

August 13, 2015

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RE: TRAVELER TSTF-541,
REVISION 0, "ADD EXCEPTIONS TO SURVEILLANCE REQUIREMENTS
WHEN THE SAFETY FUNCTION IS BEING PERFORMED" (TAC NOS. MF2723
AND MF2724)

Dear Members of the Technical Specifications Task Force:

By letter dated September 10, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13253A390), you submitted to the U.S. Nuclear Regulatory Commission (NRC) for review and approval Traveler TSTF-541, Revision 0, "Add Exceptions to Surveillance Requirements When the Safety Function is Being Performed." Upon review of the information provided, the NRC staff has determined that additional information is needed to complete the review. On August 13, 2015, 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, Senior 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.: ML15208A287; *concurring via e-mail

NRR-106

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REQUEST FOR ADDITIONAL INFORMATION RE: TRAVELER TSTF-541, REVISION 0, "ADD EXCEPTIONS TO SURVEILLANCE REQUIREMENTS WHEN THE SAFETY FUNCTION IS BEING PERFORMED" (TAC NOS. MF2723 AND MF2724)

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Technical Specifications Task Force

Project No. 753

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REQUEST FOR ADDITIONAL INFORMATION

TSTF-541, REVISION 0, "ADD EXCEPTIONS TO SURVEILLANCE REQUIREMENTS WHEN

THE SAFETY FUNCTION IS BEING PERFORMED"

TAC NOS. MF2723 AND MF2724

By letter dated September 10, 2013 (Agencywide Documents Access and Management System Accession No. ML13253A390), the Technical Specifications (TS) Tack Force submitted Traveler TSTF-541, Revision 0, "Add Exceptions to Surveillance Requirements When the Safety Function is Being Performed."

The proposed changes would provide exceptions to certain Surveillance Requirements (SRs) for dampers and valves that are in certain positions. It revises the current TS for the standby gas treatment system and the control room environmental control system in Standard TS (STS) NUREG-1430 through NUREG-1434.

RAI #1

The regulation at Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," Criterion XI, "Test Control," states:

A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components [SSCs] will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

The regulation at 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," states:

Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

The regulation at 10 CFR 50.36(c)(3) states:

Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

ENCLOSURE

The technical basis provided for the proposed changes to the STS contains a discussion of why it would be acceptable to not perform certain SRs for certain equipment when the subject SSC is capable of performing its specified safety function. This justification focused on the third reason for SRs, namely to assure that the limiting conditions for operation will be met. However, no technical basis was provided to demonstrate that the proposed changes to the respective SRs would continue to provide assurance that facility operation will be within safety limits and provide assurance that the necessary quality of systems and components will be maintained. Please provide a complete discussion regarding how the SRs will continue to meet 10 CFR 50.36(c)(3).

RAI #2

Contrary to 10 CFR Part 50, Appendix B, Criterion XI, the proposed changes could allow components that are designed to be operated periodically to degrade in a manner not accounted for in the component's design while secured in a given position for a prolonged period. Likewise, the proposed changes could introduce potential latent degradation of components, which is contrary to 10 CFR Part 50, Appendix B, Criterion XVI. Please provide a discussion regarding how the SRs will be consistent with 10 CFR Part 50, Appendix B, Criterion XI and Criterion XVI.

RAI #3

Please provide a discussion (i.e., detailed description and technical evaluation) regarding how or when particular SSCs would be identified for the requested exemption and when the exemption would no longer apply. In addition, the proposed change appears to be circumventing the requirements of SR 3.0.1, fundamentally altering the purpose of SRs. It is not clear from the submittal why this change is necessary.

RAI #4

Please provide a discussion (i.e., detailed description and technical evaluation) regarding why new conditions were not proposed that would contain a required action to place the SSC in its accident/actuated position. In addition, new conditions could provide appropriate Completion Times for restoration.

RAI #5

Please provide a discussion regarding whether or not a safety benefit would be achieved by the proposed changes or if there is any operating experience that led the industry to propose these changes.

RAI #6

The justification for the proposed changes focuses on the actuation function and not the potential unintended consequences of operating the system in an "off-normal" condition for an undefined time. For example, many of the SRs, where the additional language is proposed to be added, involve engineered safety function heating ventilation and air conditioning systems that may contain both high-efficiency particulate air (HEPA) and activated charcoal filters that degrade with use (HEPA filters clog and the efficiency of activated charcoal can decrease). No

justification is provided to address the impacts of allowing the filtration systems to be operated continuously for an undetermined time. Please justify how the filtration systems, if allowed to operate for an undefined amount of time, would continue to meet their design requirements and the efficiencies and flows assumed in design basis accident analyses.