

TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM HIGHLIGHTS

This is the fifth 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 NRC program to implement the Commission's interim Policy Statement on Technical Specifications Improvement. Comments or suggestions for future issues should be referred to Millard Wohl, Mail Stop 11F23, extension 21181.

° THE NRC STAFF MAKES SIGNIFICANT PROGRESS IN IMPLEMENTING THE TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM

There are three major elements of the NRC's Technical Specification Improvements Program. The first involves the development of new Standard Technical Specifications (STS) for each NSSS vendor design and voluntary adoption of them by licensees. The second consists of a parallel program of line-item improvements to Technical Specifications that are immediately made available to licensees regardless of whether or not they adopt the new STS. These line-item improvements are normally implemented by issuing a generic letter notifying licensees that the improvement is available or by the staff approving a topical report submitted by the industry. The final element of the Tech Spec Improvements Program involves completion of a number of support activities necessary to fully implement the Commission's interim Policy Statement on Technical Specification Improvements. These support activities include the development of guidelines that specify what can get changed under 10 CFR 50.59 without prior staff approval and describe how 50.59 reviews should be done.

The staff's progress in each of these three areas is described in the rest of this issue. The goal of the Tech Spec Improvement Program is to improve operational safety by:

- Reducing the size and complexity of Tech Specs in a way that focuses Tech Specs on the most safety significant requirements,
- Making Tech Specs more understandable to operations personnel,
- Improving specific technical requirements and providing a clearer link with the safety analysis, and
- Reducing operational transients and challenges to safety systems such as those caused by scrams during testing.

° NEW STS TO BE SUBMITTED TO THE STAFF IN APRIL 1989

Industry has committed to submit four new STS topical reports, one for each NSSS vendor owners group--Westinghouse, Babcock and Wilcox, Combustion Engineering, and General Electric--in April 1989. These new STS are to place emphasis on items of most safety significance, are to contain improved bases, and are to be formatted in a more operator oriented manner.

The staff is developing a process to review the new STS and provide feedback to industry so that approved new STS can be issued by the end of the year. The process makes provision to start five lead plants toward conversion to the new STS in September 1989.

CONTACT: Mark Reinhart, x23139

° NUMEROUS LINE-ITEM IMPROVEMENTS ARE NOW AVAILABLE TO LICENSEES

The staff has made considerable progress in the area of approved line-item TS improvements. Examples are discussed below:

- GENERIC LETTER 88-12 ISSUED ON REMOVING FIRE PROTECTION REQUIREMENTS FROM TECHNICAL SPECIFICATIONS

On August 2, 1988, Generic Letter 88-12 was issued to provide additional guidance to licensees and applicants on removing fire protection requirements from Technical Specifications (TS). This guidance was developed based on a lead-plant proposal submitted on the Callaway and Wolf Creek dockets. The scope of the requirements removed from the TS and placed in the Fire Protection Program includes the specifications on fire detection and suppression, fire barriers, and fire brigade staffing. The two major requisites for removing fire protection requirements from TS are the incorporation of the NRC-approved Fire Protection Program into the FSAR and the replacement of any existing license conditions on fire protection with a standard license condition that was identified in Generic Letter 86-10. In addition, the Administrative Controls section of the TS were augmented to support the Fire Protection Program consistent with the manner by which the TS control other programs that are addressed by a license condition. A model prenotice and Safety Evaluation Report were provided to Project Managers to assist them in processing license amendment requests to implement this Generic Letter.

- GENERIC LETTER 88-16 ISSUED ON REMOVING CYCLE SPECIFIC PARAMETER LIMITS FROM TECHNICAL SPECIFICATIONS

On October 4, 1988, Generic Letter 88-16 was issued to provide guidance on removing the values of cycle specific parameter limits from TS. This guidance was based on a lead-plant proposal submitted on the Oconee docket. This change eliminates the need for a license amendment to update the values of cycle specific parameter limits

each fuel cycle and is applicable when the values of these limits are determined in accordance to an NRC-approved methodology. The TS retain the requirements to operate the unit within the limits for the cycle specific parameters that are now documented in a formal report. A copy of this report is provided to the NRC for information when it is issued; however, the elimination of the need for prior NRC approval of the values of these limits will result in a resource savings for both licensees and NRC staff. A model prenotice and Safety Evaluation Report were provided to Project Managers to assist them in processing license amendment requests to implement this Generic Letter.

- GENERIC LETTER 89-01 ISSUED ON TRANSFERRING RADIOLOGICAL ENVIRONMENTAL TECHNICAL SPECIFICATIONS TO OTHER DOCUMENTS

Generic Letter 89-01, dated January 31, 1989 provides guidance that will permit many of the procedural details of Radiological Environmental Technical Specifications (RETS) to be transferred to the Offsite Dose Calculation Manual (ODCM) or to the Process Control Program (PCP) for the solid radioactive wastes. At the same time programmatic requirements for control of radioactive effluents and for radiological environmental monitoring would be included in the Administrative Control Section of the Technical Specifications (TS). These programmatic requirements for RETS assure that TS include provisions consistent with the regulatory requirements of 10 CFR 50.36a. Finally, the TS requirements for reporting radioactive effluent releases, results of the radiological environmental monitoring program, and changes to radwaste systems were simplified by transferring existing procedural details to the ODCM or PCP. Guidance on preparation of a license amendment request to implement these changes in TS is provided in the Generic Letter. A model Safety Evaluation was provided to Project Managers to assist them in processing license amendment requests to implement this Generic Letter.

