

September 27, 1996

Mr. James Davis
Nuclear Energy Institute
1776 Eye Street, N. W.
Suite 300
Washington, DC 20006-2496

Dear Mr. Davis:

The purpose of this letter is to provide a status of those Traveler Packages that were approved, and to transmit a summary description of those Traveler Packages that were Modified and/or Rejected, as was discussed at our meeting on September 18, 1996. We are in the process of revising the structure of our database to make it more useful in the future; therefore, we are providing the enclosed simplified summary until we can develop a better reporting format.

In addition to the STS changes addressed in the enclosure, one Traveler Package, TSTF-007, was withdrawn by TSTF. Therefore, we consider 59 of the 115 Traveler Packages "closed," unless the TSTF formally appeals any of the modifications or rejections described in the enclosure. Should you have any questions or need additional information, please contact Debby Johnson (301-415-3060 or dlj@nrc.gov) of my staff.

Sincerely,

Original Signed by:

C. I. Grimes

Christopher I. Grimes, Chief
Technical Specifications Branch
Office of Nuclear Reactor Regulation

Enclosures: TSB Traveler Summary

cc: (via e-mail)
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in dark ink, appearing to read "C. Grimes", is written above the typed name.

Christopher I. Grimes, Chief
Technical Specifications Branch
Office of Nuclear Reactor Regulation

Enclosures:
TSB Traveler Summary

cc: (via e-mail)
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TSB TRAVELLER SUMMARY

There are 34 Traveler Packages that have been approved by NRC. They are listed as follows:

TSTF-005, R. 1; TSTF-006, R. 1; TSTF-009, R. 1; TSTF-013, R. 1; TSTF-021; TSTF-023; TSTF-026; TSTF-028; TSTF-032; TSTF-033; TSTF-034; TSTF-035; TSTF-038; TSTF-042; TSTF-047; TSTF-053; TSTF-055; TSTF-056; TSTF-057; TSTF-060; TSTF-061; TSTF-062; TSTF-063; TSTF-065; TSTF-070; TSTF-077; TSTF-078; TSTF-089; TSTF-095; TSTF-097; TSTF-098; TSTF-099; TSTF-100; and TSTF-101.

There are 7 Traveler Packages that will be approved with a Modification, and 12 Traveler Packages that are Rejected. The Traveler Package numbers with a summary of the disposition follows in numerical order.

TSTF-001, R. 1

REJECT: While the concept behind the proposed change seems reasonable, the associated Bases change demonstrates how the change appears to introduce a new confusion. The purpose of LCO 3.0.5 is to ensure that equipment can be returned to service so that restoration of compliance can be demonstrated before the condition is truly exited (*declared inoperable to comply with ACTIONS*). However, the example cites the opening of a containment isolation valve to obtain an sample associated with an unrelated SR. The LCO for CIVs already provides for the use of admin controls for such conditions, and the Bases for LCO 3.0.5 already describes the same CIV situation in much simpler terms. The other circumstances described in the change package to justify the need for clarification similarly do not involve variables to be within limits specifically related to the LCO condition or REQUIRED ACTIONS that are needed to demonstrate some restoration of compliance with the associated LCO. On this Basis, TSB concludes that the proposed change may only confuse the TS usage, and that the existing language in LCO 3.0.5 is adequate in its existing form for the circumstances described.

TSTF-003, R. 1

REJECT: The proposed change would relocate the specific references for the calculation of DOSE EQUIVALENT I-131 from the definition of that term to a licensee-controlled document. The justification for this change relies on the consistency of defined terms and the desire to use the Bases Control Program (comparable to \$50.59) to make changes to the calculational practices. After consulting with PERB, TSB has concluded that the referenced standards in the definition are appropriate for the term, are designated as plant-specific (bracketed) to allow

for possible variability in the calculational standards for individual plant licensing bases. Further, it is not apparent how changes in such calculational standards could be adequately judged under §50.59; thus, the staff has concluded that changes in those calculational references should be made as license amendments and the detail in the definition of DOSE EQUIVALENT I-131 should be retained.

TSTF-008, R. 1

MODIFY: Approved with modification to SR 3.0.1 for NUREGs-1430, -1431, and -1432 to include "(including applicable acceptance criteria)" after "...satisfy the requirements..." in the first sentence of the paragraph to be inserted as second paragraph after SR 3.0.1.b.

TSTF-010, R. 1

REJECT: Changing the Applicability to MODE 2 with $k_{eff} \geq 1.0$, assumes a capability to achieve Rod Group Alignment Limits (3.1.5), Shutdown Bank Insertion Limits (3.1.6) and Rod Position Indication (3.1.8) instantly. Rather, the staff believes that adequate reactivity control should recognize the importance of the approach to criticality and potential uncertainties in the determination of the point at which criticality occurs. Directing the plant to MODE 3 (rather than MODE 2 with $k_{eff} \geq 1.0$) is clearly a safe state relative to these reactivity control requirements, and provides a margin against those uncertainties. It is not clear that there is otherwise any need for this change.

