

TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM HIGHLIGHTS

This is the third issue of TECHNICAL SPECIFICATIONS IMPROVEMENT PROGRAM HIGHLIGHTS. These highlights are being issued regularly by the Technical Specifications Branch to keep both Headquarters and Regional personnel 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 to Millard Wohl, Mail Stop 516, extension 27458.

° STAFF ASSESSMENT REPORT ISSUED ON PHASE I AND PART OF PHASE II OF B&W OWNERS GROUP TECHNICAL SPECIFICATION PROGRAM

On February 16, 1987, the B&W Owners Group (B&WOG) submitted the results of its Phase I activities to improve Technical Specifications (TS) for staff review. The goal of the B&WOG improvement activities is to develop new Standard Technical Specifications (STS). The B&WOG submittal included model specifications, including an improved Bases for the new STS, and supporting documentation for changes from the existing STS. The submittal also included a discussion on the application of the Policy Statement criteria on TS content to some of the current STS. After the new STS are completed, they can be referenced by owners of B&W-designed plants who wish to upgrade their plant-specific TS.

The purpose of the staff review was to assess whether the scope and level of detail provided would be sufficient for the new STS being developed. Although a number of generic considerations are yet to be finalized through future interaction with the B&WOG on the new STS, the staff's assessment of the Phase I and part of the Phase II results concluded that they provided an acceptable basis for proceeding with the remainder of Phase II activities to review the entire STS. The staff assessment report was issued by NRR in a letter to the Chairman of the B&WOG on September 4, 1987.

CONTACT: Samuel E. Bryan, x29929

° WORKING GROUP NAMED TO INTERACT WITH INDUSTRY GROUP DEVELOPING CRITERIA AND GUIDELINES FOR 10 CFR 50.59 REVIEWS

Following a Technical Specification (TS) improvement briefing involving the relocation of TS requirements to documents controlled by 10 CFR 50.59, the Commission directed the staff to work with industry to develop criteria and guidelines for conducting 50.59 reviews and to give these criteria and guidelines regulatory status. On July 13, 1987 the Associate Director for Inspection and Technical Assessment established a 10 CFR 50.59 Working Group to interact with an industry counterpart working group sponsored by NSAC and NUMARC.

The Working Group has met with management in three NRC regional offices to obtain their views on problems and difficulties that licensees are having implementing 10 CFR 50.59. The regions have also identified individuals to interact with the Working Group to provide comments on the criteria and guidelines and to discuss issues as they arise.

The Working Group has obtained comments on the industry's first draft of criteria and guidelines and also has met with industry counterparts to discuss those comments. The NSAC/NUMARC Working Group plans to revise the draft and provide it to the industry at large and to NRC for additional comments.

Anyone wishing additional information on the activities of the Working Group may contact any of the following members:

Bob Hasse	Region III
Ed Tourigny	PDII-2
John Craig	DEST
Charles Haughney	DRIS
Sam Bryan	DOEA

CONTACT: Samuel E. Bryan, x29929

° REVIEWS BY THE ONSITE SAFETY REVIEW GROUP

Current standard requirements for the makeup of the onsite safety review group (OSRG) are listed in Section 6.0 of the STS. These requirements have evolved through years of reviews, and they embrace two basic principles. The first principle is that safety reviews are conducted by a multi-disciplinary group. The second principle is that the review group is comprised of experienced, technically competent individuals.

The typical onsite review group generally consists of the plant manager plus the individual from the highest supervisory position in each of the key technical disciplines at the plant. This membership ensures that changes, tests, experiments, and procedures are reviewed by people with enough experience and training to recognize and anticipate unwanted interactions that might affect safety. The group should be multi-disciplinary to ensure that people with different perspectives evaluate the safety significance.

Not only has the scope of the review responsibilities of the OSRG increased over the years, but the review material within this scope has proliferated almost without bounds since the TMI-2 accident. The resulting increase in the number of reviews required has seriously burdened key supervisory personnel to the point where it could impact their ability to carry out other line safety responsibilities.