CONTACT: Thomas G. Dunning, x21189

- SAFETY EVALUATION REPORTS (SERs) ISSUED FOR TOPICAL REPORTS ON GENERIC SURVEILLANCE TEST INTERVAL (STI) AND ALLOWED OUTAGE TIME (AOT) EXTENSIONS

The staff has recently issued several Safety Evaluation Reports (SERs) on the following instrumentation-related topical reports, approving methodologies and extensions of STIs and AOTs.

1. NEDC-30851P, Supplement 1, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," June 1986.
2. NEDC-30851P, Supplement 2, "Technical Specification Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," July 1986.
3. NEDC-30936P, "BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation), Part 1," November 1985.

4. NEDC-30936P, "BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation) Part 2," June 1987.
5. BAW 10167, "Justification for Increasing the Reactor Trip System On-Line Test Intervals," May 1986.

Most STI extensions permitted by the SERs are from 1 month to 3 months, with a wide variety of vendor-specific AOT extensions.

CONTACT: Millard L. Wohl, x21181

° NRC STAFF REVIEWING INDUSTRY PROPOSAL GUIDANCE DOCUMENT FOR CONDUCTING 10 CFR 50.59 REVIEWS

The NRC Working Group on 10 CFR 50.59 is actively working to develop guidelines for conducting safety evaluations in accordance with 10 CFR 50.59. An early draft guidance document, prepared by industry, was reviewed by the NRC Working Group and staff comments on that draft were provided to NUMARC/NSAC in a letter to Mr. Thomas E. Tipton, dated May 12, 1988. NUMARC/NSAC revised the guidance document in response to comments from utilities, other industry organizations, and from the NRC. NUMARC's proposed "final draft" was received in mid-November 1988. The "final draft" was widely distributed within the NRC for comment. The NRC Working Group has met to discuss the comments received and issues involved e.g., what constitutes a reduction in the margin of safety or an increase in the probability or consequences of an accident? The NRC Working Group is preparing proposed staff positions on these and other issues. The staff anticipates that it will be able to modify industry's final draft to make it an acceptable guidance document (and provide this document to NUMARC) by March 1989.

CONTACT: James R. Miller, x23140

° THE STAFF TAKES MAJOR STEP TOWARDS REDUCING TESTING AT POWER

The staff has undertaken a study of Technical Specification surveillance requirements to determine whether modifications to the test intervals should be made. The main emphasis of the review is on major mechanical equipment and safety-related instrumentation other than RPS and ESFAS (The RPS and ESFAS test intervals are being adjusted based on detailed risk analyses conducted by the NSSS owners groups and reviewed by the staff). By studying equipment reliability and operating experience, the staff plans to establish safer surveillance intervals and strategies.

The objective is to improve operational safety by reducing or eliminating the testing of any equipment at power, where an acceptable level of equipment reliability can be achieved without such testing. Operational safety will be improved by implementing the recommendations that come out of this study because:

- The risks associated with the unavailability of safety equipment (availability being in part assured by the successful completion of surveillance tests) are being balanced against the risks from transients, such as scrams, and the associated challenges to safety systems. Technical Specification required surveillance testing accounts for approximately 14% of the total number of plant trips, trips that sometimes progress to more complicated events. Surveillance tests that have unnecessarily caused plant trips have been identified and their frequency will be reduced or eliminated.
- Consideration is being given to the adverse effects that excessive surveillance testing can have on equipment availability. Safety-related equipment can be worn or degraded by surveillance testing and consequently the equipment reliability and availability may decrease, as opposed to be assured, by doing the test.
- Surveillance tests are being evaluated to see if their safety significance justifies the radiation exposure that plant personnel receive in performing the test.
- By reducing the number of unnecessary tests, plant personnel will be better able to do other, more safety significant, work.

On January 6, 1989, the staff briefed the Commission on its efforts to reduce testing at power, including presentation of the draft study findings and recommendations. A draft report on "The Feasibility of Reducing Technical Specification Surveillance Testing" has been circulated for comment within the NRC. A final report should be issued as a NUREG in the spring of 1989. The staff plans to prepare one or more generic letters to the industry advising them that licensees may propose changes to their Technical Specifications based on the recommendations of this report. Items selected for inclusion in the generic letters will be those whose safety significance appears to warrant expedited action. All of the recommendations will be factored into the new Standard Technical Specifications.

CONTACT: T. Robert Tjader, x21187