

TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM HIGHLIGHTS

This is the fourth 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 11F23, extension 21181.

NRC STAFF DEFINES CONTENT OF NEW STANDARD TECHNICAL SPECIFICATIONS

The NRC and industry have completed a major milestone in the overall Technical Specifications Improvement Program. The staff issued the TS "Split" Report on May 9, 1988 to four reactor vendor Owners Groups specifying the appropriate content of the new STS based on the Commission's Interim Policy Statement on Technical Specifications Improvements.

Based on its review, the staff concluded that a significant reduction can be made in the number of Limiting Conditions for Operation (and associated Surveillance Requirements) that must be included in the STS (i.e., 45% for PWRs, 40% for BWR/6 and 35% for BWR/4). The staff's goal is to assure that the new STS contain only requirements that are consistent with the Policy Statement and 10 CFR 50.36 and have a sound safety basis.

The development of the new STS based on the staff's conclusions will result in more efficient use of NRC and industry resources. Safety improvements are expected through more operator-oriented Technical Specifications, improved Technical Specification Bases, a reduction in action statement-induced plant transients, and a reduction in testing at power. Additional improvements are expected to be achieved through the application of good human factors practices to TS format, writing, and structure.

The NRC staff and the industry also have underway a parallel program of specific line item (single issue) improvements to both the scope and substance of the existing Technical Specifications. The NRC will continue to actively identify and pursue the development of specific line item improvements to TS and will make these improvements immediately available to licensees without waiting for the new STS. The NRC staff will continue to interact with the NUMARC Technical Specification Working Group and each of the individual vendor Owners Groups as needed to keep this important program moving forward.

CONTACT: Kulin Desai, x21166

° STAFF ISSUES GUIDANCE TO INDUSTRY ON IMPLEMENTATION OF THE NEW
STANDARD TECHNICAL SPECIFICATIONS UNDER DEVELOPMENT

On April 12, 1988 NRC management met with the Owners Groups management representatives to hear their comments regarding the "NRC STAFF RESPONSE TO NUMARC TECHNICAL SPECIFICATIONS WORKING GROUP KEY IMPLEMENTATION ISSUES FOR RESTRUCTURED TECHNICAL SPECIFICATIONS," dated January 22, 1988. The Owners Groups later documented these comments by letter from NUMARC, dated April 26, 1988. The meeting and subsequent letter concluded a series of correspondence and discussions on the following issues:

1. The degree to which plant-specific restructured technical specifications should conform to new Standard Technical Specifications
2. Minimizing the expenditure of resources in satisfying the requirements of 10 CFR 50.91 and 10 CFR 50.92 (SHOLLY) for plants converting to the new STS
3. The need to revise 10 CFR 50.36a in order to allow relocation of radiological effluent controls from Technical Specifications
4. Controls necessary for requirements relocated from the Technical Specifications
5. Content and control of improved Bases.

The Owners Groups indicated that the staff's and industry's efforts on the Key Implementation Issues were in very close agreement and that they were pleased even if there was not 100% agreement. The staff agrees that there is substantial agreement and believes that the nature of the remaining differences is about what would be expected at this stage of the effort. These minor differences will be resolved as the staff and industry gain more experience developing new Standard Technical Specifications (STS). The Owners Groups plan to submit the new STS topical reports to the NRC staff for review in early 1989.

CONTACT: Mark Reinhart, x23139

° NRC STAFF PROVIDES GUIDANCE TO INDUSTRY ON STANDARD FOR CONDUCTING
10 CFR 50.59 REVIEWS

As reported in the October 1987 Technical Specification Improvement Program Highlights, the NRC Working Group for improving the quality of 10 CFR 50.59 evaluations has been interacting with an industry counterpart group that is writing a 10 CFR 50.59 Guidance Document. The industry group is made up of members from the NUMARC and NSAC organizations. Their objective is to write a guidance document that provides definitive guidance for:

- identifying the changes, tests and experiments (CTE) that must be reviewed under 10 CFR 50.59,

- measures to assure that CTE are adequately evaluated and reviewed for safety,
- methods of conducting adequate evaluations for determining whether or not an unreviewed safety question is involved in the CTE, and
- documenting the reviews.

