

July 4, 2012

TSTF-12-13
PROJ0753

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Response to NRC Request to Revise TSTF Traveler Model Applications

At the May 8, 2012 public meeting between the Technical Specifications Task Force (TSTF) and the Nuclear Regulatory Commission (NRC) staff, the NRC discussed a concern with TSTF Traveler model applications.

Many Travelers discuss the 10 CFR 50, Appendix A General Design Criteria (GDC) in the "Regulatory Evaluation" section of the Traveler justification. Similar statements are often made in the NRC model Safety Evaluation (SE) for Travelers. The model application for a Traveler, used by licensees to submit a License Amendment Request (LAR) to adopt the change, states the licensee has reviewed the Traveler and the model SE and they are applicable to the plant. However, this creates an inconsistency because many plants were licensed before the 10 CFR 50, Appendix A GDC were published. These licensees are committed to other design criteria.

To resolve this inconsistency, the TSTF proposes the following steps:

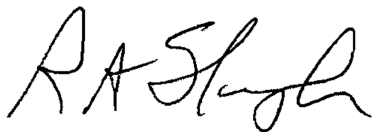
1. Future Travelers will continue to discuss the 10 CFR 50 Appendix A GDC, as needed.
2. Future Traveler model applications for Travelers that discuss the GDC will instruct licensees that are not licensed to the 10 CFR 50, Appendix A GDC to discuss in the LAR their plant-specific licensing basis that is equivalent to the GDC referenced in the Traveler. For example, the model application will contain text similar to the following:

"The Traveler and model Safety Evaluation discuss the applicable regulatory requirements and guidance, including the 10 CFR 50, Appendix A, General Design Criteria (GDC). [PLANT] was not licensed to the 10 CFR 50, Appendix A, GDC. The [PLANT] equivalent of the referenced GDC are [REFERENCE INCLUDING UFSAR LOCATION, IF APPLICABLE]. [DISCUSS THE EQUIVALENCE OF THE REFERENCED PLANT-SPECIFIC REQUIREMENTS TO THE APPENDIX A GDC AS RELATED TO THE PROPOSED CHANGE.] This difference does not alter the conclusion that the proposed change is applicable to [PLANT]."

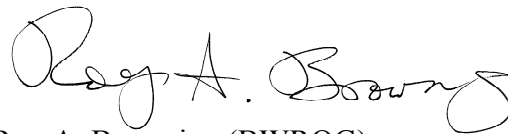
3. In future model SEs, the NRC should provide guidance to reviewers to utilize the discussion of the 10 CFR 50, Appendix A GDC in the model SE or the licensee-provided discussion of plant-specific requirements, as applicable.
4. The TSTF will recommend that licensees adopting previously-approved Travelers do the following:
 - a. If the Traveler or model SE reference the 10 CFR 50, Appendix A GDC and that is consistent with the plant's licensing basis, the model application should be used as written.
 - b. If the Traveler or model SE reference the 10 CFR 50, Appendix A GDC and that is not consistent with the plant's licensing basis, a discussion similar to the example in Item 2 should be included in the model application, Section 2.1, "Applicability of the Published Safety Evaluation." We do not expect that this variation will result in a Traveler being removed from Consolidated Line Item Improvement Process (CLIIP), if applicable.

Please respond and confirm that these actions will address the NRC staff concern.

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



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Enclosure

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