in an RAI or RAI response). RAIs written by NRC staff shall be approved by a NRC supervisor before being placed in the ITS database.

In order to minimize the overloading of NRC and licensee resources, RAIs should be posted on the ITS database as soon as they are available, rather than in batches as a TS Section is completed. Goals are for the licensee to provide an RAI response within 2 weeks and for NRC reviewers to process responses within 2 weeks. Both parties should inform each other if the 2 weeks is likely to be exceeded. Status of these items is a frequent topic at the weekly teleconference call.

ITS database items, including the original question, and one or several rounds or responses, should be annotated and closed out by NRC staff when the licensee provides an acceptable response. The licensee should provide a mark-up of proposed changes with the database item before it is closed out by NRC staff. After closeout, if for some reason the issue needs to be revisited, a new item can be opened if needed. The licensee should be kept informed of such actions.

An RAI in the database should be elevated to a written formal RAI if:

- Dialogue on an issue has exceeded 3 iterations and the reviewer believes that resolution via the database process is unlikely or
- If, after even the first response, the reviewer believes that, due to the nature of the response, resolution is not likely in a timely manner.

An example of ITS database items that have been submitted under oath or affirmation after issues have been resolved can be found in ADAMS (ML081430105). In some of these documents, database items that include an initial question and subsequent replies have been referred to as "threads".

The Notice of Consideration of Issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Consideration Determination, and Opportunity for a Hearing should be published with instructions on how members of the public can access the RAI database.

4.5 Issue Resolution & Submittal of Revisions

After the main review is complete and all initial RAIs have been posted, the focus of the ITS Conversion involves resolving remaining issues. This portion of the schedule is the most volatile and typically needs to be managed closely. A goal is to have all issues resolved within 4 months after completing the main review.

In order to reduce scheduling time later in the ITS Conversion, any SE inputs needed from technical branches can be provided to the DORL PM as specific issues are closed out. STSB staff should be cognizant of technical branch SE inputs and should be aware of any new issues that may invalidate the SE.

Once all RAIs are resolved, the licensee should:

- Submit all revised submittals under oath or affirmation
- Submit the exact contents of the ITS database under oath or affirmation
- Submit revised word file DOC Tables

The items should be submitted as each TS Section is closed out. The revised submittals should contain a table that provides a summary of all changes. The summary should reference the applicable ITS database items, as well as how the revision relates to the ITS database discussions (i.e. no change, editorial, new regulatory/technical change). Without this table, there will likely be a delay in scheduling due to the need to provide a more detailed verification of the revised submittal.

Example of editorial change: There is an ITS database item discussion on LCO 3.4.5 and the item is closed out with expected revision changes. Due to resolutions in other items, the LCO will now need to be renumbered as LCO 3.4.4. The revised submittal should classify the change from the ITS database item as editorial with discussion of why the change occurred. Note: Revisions to writing for the purpose of clarifying intent are not necessarily editorial changes.

Example of regulatory/technical change: There is an ITS database item discussion with an expected revision change that states an LCO is applicable in Modes 1, 2, and 3. However, when the actual revision is submitted, the LCO will now only be applicable in Modes 1 and 2. The revised submittal should classify this as a new regulatory/technical change. The revised submittal should provide regulatory and technical justification as well as why the change occurred.

The licensee should be informed that the addition of new regulatory/technical changes in revised submittals is highly discouraged by the NRC. New changes may need to go back to technical branches for formal review and can greatly impact the schedule. Prior to a revision submittal, if the licensee desires a change after an item is closed out, or desires a completely new change, the NRC staff can create a new item to facilitate such discussions. The licensee should be aware that this too can impact scheduling; however it is the preferred method when compared to providing new regulatory/technical changes in a revised submittal.

The revised submittals should also explicitly state if a commitment or a condition has been added, modified, or deleted. This information will be needed for the NRC SE.

4.6 SE Write-Up

STSB is responsible for drafting the "in-scope" portion of the SE. The "in-scope" portion of the SE can be drafted by the STSB PM if other STSB members:

- Provide confirmation that the word file DOC Tables are acceptable
- Provide confirmation that revised submittals are acceptable (i.e. TS Section closed out and all issues resolved)

The DORL PM will consolidate other portions of the SE that are not directly related to the "in-scope" evaluations. This includes SEs provided by other technical branches. STSB staff should inform the DORL PM if technical branch SEs are no longer applicable due to revised submittals.

Example: Licensee proposed a change that was different from the CTS and ISTS. The technical branch accepted the change and drafted a SE during the issue resolution phase. However, when the revision was submitted in the end, the licensee decided to go with the ISTS.

The DORL PM will also arrange for a panel of senior project managers to conduct a review of the summary DOC tables that will be included as part of the STSB SE. The purpose of this review is to provide an independent confirmation that the changes are appropriately categorized (i.e. Less Restrictive, Administrative, etc.). This is important because the structure of the conversion SE provides for the approval of changes by category, rather than individually.