TSTF-011, R. 1

REJECT: The proposed change would delete "all" from LCO 3.1.5 to clarify that only one system is required to determine rod positions within 12 steps for the DRPI system. However, it is not apparent that the change accomplishes the stated purpose, but instead would seem to confuse the scope of the limiting condition for operation. The existing Bases description for the DRPI system appears to adequately explain that only one subsystem of the DRPI is needed to demonstrate that all individual indicated rod positions [are] within 12 steps of their group step counter demand position.

TSTF-014, R. 2

MODIFY: Removing "MODE 2" from Applicability and Bases does not enhance clarity. Except for a few refueling LCOs, all other LCOs refer to a Mode. Prefer "MODE 2" be retained in the Applicability section.

TSTF-17

MODIFY [proposed Bases description, as marked up]: "Due to the purely mechanical nature of this interlock, and given that the interlock mechanism is not normally challenged when the containment air lock door is used for entry and exit (procedures require strict adherence to single door opening), this test is only required to be performed every 24 months. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage, and the potential for loss of [primary {BWR only}] containment OPERABILITY if the Surveillance were performed with the reactor at power. ~~Operating experience has shown these components usually pass the Surveillance when performed at the 24 month frequency. The 184 day Frequency is based on engineering judgement and is considered adequate given that the interlock is not challenged during use of the airlock. The 24 month Frequency for the interlock is justified based on generic operating experience.~~"

TSTF-018

REJECT: The attempt to clarify the "one door" air lock provision only serves to confuse the requirements for the optional configurations. NUREG-1434 appears to provide adequate guidance for the BWR-5 design differences and, if existing BWR-4 technical specifications have less restrictive requirements, they can request their existing license requirements be retained. If the TSTF wants to pursue this issue, then SCSB should be presented with complete sets of optional requirements for various airlock configurations.

TSTF-024

REJECT: The proposed change would remove certain details from the SRs for target flux difference, on the basis that these are unnecessary details. The staff disagrees with this assessment, and considers these necessary descriptions of the SR scope which should only be modified by license amendment.

TSTF-025

REJECT: While the staff prefers some of the wording changes associated with QPTR actions, other wording changes are considered more confusing and stimulated additional wording changes to *clarify the requirements*. Inasmuch as the changes appear to mean the same thing, and do not obviously clarify the requirements, the justification for the change is inadequate.

TSTF-027, R. 1

REJECT: Although the proposed change is more restrictive, the staff believes that the purpose of the surveillance is for conditions approaching the minimum temperature for criticality, rather than to make the surveillance more routine. Thus, consistency and simplicity are not as important in this case, as the scope and purpose of the SR.

TSTF-030

MODIFY: Approved with modification to BWR/4 and BWR/6 Section 3.6.1.3, Action C, NOTE, to include "and a closed system" after "PCIV" at the end of the line.

TSTF-031

REJECT: The proposed changes to the examples of Completion Times are justified on the basis that the change conforms more closely to BWR values, while the existing values are more typical for a PWR. The use and applications descriptions should be more generic, thus the justification for the change is not valid. It may be appropriate for the TSTF to search for examples that are common to all plant designs.

TSTF-044

REJECT: The basis for excepting MSSVs, MSIVs, MFIVs, MFRVs, and ADVs from the containment isolation valve requirements does not recognize that the separate LCOs related to these valves are associated with their dual safety function. In TSTF-30, the staff approved a change in the requirements for CIVs in closed systems. The actions and completion times related to inoperability of the CIV function is distinguished from but no less important than the functional capabilities of the secondary system integrity.

TSTF-045

MODIFY: Accept SR clarification (exception for lock-closed valves), provided corresponding clarification is included in the Bases.

TSTF-046

MODIFY: The staff recommends that the words "each power operated and each automatic" in the SR and "each power operated and automatic" in the SR Bases section be changed to "each automatic power operated" in the PWR STS and "each power operated, automatic" in the BWR STS to be consistent with the LCO Bases section.

TSTF-086

REJECT: TSB has been working with HHFB to obtain generic approval for the removal of specific overtime limits from the technical specifications, provided that the Admin Controls retain a requirement for a process for establishing and maintaining such limits. The TSTF can comment on the recommended form of the Admin Control when the proposed GL is published for public comment.

TSTF-102

REJECT: The proposed change to the Required Action verification of MSIV and MFIV closure from 7 days to 31 days is intended to provide consistency with the Required Action for containment isolation valves. However, because of the dual-function nature of these valves (differences in the nature of inoperability) and possible differences in the nature of the verification, the proposed change is not adequately justified. Moreover, the change only addresses the verification action, while there are other aspects of comparability between the two LCOs that are not addressed. Therefore, this partial change would only introduce additional confusion relative to those differences. Any action to reconcile the differences in the requirements for such dual-function valves would be a significant generic effort.

TSTF-106

MODIFY: Approved insert for simplification and consistency, with a modification to BWOG frequency from 30 to 31 days.