

TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM HIGHLIGHTS

This is the second issue of the TECHNICAL SPECIFICATIONS IMPROVEMENT PROGRAM HIGHLIGHTS. These highlights are being issued regularly by the Technical Specifications Branch in an effort to keep both Headquarters and Regional staff informed of important developments in the joint NRC/Industry program to implement the recently issued Commission Policy Statement on Technical Specifications Improvement. Comments or suggestions for future issues should be referred directly to Millard Wohl, Mail Stop 516, telephone extension x27458.

° STAFF APPROVES BWR OWNERS GROUP TOPICAL REPORT NEDC-30851 P, "TECHNICAL SPECIFICATION IMPROVEMENT ANALYSES FOR BWR REACTOR PROTECTION SYSTEM"

The staff issued an SER on the above topical report to the BWR Owners Group chairman on July 15, 1987. The staff acceptance of this topical report will permit certain BWR licensees to extend the current weekly and monthly RPS sensor channel functional test intervals to quarterly intervals for BWR relay-type RPS plants. Allowable repair and test times of 1 hour and 2 hours for the BWR RPS relay sensor channels are extended to 12 hours and 6 hours, respectively.

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° STAFF REVISES TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM PLAN

A revised NRC Technical Specification Improvement Program Plan has been developed in response to the Commission's recently promulgated Interim Policy Statement on Technical Specification Improvement. The Program Plan as revised now emphasizes the details of how to implement (as opposed to develop) the Commission's Policy Statement.

One section of the Program Plan lists those tasks, along with a schedule for completion, necessary to develop the completely rewritten Standard Technical Specifications (STS) called for in the Policy Statement. The objective of rewriting the STS is to reduce their size and complexity by retaining only requirements of prime safety importance and to incorporate human factors and other general improvements in order to make Technical Specifications more understandable. As a result, the new STS will be a more effective tool for assuring plant safety. Once developed, the new STS will be implemented at individual plants through plant-specific license amendments.

Another section of the Program Plan is devoted to activities aimed at improving the technical substance of specific line item requirements in the Technical Specifications. These activities include such things as a

reevaluation of the appropriateness of current action statements, allowed outage times, and surveillance intervals.

The Program Plan, now in its early stages of implementation, carries with it a central theme of the Commission's Policy Statement, that of a voluntary, cooperative, joint NRC and industry approach to Technical Specifications improvement. Many of the activities in the Plan require detailed submittals from industry working groups. These activities were discussed with the appropriate industry representatives while they were being defined and the NRC expects the full support of the industry in this important program.

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° VOLUNTARY ENTRY INTO TECHNICAL SPECIFICATION ACTION STATEMENTS

Action Statements establish time limits for implementing remedial measures when a Limiting Condition for Operation (LCO) is not met. This time limit is commonly referred to as the Allowable Outage Time (AOT) since it defines a limiting time duration for which a system or component may be out of service for corrective maintenance when it is found to be inoperable. The AOTs also establish the limiting time durations for which a system or component may be voluntarily removed from service for surveillance testing or investigation of operational problems. Generally the TS require an orderly plant shutdown when the stated remedial action is not completed within the limits of the AOT.

Specification 3.0.3 in the Standard Technical Specifications establishes the time limits for an orderly plant shutdown which apply when the action requirements do not specify a remedial measure for a condition where the LCO is not met. Recently it has come to NRR's attention that some licensees have voluntarily entered the forced plant shutdown requirements of Specification 3.0.3 as an operational convenience. An example is the removal of redundant systems from service to perform a surveillance test. Since such actions remove the last echelon of defense against deleterious events, NRR has alerted Regional Administrators* that voluntary use of Specification 3.0.3 is unacceptable as an operational convenience in lieu of other courses of action. The updated Bases for the general requirements that are applicable to LCOs and surveillance requirements included in Generic Letter 87-09 reflect these positions.

*Memorandum from Thomas E. Murley, Director, NRR to Regional Administrators, dated June 17, 1987.

