

April 12, 2016

TSTF-16-04  
PROJ0753

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

**SUBJECT:** Withdrawal from NRC Review of TSTF-454, Revision 3, "Extend PCIV Completion Times (NEDC-33046)," and TSTF-537, Revision 0, "Increase CIV Completion Time; Update of TSTF-373"

Traveler TSTF-454, Revision 3, "Extend PCIV [Primary Containment Isolation Valve] Completion Times (NEDC-33046)," is applicable to Boiling Water Reactors (BWRs). TSTF-537, Revision 0, "Increase CIV [Containment Isolation Valve] Completion Time; Update of TSTF-373," is applicable to Combustion Engineering (CE) plants. Both of these travelers justify a longer Completion Time (CT) for inoperable containment isolation valves. TSTF-454 and TSTF-537 (originally TSTF-373) are some of the earliest risk-informed travelers pursued by the industry and the NRC. A timeline of their parallel development and review is attached.

TSTF-454 and TSTF-537 are based on NRC-approved topical reports (NEDC-33046 and CE-NPSD-1168). TSTF-454 and TSTF-537 use the same methodology and propose consistent Technical Specifications changes as TSTF-498, Revision 1, "Risk-Informed Containment Isolation Valve Completion Times (BAW-2461)." TSTF-498 is applicable to Babcock & Wilcox plants and was approved by the NRC in 2009. TSTF-454 and TSTF-537 are also similar to TSTF-446, Revision 3, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)," which is applicable to Westinghouse plants and was approved in 2010.

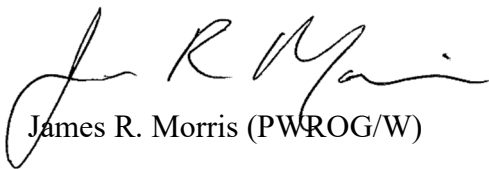
On June 23, 2014, the TSTF responded to an NRC Request for Additional Information (RAI) on TSTF-537 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14174A860). On March 31, 2015, the TSTF responded to a very similar NRC RAI on TSTF-454 (ADAMS Accession No. ML15090A617).

The NRC provided draft second-round RAIs on TSTF-454 and TSTF-537. The second-round draft RAIs repeated many of the same questions addressed in the first round RAIs. A meeting was held on August 28, 2015 to discuss the draft questions. While the TSTF believed we had adequately addressed the staff concerns, the final second-round RAIs transmitted in early 2016 were unchanged from the drafts.

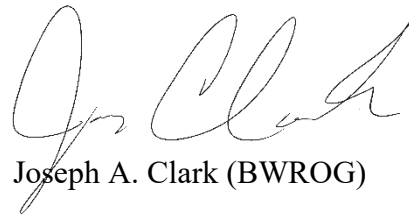
The industry has made a significant investment in TSTF-454 and TSTF-537, paying over \$300,000 in NRC review fees in just the last four years. However, it does not appear likely that we can obtain NRC approval without expending significant additional resources. Therefore, we have decided to withdraw the travelers.

It is disappointing that we could not reach agreement on these improvements after 14 years of development, particularly when the NRC had previously approved the methodology and similar TS changes for other plant designs. The TSTF will evaluate the review of these travelers and consider what actions we should take in the future when faced with a similar impasse.

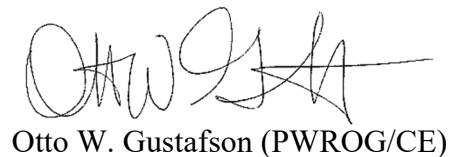
Should you have any questions, please contact us.



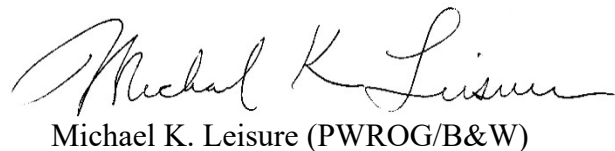
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Attachment

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## Attachment

### TSTF-454 and TSTF-537 Time Line

<u>TSTF-537, Increase CIV Completion Time; Update of TSTF-373</u>		<u>TSTF-454, Extend PCIV Completion Times</u>	
06/1999	Topical Report (TR) CE-NPSD-1168 submitted	05/2002	TR NEDC-33046 submitted
06/2000	CE-NPSD-1168 approved	09/2003	TSTF-454 submitted
04/2001	TSTF-373 submitted	01/2005	NEDC-33046 approved
02/2004	TSTF-373 approved by NRC	12/2005	TSTF-454R1 approved by NRC
~2005	NRC informally withdrew approval of TSTF-373	No adoptions due to restrictive safety evaluation (SE) conditions on NEDC-33046 and TSTF-454	
01/2009	TSTF-498, B&W CIV CT Traveler approved	01/2009	TSTF-498, B&W CIV CT Traveler approved
07/2010	TSTF-446, W CIV CT Traveler approved	07/2010	TSTF-446, W CIV CT Traveler approved
03/2012	TSTF-537 submitted addressing NRC withdrawal of TSTF-373	02/2012	TSTF-454R2 submitted addressing SE conditions
10/2012	NRC RAI received. RAI requested reconfirmation of TR conclusions. Required re-performing TR analyses.	10/2012	NRC RAI received. RAI requested reconfirmation of TR conclusions. Required re-performing TR analysis.
06/2014	RAI response submitted	03/2015	RAI response and TSTF-454R3 submitted
07/2015	Draft second round RAI received	07/2015	Draft second round RAI received
08/28/2015	TSTF/NRC Drop-In to Discuss draft RAIs	08/28/2015	TSTF/NRC Drop-In to Discuss draft RAIs
02/04/2016	Second round RAI received	01/12/2016	Second round RAI received