Model Application

[DATE] 10 CFR 50.90

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

DOCKET NO. PLANT NAME
50-[xxx]
SUBJECT: APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSTF-541, "ADD EXCEPTIONS TO SURVEILLANCE REQUIREMENTS WHEN THE SAFETY FUNCTION IS BEING PERFORMED"

Pursuant to 10 CFR 50.90, [LICENSEE] is submitting a request for an amendment to the Technical Specifications (TS) for [PLANT NAME, UNIT NOS.].

[LICENSEE] requests adoption of TSTF-541, "Add Exceptions to Surveillance Requirements when the Safety Function is Being Performed," which is an approved change to the Improved Standard Technical Specifications (ISTS), into the [PLANT NAME, UNIT NOS] Technical Specifications (TS). The proposed change revises TS Surveillance Requirements (SRs) by adding exceptions excluding from actuation those valves and dampers that are locked, sealed or otherwise secured in the actuated position.

The enclosure provides a description and assessment of the proposed changes. Attachment 1 provides the existing TS pages marked up to show the proposed changes. Attachment 2 provides revised (clean) TS pages. Attachment 3 provides existing TS Bases pages marked to show the proposed changes for information only. {Note: the attachments are not included in the model application.}

Approval of the proposed amendment is requested by [date]. Once approved, the amendment shall be implemented within [ ] days.

There are [no] regulatory commitments made in this submittal.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated [STATE] Official.

[In accordance with 10 CFR 50.30(b), a license amendment request must be executed in a signed original under oath or affirmation. This can be accomplished by attaching a notarized affidavit confirming the signature authority of the signatory, or by including the following statement in the cover letter: "I declare under penalty of perjury that the foregoing is true and correct. Executed on (date)." The alternative statement is pursuant to 28 USC 1746. It does not require notarization.]

If you should have any questions regarding this submittal, please contact [NAME, TELEPHONE NUMBER].

Sincerely,

[Name, Title]

Attachments:
1. Proposed Technical Specification Changes (Mark-Up)
2. Revised Technical Specification Pages
3. Proposed Technical Specification Bases Changes (Mark-Up) for Information Only

[The attachments are to be provided by the licensee and are not included in the model application.]

cc: NRC Project Manager
NRC Regional Office
NRC Resident Inspector
State Contact

ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

[LICENSEE] requests adoption of TSTF-541, "Add Exceptions to Surveillance Requirements when the Safety Function is Being Performed," which is an approved change to the Improved Standard Technical Specifications (ISTS), into the [PLANT NAME, UNIT NOS] Technical Specifications (TS). The proposed change revises TS Surveillance Requirements (SRs) by adding exceptions excluding from actuation those valves and dampers that are locked, sealed or otherwise secured in the actuated position.

[NUREG-1430, "Standard Technical Specifications Babcock and Wilcox Plants"
- TS 3.6.7, "Spray Additive System,"
- TS 3.7.10, "Control Room Emergency Ventilation System (CREVS),"
- TS 3.7.12, "Emergency Ventilation System (EVS),"
- TS 3.7.13, "Fuel Storage Pool Ventilation System (FSPVS),"]

[NUREG-1431, "Standard Technical Specifications Westinghouse Plants"
- TS 3.6.11, "Iodine Cleanup System (ICS) (Atmospheric and Subatmospheric),"
- TS 3.6.13, "Shield Building Air Cleanup System (SBACS) (Dual and Ice Condenser),"
- TS 3.7.10, "Control Room Emergency Filtration System (CREFS),"
- TS 3.7.12, "Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System (PREACS),"
- TS 3.7.13, "Fuel Building Air Cleanup System (FBACS),"
- TS 3.7.14, "Penetration Room Exhaust Air Cleanup System (PREACS),"]

[NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants"
- TS 3.6.8, "Shield Building Exhaust Air Cleanup System (SBEACS) (Dual),"
- TS 3.6.10, "Iodine Cleanup System (ICS) (Atmospheric and Dual),"
- TS 3.7.10, "Essential Chilled Water (ECW),"
- TS 3.7.11, "Control Room Emergency Air Cleanup System (CREACS),"
- TS 3.7.13, "Emergency Core Cooling System (ECCS) Pump Room Exhaust Air Cleanup System (PREACS),"
- TS 3.7.14, "Fuel Building Air Cleanup System (FBACS)," and
- TS 3.7.15, "Penetration Room Exhaust Air Cleanup System (PREACS)."]

[NUREG-1433, "Standard Technical Specifications General Electric BWR/4 Plants"
- TS 3.5.1, "Emergency Core Cooling Systems (ECCS) Operating,"
- TS 3.5.2, "Emergency Core Cooling Systems (ECCS) Shutdown,"
- TS 3.5.3, "Reactor Core Isolation Cooling System (RCIC),"
- TS 3.6.4.3, "Standby Gas Treatment (SGT) System,"
- TS 3.7.2,"[Plant Service Water (PSW)] System and [Ultimate Heat Sink (UHS)]," and
- TS 3.7.4 "[Main Control Room Environmental Control (MCREC)] System."]