To alleviate this problem, some licensees have proposed changes to their TS that alter the scope of what gets reviewed by the OSRG and, consequently, how and by whom certain changes, tests, experiments, and procedures are reviewed. Therefore, some of these proposals fail to embrace the two key review principles embodied in the STS.

The scope of what is reviewed by the OSRG can be modified and safety maintained provided appropriate review techniques are established for changes, tests, experiments, and procedures that would no longer be reviewed by the OSRG. However, these alternative review techniques must embrace the review principles embodied in the STS discussed above. The Technical Specifications Branch should be consulted before any requests from licensees to alter the review charter of the onsite review group where these principles could be compromised.

CONTACT: Frederick R. Allenspach, x28402

° NEED A TECHNICAL SPECIFICATION INTERPRETATION? - PART 2

Issue No. 87-02 of "Highlights" indicated that the Technical Specifications Branch is responsible for Technical Specification interpretations. The response to this comment has been overwhelming, with several people reminding us that we forgot a few points.

First, as the project managers reminded us, the line of communication is intended to work like this: If a licensee has a question about the meaning of a TS, the question should be discussed with the NRC resident inspector. If the resident inspector needs help, he/she should discuss the issue with his/her regional management. If the interpretation is still not clear, the resident or regional staff should consult with the project manager, and the project manager will involve the Technical Specifications Branch and/or other branches, as necessary, to address the issue. This is the appropriate line of communication for plant-related TS interpretations.

Second, the members of the Technical Specifications Branch are assigned to specific vendor teams. These are as follows:

Westinghouse -	Tom Dunning, x28434 Cal Moon, x28053 Dave Langford, x27472
General Electric -	Kulin Desai, x27952 Stu Brown, x28172
Combustion Engineering -	Millard Wohl, x27458 Bob Giardina, x28543
Babcock & Wilcox -	Sam Bryan, x29929 Jim Miller, x28432 Bernie Mann, x28563

Questions regarding TS interpretations should be referred to a member of the appropriate vendor team.

Third, we do not intend to distribute the background books for previously issued TS interpretations outside the Technical Specifications Branch at this time. Some of the memoranda in the background books may be contradictory, out-of-date, or pre-decisional in an ongoing enforcement action. We are planning to "clean up" the background books and may issue them as a "Code of TS Interpretations" at some future date.

Finally, and not to discourage requests for interpretations, we believe that the TS (especially the STS) clearly state requirements (LCOs, Action Statements, and SRs) most of the time. Careful examination of the TS wording within the context of common usage of the English language, along with the intent of the TS from the Bases, should normally be enough to draw a clear picture of what must be done to meet the TS. Therefore, people should carefully review the TS and its Bases before calling the Technical Specifications Branch.

CONTACT: Richard L. Emch, x29601

° RECENT TS INTERPRETATION

By a memorandum dated September 9, 1987 from Bob Giardina, OTSB, to Rich Emch, OTSB, a TS interpretation was made concerning "Entering TS 3.0.3 as a Result of Inability to Meet ESFAS System Response Times (TS 3/4.3.2)." In the particular case addressed, a valve was gagged, making it impossible to meet the ESF response time test. The valve was inoperable, not the instrumentation, and the 3.3.2 Action Statements were silent on response time failures. Further, the valve was not covered by any other TS. We concluded that TS 3.0.3 must be invoked.

However, the problem actually occurred because reference to the valve had been taken out of another appropriate section of the TS by amendment. Had the valve been covered in the other appropriate TS, the Action Statement from that TS would have allowed some operational flexibility.

The important lesson to be learned from this occurrence is that there is a reason behind every TS, and we (NRC) have to examine that reason carefully before granting a TS change. Taking a component out of a TS can sometimes create a problem.

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