

March 4, 2013

Technical Specifications Task Force (TSTF)  
11921 Rockville Pike, Suite 100  
Rockville, MD 20852

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: TRAVELER TSTF-537,  
REVISION 0, "INCREASE CIV [CONTAINMENT ISOLATION VALVE]  
COMPLETION TIME; UPDATE OF TSTF-373" (TAC NO. ME8311)

Dear Members of the TSTF:

By letter dated March 27, 2012 (Agencywide Documents Access and Management System Accession No. ML12087A274), the TSTF submitted for U.S. Nuclear Regulatory Commission (NRC) staff review Traveler TSTF-537, Revision 0, "Increase CIV Completion Time; Update of TSTF-373." Upon review of the information provided, the NRC staff has determined that additional information is needed to complete the review. On February 14, 2013, Brian Mann, Vice President of Industry Programs, EXCEL Services Corporation, and I agreed that the NRC staff will receive your response to the enclosed request for additional information (RAI) questions within 90 days of the date of this letter. If you have any questions regarding the enclosed RAI questions, please contact me at 301-415-1774 or via e-mail at Michelle.Honcharik@nrc.gov.

Sincerely,

**/RA/**

Michelle C. Honcharik, Sr. Project Manager  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

Project No. 753

Enclosure:  
As stated

cc w/encl: See next page

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ADAMS Accession No.: ML13045A860; \*concurrent via memo (ML122280730); \*concurrent via e-mail

NRR-106

| OFFICE | PLPB/PM    | PLPB/LA    | APLA/BC    | PLPB/BC    | STSB/BC    | PLPB/PM     |
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| DATE   | 02/14/2013 | 02/21/2013 | 02/05/2013 | 02/25/2013 | 02/28/2013 | 03/04/2013  |

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REQUEST FOR ADDITIONAL INFORMATION  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
TRAVELER TSTF-537, REVISION 0, "INCREASE CIV [CONTAINMENT ISOLATION VALVE]  
COMPLETION TIME; UPDATE OF TSTF-373"  
TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)  
PROJECT NO. 753

1. The U.S. Nuclear Regulatory Commission's (NRC's) safety evaluation (SE) of the Combustion Engineering Owners' Group (CEOG) Joint Application Report (JAR) Combustion Engineering (CE) NPSD-1168-1, "Joint Applications Report for Containment Isolation Valve AOT [Allowed Outage Time] Extension," January 2001, available in the Agencywide Documents Access and Management System (ADAMS) as Accession No. ML003721663 states:

We agree with the CEOG findings that, based on the use of bounding risk parameters for CE designed plants, the proposed increase in containment isolation valve (CIV) AOT from 4 hours to 7 days does not result in an unacceptable incremental conditional core damage probability (ICCDP) or incremental conditional large early release probability (ICLERP) according to the criteria of Regulatory Guide 1.177 when the items identified below are acceptably addressed by individual licensees referencing this report in plant-specific submittals.

Given that the topical report was completed a while ago, assess whether the bounding risk parameters may still be considered bounding or not, and provide the basis for your conclusion. In addition, since generic unreliability and unavailability data can change over a long period of time, discuss whether CIV performance based on data since the completion of the JAR is consistent with assumptions made in the supporting JAR analyses, and provide the basis for the conclusions.

2. TSTF-537 notes that the JAR identified three sets of valves to which the revised completion time (CT) will not apply. This includes containment sump supply valves to the emergency core cooling systems and containment spray system pumps, valves associated with the main feedwater system, and main steam isolation valves. Please clarify how the proposed Standard Technical Specification (STS) 3.6.3 precludes the application of the extended CT to the main feedwater valves and main steam isolation valves.
3. TSTF-537 proposes to address common cause failures with Required Action B.1. Required Action B.1 should require verification that the redundant CIVs in a penetration flow path are

ENCLOSURE

not rendered inoperable due to reasons besides common cause failure prior to exceeding the existing 4-hour CT. Since redundant CIVs may fail due to common cause or other reasons, how does TSTF-537 ensure operability of the redundant CIVs for reasons other than common cause failure prior to entering the extended CT?

4. Condition E of TSTF-537 includes a change in the CT from 72 hours to 7 days. This had been proposed in TSTF-373, Revision 2, previously under Condition D.

The bases for “Required Actions” E.1 and E.2 provide criteria for penetrations:

Penetration flow paths eligible for application of the 7 day Completion Time meet the following criteria:

- Containment isolation valves in penetrations connected to nonessential containment cooling systems;
- The closed system piping inside containment is seismically qualified; and,
- Containment isolation valves in the penetration flow paths are air operated valves designed to fail in the closed position and are designed to close automatically by an engineered safety feature actuation system (ESFAS) signal.

- a. Please indicate in which supporting documentation these criteria are discussed.
  - b. What is meant by a nonessential containment cooling system?
5. Section 2.3, “Verification and Commitments,” of the model application does not mention the following important considerations in the licensee’s submittal for this Traveler:
    - a. Regulatory Guide (RG) 1.174 for probabilistic risk assessment quality considerations, and other information for risk-informed considerations.
    - b. Licensees adopting this Traveler must confirm plant-specific implementation and monitoring in accordance with the guidance in RG 1.174 and RG 1.177;
    - c. Plant-specific Tier 3 information must be provided in submittals;
    - d. The Tier 3 Configuration Risk Management Program (CRMP) enhancement to include large early release frequency (LERF) and ICLERP is not mentioned; rather, line item Number 4 requests licensees to commit to “implementing methodologies.” A licensee’s CRMP, including those implemented under the maintenance rule 10 CFR 50.65(a)(4), must be enhanced to include a LERF/ICLERP assessment. This assessment must be documented in a regulatory commitment in the plant-specific application.

- e. Plant-specific applicability of Tier 2 analysis;
- f. The licensee considers specific penetrations consistent with those analyzed, and provides a plant-specific analysis for configurations not addressed by the groups described in CE NPSD-1168-A;
- g. Licensees provide supporting information that verifies that a penetration remains intact during maintenance activities, including corrective maintenance;
- h. Licensees must confirm that the action of locking open a subject CIV will not result in the design basis technical specification leakage being exceeded;
- i. For external events, in performing the plant-specific analyses, credit for physical barrier integrity outside containment can only be given for seismically qualified piping; and,
- j. Evaluation of cumulative risk on a plant-specific basis consistent with RG 1.174.

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cc:

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