An example of an ITS Conversion SE can be found in ADAMS (ML082900616).

4.7 Capturing Lessons Learned

After each ITS Conversion, the STSB PM should consolidate any lessons learned. Consideration should be given to updating this Office Instruction to reflect any lessons learned or incorporating the lessons learned into an Appendix of this Office Instruction.

5. RESPONSIBILITIES AND AUTHORITIES

Responsibilities and authorities listed in LIC-101, "License Amendment Review Procedures," apply to ITS Conversion amendments. This Office Instruction lists additional responsibilities and authorities for ITS Conversion amendments. Clarification of the DORL PM and STSB PM roles is also provided.

DORL PM

- Responsible for the overall ITS Conversion effort.
- Responsible for the coordination of any meetings with the licensee.
- Responsible for Work Planning processing.
- Responsible for convening a DORL PM panel to review DOCs

STSB PM

- Interfaces with DORL PM by coordinating STSB efforts.
- Draft the STSB SE based on input from STSB reviewers
- Documents any lessons learned / updates LIC-601 as needed.

STSB Reviewers

- Assist in Work Planning processing.
- Conduct review of entire application.

Technical Branch Reviewers

- Conduct formal review of items and provide SE input as requested by DORL PM
- Provide informal assistance to STSB reviewers as requested by STSB.

6. PERFORMANCE MEASURES

None

7. PRIMARY CONTACT

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8. RESPONSIBLE ORGANIZATION

NRR/DSS

9. EFFECTIVE DATE

June 18, 2012

10. REFERENCES

- Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, July 22, 1993 (58 FR 39132)
- NEI 96-06, "Improved Technical Specifications Conversion Guidance" (ADAMS No. ML070810523)
- NRC Administrative Letter 96-04, "Efficient Adoption of Improved Standard Technical Specifications" (ADAMS No. ML031110087)
- LIC 101, "License Amendment Review Procedures"

Enclosures:

1. Appendix A - Change History
2. Appendix B - Items that May Require a Formal Technical Branch Review

Appendix A - Change History

Office Instruction LIC-601

Improved Technical Specification Conversion Amendment Review Procedures

LIC-601 Change History - Page 1 of 1			
Date	Description of Changes	Method Used to Announce & Distribute	Training
06/14/12	Initial issuance. The objective of this office instruction is to define the process for review of Improved Technical Specification Conversion Amendments.	E-mail to NRR staff	Required reading for STSB staff, DORL project managers, and other technical staff prior to engaging in technical specification conversion activities.

Appendix B - Items that May Require a Formal Technical Branch Review

Office Instruction LIC-601

Improved Technical Specification Conversion Amendment Review Procedures

Items which may require a formal technical branch review, which are later identified by STSB staff rather than the licensee at the start, can potentially impact the schedule. This is due to the need for formal technical branch engagement late in the main review phase.

The following items are examples of changes that may require a formal technical branch review. Typically the licensee would be expected to identify these items in the initial submittal. Examples are listed for demonstrative purposes only.

1. ITS that are different from CTS and ISTS (regardless of reasoning or extent of modification). This type of change has historically been referred to as a "Beyond Scope Item" or BSI.

Example: Both the CTS and the ISTS contain LCOs for Anticipatory Reactor Trip System (ARTS) Instrumentation. The licensee is proposing to delete ARTS from the ITS.

2. Modification of ITS Bases in such a manner that application of TS may be affected (i.e. discussions on Operability, modification of generic ISTS Bases discussion, etc.)

Example #1: CTS states that for Applicable Modes, 2 channels per bus (4 total channels) shall be operable for the Emergency Diesel Generator (EDG) Loss of Power Start (LOPS) instrumentation. The CTS Bases do not provide any additional discussion on what constitutes an operable channel. The ITS contains the same CTS statement, however the ITS Bases defines an operable channel in a manner that is inconsistent with the UFSAR design. The ISTS cannot be used as a reference since it is based on a different design (i.e. 3 channels per EDG).

Example #2: The CTS, ITS, and ISTS contain a Surveillance Requirement (SR) for calibration of the Source Range Neutron Flux instrumentation. The wording in the CTS, ITS, and ISTS is the same. The CTS Bases and the UFSAR do not provide any additional discussion on the SR. The ISTS Bases discussion states "For source range neutron flux channels, Channel Calibration is a complete check and readjustment of the channels from the **preamplifier input** to the indicators." The ITS Bases modifies this discussion to state "For source range neutron flux channels, Channel Calibration is a complete check and readjustment of the channels from the **RPS Cabinet input** to the indicators." The ITS Bases modification was done to clarify that the SR would not require testing of the preamplifier.