[NUREG-1434, "Standard Technical Specifications General Electric BWR/6 Plants"
- TS 3.5.1, "Emergency Core Cooling Systems (ECCS) Operating,"
- TS 3.5.2, "Emergency Core Cooling Systems (ECCS) Shutdown,"

TS 3.5.3, "Reactor Core Isolation Cooling System (RCIC),"
TS 3.6.1.7, "Residual Heat Removal (RHR) Containment Spray System,"
TS 3.6.4.3, "Standby Gas Treatment (SGT) System,"
TS 3.7.1, "[Standby Service Water (SSW)] System and [Ultimate Heat Sink (UHS)],"
TS 3.7.2, "High Pressure Core Spray (HPCS) Service Water System (SWS)," and
TS 3.7.3, "[Control Room Fresh Air (CRFA)] System."]]

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

[LICENSEE] has reviewed the safety evaluation for TSTF-541 provided to the Technical Specifications Task Force in a letter dated [DATE]. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-541. [As described herein,]

While the allowances would permit components that are fulfilling their safety function to be exempted from testing under the SR, [LICENSEE] acknowledges the proposed changes will not permit a system that is inoperable to be considered operable. As stated in the [SR 3.0.1] Bases, "Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when: a. The systems or components are known to be inoperable, although still meeting the SRs."

[LICENSEE] has concluded that the justifications presented in TSTF-541 and the safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] TS.

2.2 Variations

[LICENSEE is not proposing any variations from the TS changes described in TSTF-541 or the applicable parts of the NRC staff's safety evaluation dated [DATE].] [LICENSEE is proposing the following variations from the TS changes described in TSTF-541 or the applicable parts of the NRC staff's safety evaluation: describe the variations.]

[The [PLANT] TS utilize different [numbering][and][titles] than the Standard Technical Specifications on which TSTF-541 was based. Specifically, [describe differences between the plant-specific TS numbering and/or titles and TSTF-541 numbering and titles.] These differences are administrative and do not affect the applicability of TSTF-541 to the [PLANT] TS.]

[The [PLANT] TS contain requirements that differ from the Standard Technical Specifications on which TSTF-541 was based, but these differences do not affect the applicability of the TSTF-541 justification. [Describe differences and why TSTF-541 is still applicable.]

2.3 Licensee Verifications or Commitments

[[LICENSEE] confirms that ~~their~~ existing administrative processes (Ref 1, 2,..) require assessing system operability ~~when~~ prior to, during and after utilizing the SR allowances, which includes consideration of whether movement of the affected valves or dampers following an accident is assumed in the safety analysis.]

[LICENSEE] confirms that under the proposed change, the affected valves and dampers may be excluded from testing when locked, sealed or otherwise secured in the actuated position only if the safety analysis does not assume movement from the actuated position following an accident. Otherwise, the system cannot perform its specified safety function and is inoperable regardless of whether the SR is met.

[LICENSEE] confirms for components for which the SR allowance can be utilized, the SR must be verified to be met after removing the valve or damper from the locked, sealed or otherwise secured status.

~~[[LICENSEE] commits to revising their administrative processes require assessing system operability when utilizing the SR allowances before implementation of the amendment, which will include consideration of whether movement of the affected valves or dampers following an accident is assumed in the safety analysis.]~~

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

[LICENSEE] requests adoption of TSTF-541, "Add Exceptions to Surveillance Requirements When the Safety Function is being Performed," which is an approved change to the Standard Technical Specifications (STS), into the [PLANT NAME, UNIT NOS] Technical Specifications (TS). The proposed amendment modifies the TS Surveillance Requirements (SRs) by adding exceptions to consider the SR met when valves or dampers are locked, sealed, or otherwise secured in the actuated position. However, the subject structure, system or component (SSC) is still must be capable of performing its specified safety function.

[LICENSEE] has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No

   The proposed change revises SRs by adding exceptions excluding from actuation and isolation time testing those valves and dampers that are locked, sealed or otherwise secured in the actuated position. The performance or exclusion of performance of SRs is not an initiator of any accident previously evaluated. As a result, the proposed change has no effect on the probability of any accident previously evaluated. The proposed change excludes performance of certain SRs when the SR is not required to demonstrate that the SSC can perform the safety functions assumed in the accident analysis. As a result, the SSCs continue to perform their mitigating functions and the consequences of any accident previously evaluated are not affected.

   Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed change revises SRs by adding exceptions excluding from actuation and isolation time testing those valves and dampers that are locked, sealed or otherwise secured in the actuated position. The change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operations. The change does not alter assumptions made in the safety analysis for pump or train operability or actuated valve or damper position.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change revises SRs by adding exceptions excluding from actuation and isolation time testing those valves and dampers that are locked, sealed or otherwise secured in the actuated position. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis assumptions and acceptance criteria are not affected by this change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, [LICENSEE] concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

3.2 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4. ENVIRONMENTAL CONSIDERATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

5. References

1) [Administrative Process for assessing system operability prior to, during and after utilizing the SR allowances]

Technical Specifications and Bases Proposed Changes