

December 13, 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 offer additional suggestions for preparing better applications for conversion to the improved standard technical specifications to facilitate the NRC staff's review process. These suggestions are based on recent experiences with applications currently under review and are meant to both clarify and supplement the extensive guidance contained in NEI 96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996.

The staff has adopted a team approach for conducting the conversion application reviews because of the many applications anticipated over the next two years. This approach spreads the review of each application among five or six staff members, each reviewing parts of several applications concurrently. The staff has not previously been prescriptive regarding the organization of the conversion applications, but has allowed each applicant to devise its own "system." The result is that a new "system" must be learned for each application. Thus, a reviewer that is concurrently assigned TS sections from several applications must learn an additional system for each application. We have observed that the burden of following numerous systems of organization and nomenclature slows the conversion review process. To promote a more efficient review process, we request that the Technical Specification Task Force use the suggestions in the enclosure and develop additional guidance for licensees to supplement NEI 96-06.

Sincerely, Original Signed by:
C. I. Grimes
Christopher I. Grimes, Chief
Technical Specifications Branch
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosures: As Stated

cc: D. Hoffman, EXCEL
B. Mann, BG&E Co.
A. Maron, PP&L
H. Pontious, CECO
C. Szabo, Entergy Ops.
B. Ford, Entergy Ops.

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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. I. Grimes", is written over the typed name.

Christopher I. Grimes, Chief
Technical Specifications Branch
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosure: As Stated

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ADDITIONAL GUIDANCE FOR PREPARING AN APPLICATION
FOR CONVERSION TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

Organization

Organize the application into self contained parts corresponding to each improved technical specification (TS) section to facilitate the assignment of individual sections among multiple reviewers.

Please include a copy of the markup of the current TSs in current TS order. Many reviewer questions during past conversion reviews resulted from misunderstandings that reference to such a markup would have quickly resolved.

Markup of the Current TSs

Number discussions of change (DOCs) as described in the guidance in NEI 96-06, Attachment 1. Categorize changes strictly according to the definitions for the change categories denoted by the prefixes R-, A-, L-, LR-, and M-, and use these prefixes to number the changes in each section. Use of general change prefixes when appropriate, as described in Attachment 1, is encouraged. Use of subscripts (e.g., L₅) for numbering the DOCs is discouraged. The application is easier to review when the DOCs for improved TS Sections 3.1 through 3.9 (or 3.10 for BWR/4 plants) are numbered on an LCO/specification basis instead of on a section basis.

The current TS markup is easier to review when each DOC number is written in a circle in the right-hand margin of the page and the associated text is delineated with a border line. The association of the text within the border to the correct DOC can be unambiguously established by drawing a line connecting the text border to the DOC. The improved TS number for a current TS requirement should be written in the left-hand margin adjacent to the corresponding text to facilitate comparison of the current TS requirement to its presentation in the improved TSs.

If a page of the current TSs contains requirements for more than one LCO/specification in the improved TSs, it should be marked up separately for each improved TS LCO/specification, with cross reference to the other specification(s). The practice of denoting all changes on such a current TS page with a single markup of the page has proven confusing.

The current TS pages (and any insert pages) corresponding to each improved TS specification should be paginated by hand in the "Page # of #" format.

ENCLOSURE

Adoption of Topical Reports

A proposed change from the current TS based to incorporating an NRC-approved topical report as a reference, must be based on a plant-specific license amendment or safety evaluation which documents how the plant conforms to the conditions for adopting the topical report, as described in the NRC evaluation approving the topical report. Conversion applications incorporating topical report references that previously did not exist in the technical specifications, should specifically reference the NRC approval basis for the plant-specific application.

Conversion Scope

On several occasions, licensees have characterized "beyond scope" changes to the plant design basis or license requirements as "less restrictive" requirements related to the conversion. The categories of "less restrictive" and "more restrictive" changes were intended to apply only to those changes needed to conform to the STS. For example, it is inappropriate to characterize a change in an applicable ASME Code as a "less restrictive" requirement associated with the conversion, instead of applying for a relief request pursuant to §50.55a.

ENCLOSURE