The first draft of the NUMARC/NSAC 10 CFR 50.59 Guidance Document was reviewed by the NRC Working Group, and comments were given to NUMARC/NSAC and discussed with them at a September 23, 1987 meeting of the two groups. On November 23, 1987 a revised Guidance Document was distributed to the industry at large and returned to the NRC for staff review and comment.

In a letter to Mr. Thomas E. Tipton of NUMARC, dated May 12, 1988 the staff provided formal comments back to industry on this latest draft. The staff identified five key issues which it believes should be better addressed in the Guidance Document before the staff could endorse the guide. These issues address:

1. Margin of Safety
2. Consequences of an Accident or Malfunction of Equipment
3. Changes to Procedures as Described in the SAR
4. Importance to Safety
5. Licensing Basis

The staff believes that the discussion of these issues as currently presented in the Guidance Document could lead to confusion when utilities attempt to implement the guidance. An understanding of how the NRC believes each issue relates to 10 CFR 50.59 is fundamental to the preparation of a useful Guidance Document.

NUMARC/NSAC is now revising the Guidance Document in response to comments from utilities and other industry organizations as well as those received from the NRC. The staff anticipates receiving a new revision of the draft document for another round of comments during the summer of 1988.

CONTACT: Samuel E. Bryan, x23137

° INDUSTRY ALLOWED TO RELOCATE ORGANIZATION CHARTS OUTSIDE OF TECHNICAL SPECIFICATIONS

A Generic Letter has been issued (G.L. 88-06) which permits the removal of organization charts from Technical Specifications (TS). This line item TS improvement was proposed by industry, with Shearon Harris as the lead plant, and approved. The Generic Letter identifies key organizational characteristics that must be described in Technical Specifications in lieu of the organization charts.

Licensees may immediately take advantage of this Technical Specification improvement by submitting a conforming license amendment. To facilitate the processing of license amendments to implement this change, a model Safety

Evaluation Report (SER) and a copy of the Shearon Harris "No Significant Hazards Consideration" (NSHC) pre-notice were provided to Project Managers with the Generic Letter.

This and other line item improvements will be factored into the new STS being developed by the vendor Owners Groups as part of the Technical Specification Improvement Program.

CONTACT: Tom Dunning, x21189

° WHAT ARE THE CURRENT STANDARD TECHNICAL SPECIFICATIONS (STS)?

OTSB is frequently asked, "What are the current Standard Technical Specifications?" In order to answer this question it may be helpful to review the methodology used to maintain STS current.

STS for each vendor were published as a NUREG:

1. NUREG-0103, Revision 4, Babcock & Wilcox PWR, dated fall of 1980
2. NUREG-0123, Revision 3, General Electric, dated December 1980
3. NUREG-0212, Revision 2, Combustion Engineering, dated December 1980
4. NUREG-0452, Revision 4, Westinghouse PWR, dated fall of 1981

While no revisions have been published to these NUREGs since 1981, many new plants have been licensed since then. This licensing activity resulted in changes to STS because of new requirements, new staff guidance, clarifications, corrections, and valid operational relief. The changes have been recorded as pen and ink changes to STS and have been incorporated into each set of new NTOL Technical Specifications (TS).

During 1987, OTSB consolidated the changes to the Westinghouse STS to create a document referred to as Revision 4a. While this Revision 4a has not yet been published as a NUREG revision, it was sent to Texas Utilities Electric Company on August 14, 1987 for use as a model (starting point) to develop the Comanche peak, Unit 1 TS. (This document is available from the Public Document Room by citing Accession Number 870818-0296.) The staff considers Revision 4a to be the "current" STS for Westinghouse plants.

For B&W, GE, and CE plants, a compilation of STS changes, such as the Westinghouse Revision 4a, has not been developed. For these plants, the current STS consist of a combination of Westinghouse Revision 4a Technical Specifications (for portions of TS which are the same for all plants), portions of the last published revision of the STS NUREG for the applicable vendor, and the Technical Specifications that were issued to licensees of the last few NTOLs for that vendor line.

At this time, efforts are in progress through the Technical Specification Improvement Program to develop new STS which will be entirely rewritten. For a list of the specifications to be contained in the new STS, see letter from Dr. T. E. Murley, NRC to Mr. R. W. Newton, Westinghouse Owners Group, dated May 9, 1988.

CONTACT: Rich Emch x21186