

TSTF-529, Revision 0
Acceptance Review Summary

The following changes included in TSTF-529 would be acceptable for review:

- An editorial change is made to LCO 3.0.4.b to clarify that LCO 3.0.4.a, LCO 3.0.4.b, and LCO 3.0.4.c are independent options. The LCO 3.0.4.a Bases are revised.
- The introductory paragraphs of the LCO 3.0 and SR 3.0 Bases, and the SR 3.0.2 Bases are modified to state that the usage rules are applicable to Chapter 3 of the TS and to clarify their use when invoked from Chapter 5.
- The LCO 3.0.3 Bases are corrected to state that a unit shutdown may be terminated and LCO 3.0.3 exited if the LCO is no longer applicable.
- The LCO 3.0.4.c Bases are modified to replace a misleading TS reference.
- The LCO 3.0.5 Bases are modified to clarify that LCO 3.0.5 should not be used if there are other alternatives to demonstrate Operability that maintain compliance with Actions. An inaccurate example in the LCO 3.0.5 Bases is replaced.
- The SR 3.0.3 Bases are modified to clarify when SR 3.0.3 may be applied and to state expectations for applying SR 3.0.3 when an SR has not been performed for an extended period.

The following changes included in TSTF-529 would not be acceptable for review (with no opportunity to supplement):

- Section 1.3 and the Bases of LCO 3.0.2 are modified to clarify and provide an example of "time of discovery."
- LCO 3.0.5 is reworded to be consistent with the other LCO 3.0 specifications and to eliminate unnecessary restrictions.
- The Bases of LCO 3.0.2, LCO 3.0.3, SR 3.0.2, and SR 3.0.3 are revised to replace the term "Operational Convenience," with the intention from Generic Letter 87-09 of "voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable."
- Changes are made to the Bases of LCO 3.0.3 and SR 3.0.3 to use consistent terminology.

The following change in TSTF-529 is pending the completion of the CLINTO TIA on LCO 3.6.4.3 Standby Gas Treatment System:

- LCO 3.0.4.a is modified to clarify that Required Actions must be followed after entry into the Modes and other specified conditions in the Applicability. An example is added to the Bases.

The following change included in TSTF-529 would not be acceptable for review *with* an opportunity to supplement:

- An addition is made to Section 1.3 for Westinghouse plants (NUREG-1431) to discuss the Westinghouse-specific instrumentation Notes that allow entering a Condition and not starting the Completion Time until expiration of a time allowance in a Note.

Not acceptable with opportunity for supplement to identify operating plant data that demonstrates industry or the NRC have a compliance concern with misapplication of TS because the TS Notes are unclear.

The TSTF change adds a new Section 1.3 paragraph which applies to a handful of TS Notes. However, the new paragraph does not explain how the Notes that it applies to (it only applies to two instrumentation LCOs) are an exception to the convention that applies to all other TS Notes. An explanation is needed in order to have a common understanding of how to apply the TS 1.3 Completion Time discussion.

Additionally, the TSTF does not make a case that there is either an industry or NRC problem with understanding how the Notes modify Westinghouse Plant TS Required Actions for the RPS and ESFAS instrumentation. Licensees who believe the Note should be clarified have the option to change the TS Bases for these Notes under 10 CFR 50.59. Using 10 CFR 50.59 would eliminate the unnecessary burden on NRC and industry resources to process an administrative TS change license amendment requests. Regardless, assuming all licensees do not voluntarily make the change to the Section 1.3 Completion Time discussion, the requirement as described by the plain English meaning of the Note would be unchanged without the clarification.