3. Adoption of ISTS or any TSTF Traveler that requires a plant-specific analysis (i.e. adoption of term "recently irradiated fuel" in TSTF-51/ISTS, PRA analysis in TSTF-411/418/ISTS, etc). The appearance of a bracketed term "[]" can be an indication that plant-specific analysis is needed. For plant-specific analysis that already exists, formal technical branch review may still be needed to verify that the analysis is applicable to the TS in question.

Example: The CTS states that the Containment Ventilation Isolation instrumentation needs to be operable during the movement of **irradiated** fuel within the containment. The ITS proposes that the Containment Ventilation Isolation instrumentation needs to be operable

during the movement of **recently irradiated** fuel within the containment. The ISTS states, in part, that the Containment Ventilation Isolation instrumentation is applicable during movement of [recently] irradiated fuel within the containment. A plant-specific analysis, in this case, is performed and reviewed for adoption of the term “recently.”

4. Adoption of TSTF Travelers that have not been incorporated into the latest ISTS revision and require formal technical branch review (can usually be identified by the lack of a CLIIP model SE or the need for evaluation of plant-specific information).
5. Partial adoption of any TSTF Traveler (i.e. not adopting conditions / commitments in TSTF Traveler).

Example: The licensee proposes to adopt the “recently” irradiated fuel term in the ITS. The use of the term “recently” irradiated fuel is associated with TSTF-51 and is incorporated into the ISTS, Revision 3.0. TSTF-51 contained regulatory commitments associated with adoption of the term “recently” irradiated fuel. The licensee does not propose to adopt any of the commitments associated with TSTF-51.

6. ITS attempts to adopt ISTS when ISTS may not apply due to the plant-specific UFSAR (i.e. deleting CTS simply because it is not found in the ISTS). The ISTS is a model and the ITS should reflect the design of the facility. These types of changes should not be proposed by the licensee.

Example: In the Emergency Feedwater (EFW) CTS, there is a SR associated with the EFW Automatic Level Control System. The UFSAR states that the level control system is required for mitigation of an accident. The EFW ISTS do not contain any SR associated with an EFW Automatic Level Control System. The licensee proposes to delete the EFW Automatic Level Control System SR from the CTS with the main justification being that the SR was not found in the ISTS.

The following items are changes that would likely require a formal technical branch review. The licensee may not foresee these issues (i.e. not expected to identify). Examples are listed for demonstrative purposes only.

1. The ITS retains portions of the CTS that deviate significantly from the ISTS, and the licensing basis in terms of technical evaluation / regulatory compliance is unclear. When contentious issues with CTS retention cannot be resolved, resolution has typically been to have the ITS reflect the CTS (i.e. only an administrative format change occurs for the TS LCO in question).

Example #1: The CTS state that the control room emergency ventilation is required to be operable during power operations and during movement of irradiated fuel in the reactor building. The ITS proposes that the control room emergency ventilation should be operable during power operations and during movement of recently irradiated fuel in the reactor building. The UFSAR states that the control room emergency ventilation is needed to mitigate the consequences of a LOCA. Neither the CTS nor the ITS contain requirements that the control room emergency ventilation be operable during Hot Shutdown. Accordingly, formal technical branch review would be needed to determine if the control room emergency ventilation is required to be operable during Hot Shutdown. For equipment needed to mitigate the consequences of a LOCA, the ISTS typically has operability requirements in Hot Shutdown.

Example #2: The CTS state that if the control room emergency ventilation is made or found to be inoperable for any reason, reactor operation or **refueling operations** is permissible for seven days, after which the reactor shall be placed in Cold Shutdown within 36 hours and refueling operations must be terminated within 2 hours. For the plant in question, due to plant specific designs, this could lead to a potential loss of safety function during these time periods. As a result of modifying the LCO, the ITS proposed to modify the remedial action by replacing the term “refueling operations” with “**recently irradiated fuel handling, irradiated fuel cask handling, and Operations with the Potential to Drain the Reactor Vessel (OPDRV)**.” The completion times associated with an inoperable control room emergency ventilation were maintained. For two inoperable control emergency ventilation systems (complete loss of safety function), the ISTS has actions to immediately shutdown and cooldown in accordance with ISTS LCO 3.0.3 (exceptions to this are listed for inoperability due to the control room envelope boundary) and immediately suspend movement of fuel assemblies. Formal technical branch review would be needed, in this case, to determine the acceptability of the ITS proposed alternative.

2. ITS proposes to adopt the ISTS, however new issues associated with ISTS have been identified. This occurs usually as a result of new staff looking at ISTS and identifying potential issues that were not considered before.

Example: TSTF-360 contains provisions for Electrical DC Systems and was incorporated into the ISTS. The technical branch identified issues with TSTF-360 / ISTS.