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° NRC CONTRACTOR COMPLETES "A REVIEW OF THE COMBUSTION ENGINEERING EVALUATION FOR EXTENDING THE RPS AND ESFAS TEST INTERVALS"

On 7/20/87, the staff received a draft Technical Evaluation Report (TER) on the CE Owners Group topical report CEN-327, "RPS/ESFAS Extended Test Interval Evaluation." The EG&G

TER (EGG-REQ-7768) consisted of determining the adequacy of the models, assumptions, data, and methodologies used by CE to provide a basis for extending the surveillance test intervals (STIs) for selected components in the Reactor Protection System (RPS) and the Engineered Safety Features Actuation System (ESFAS). Audit calculations and Sensitivity Studies were performed during the review to determine the validity of CE's conclusions regarding the increased STIs. A preliminary conclusion is that the CE proposed extended test intervals for selected RPS components are acceptable and applicable to all evaluated CE plants. This acceptance is conditional upon analyses or empirical data showing no unacceptable effects of extended test intervals on bistable setpoints. The Staff review of CEN-327 will be based in part on the TER from EG&G and will be documented in an SER, which is scheduled for completion in February 1988.

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° DAVIS-BESSE TECH SPECS AVAILABLE ON IBM-XT

The Davis-Besse Project Manager has a new tool available to help find information in the plant Technical Specifications. The Davis-Besse Tech Specs have been loaded onto the 20 MB hard disk of an IBM-XT, providing a means to quickly and thoroughly search the document for selected information. Commercially available software, ZyINDEX, permits a complete search of the document for the occurrence of any word or phrase, and allows the user to view the text wherever the word or phrase occurs. If desired, a printout of the text can be obtained. In addition to searching for a word or phrase, connectors such as AND, OR, and NOT can be used as well as a proximity search, i.e., the occurrence of a word or phrase separated by no more than a user-specified number of words from another word or phrase.

Toledo Edison Co. made 5520 word processor disks of the Tech Specs available to the NRC and IRM then converted the stored files to PC format. The updated FSAR is also available on 5520 disks, and will eventually be converted for the PC providing a similar search capability of the FSAR.

In addition to the approach being followed for Davis-Besse, NRR's Administrative staff is pursuing an approach whereby all plant TS would be available on a microcomputer with several modems for Headquarters and Regions.

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° REGIONAL BRIEFINGS ON THE TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM

The Technical Specifications Branch is conducting a series of briefings for Regional personnel on the Technical Specification Improvement Program.

The Region II briefing will be conducted in conjunction with the August 11-14 meeting of Resident Inspectors (RIs). The briefings will focus on how the Agency plans to implement the Commission's Interim Policy Statement on TS Improvement (see 52 FR 3788). Regional input and comments will be solicited on the overall TS Improvement Program; on recent submittals from

both the Westinghouse and B&W Owners Groups, containing samples of their new Standard Technical Specifications (Phase I submittals); and on the NRC Staff's assessment of these submittals.

Other more limited plant-specific improvement initiatives being considered by the Staff will be highlighted. For example, implementation of certain aspects of the Policy Statement at a pilot plant, such as Farley, is under consideration as a means of producing early improvement program results and providing valuable insights into the practical aspects of implementing the Commission's Policy Statement.

The Technical Specifications Branch briefed Region IV on the Technical Specification Improvement Program in May 1987. Similar briefings for the other Regions will be scheduled for later this year.

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° NEED A TECHNICAL SPECIFICATION INTERPRETATION?

One important function of the Technical Specifications Branch (TSB) is to help people resolve TS issues and to answer their questions related to TS. Questions regarding TS interpretation, bases, clarification, meaning, intent, requirements, and/or philosophy (both generic and plant specific) can be referred to TSB. While the TSB resources are limited, we will make every effort to provide timely assistance. We may be able to answer questions "on the spot." However, often we will have to research the question before answering. If such research is necessary, we will make use of several resources, including our Tech Spec Background Books. These Background Books are a compendium of memos, letters, etc., which have been issued to answer previous Tech Spec questions. (We are considering making these Background Books available as a Code of Tech Spec Interpretations; there will be more discussion of this in future issues of the Highlights).

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° OTHER INFORMATION AND TS INTERPRETATIONS AVAILABLE

A contract has been awarded to Applied Biomathematics, Inc., of Setauket, New York, to make the FRANTIC III computer code available in a user-friendly, menu-driven, PC mode. This code is very useful in assessing time-dependent changes in plant risk due to changes in TS allowed outage times (AOTs), surveillance time intervals (STIs), and testing schemes. It will be available to NRC IBM PC/XT users in about April 1988.

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Memorandum from Charles E. Rossi to Hubert J. Miller entitled "Technical Specification Requirements for Channel Calibration as Applied to Temperature Sensors."

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