



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

OG-161

October 17, 1985

Mr. Hugh Thompson
U.S. Nuclear Regulatory Commission
Phillips Building
Washington, DC 20555

Subject: Westinghouse Owners Group
Short Term Tech Spec Improvement Efforts

Reference: 1. OG-152, 6/14/85
2. AIF Subcommittee on Tech Spec Improvements, 10/1/85
3. Recommendations for Improved Tech Specs, 9/30/85

Dear Mr. Thompson:

Reference 1 transmitted to the NRC a collection of comments on Revision 5 of NUREG-0452, Standard Technical Specifications for Westinghouse PWR's. These comments were developed by the Westinghouse Owners Group and represent what we believe to be significant technical specification improvements that can be achieved within the existing regulatory and review process within a relatively short time. These so-called "short term" improvements are wholly consistent with parallel industry activities within AIF (Reference 2) and have also been endorsed by the NRC's Technical Specification Improvement Project in Reference 3.

Since the Reference 1 submittal, the comments on NUREG-0452 have been prioritized and where there were multiple comments on the same spec they were combined into one consensus comment. Attached to this letter are the most significant comments from the first cut comments contained in Reference 1.

The Westinghouse Owners Group desires to take action to incorporate these improvements into Westinghouse plant technical specifications. Although these comments were developed from reviewing the Rev. 5 Standard Technical Specifications, many of them also apply to early versions of the standard as well as to custom technical specifications of older plants. As a first step in achieving this objective we request a meeting with the appropriate NRC personnel so that the process for achieving these technical specification improvements can be agreed upon. Furthermore, the WOG hopes that this meeting can be held as soon as possible. We therefore suggest that we contact you by October 23, 1985, to agree on a date for the meeting.

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Mr. Hugh Thompson

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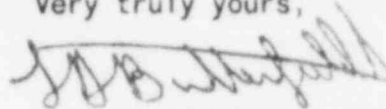
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In summary, it is the intent of the WOG to work with the NRC to accomplish short term technical specification improvements in parallel with the current industry effort. In preparation for the suggested meeting, at which we will present the WOG's detailed short term objectives to the NRC, you may wish to use the attached WOG comments as an indication of the types of improvements sought. The WOG will keep the AIF Subcommittee informed of these activities.

The WOG appreciates the NRC interest and activities in these areas and the courtesy of the NRC in inviting WOG participation. If the WOG can be of further assistance, or if you have any comments or questions please feel free to contact either Mark Burzynski or me. Thank you.

Very truly yours,



L. D. Butterfield, Chairman
Westinghouse Owner's Group

RCH/TAL

Enclosure

cc: WOG Representatives
WOG Tech Spec Subcommittee
WOG TSIP Task Force

ATTACHMENT A

Comments by Specification

A. Definitions

- 1.6 Channel Check - A bases needs to be provided for this definition which addresses conditions where the channel normally reads 0 or is pegged high. The bases also needs to address channel to channel differences which are expected to occur.
- *1.9 Core Alteration - A bases needs to be provided for this definition which addresses movement of things such as irradiation specimen, inspection cameras, moveable detectors, etc. This definition should not require a core alteration to include movement of such devices.
- *1.29 Shutdown Margin - Requiring consideration of the most reactive rod for shutdown conditions constitutes an unnecessary restriction. Shutdown margin needs to be redefined to eliminate this requirement. Shutdown margin should be redefined, also, to address stuck rods, that is, if a rod is stuck it is excluded from consideration for satisfying shutdown margin requirements.

Table 1.2 Operational Modes - The mode change between Modes 2 and 3 needs better definition.

B. Limiting Safety System Setpoints

Table 2.2-1 - It is recommended that the equations for OP-Delta-T and OT-Delta-T be deleted from the technical specifications.

C. Section 2.0 Bases

- * Industry practice is that design pressure is given in terms of psig. Therefore 125% of 2485 psig is 3107 psig. It is recommended that this value be included in the bases as was the case in NUREG-0452 Revision 4.

D. Applicability

3.0.3 - The phrase, "within 1 hour action shall be initiated" should not imply that a power ramp down must begin within one hour. Rather, the interpretation that is recommended is that this action consists of readying plant personnel and appropriate systems such that when the power ramp down does begin all is ready. It is recommended that the bases be revised to reflect this interpretation.

3.0.4 - It is recommended that this requirement be revised such that a startup or a restart is allowed provided the action is complied with.

4.0.2 - The bases for this requirement needs to be expanded to address requirements that say, "prior to exceeding" or similar words. It is recommended that the surveillance extension be applicable to these sections as well.

- * 4.0.3 - It is recommended that in the event a surveillance is discovered to have been missed and the specified interval exceeded the action be to enter the Action Statement and provided the surveillance be completed within the action time, power operation be allowed to continue.

E. Reactivity Control Systems

- * 3/4.1.1.1 Shutdown Margin - Delete 4.1.1.1.1.a. It has been recommended that the shutdown margin definition be revised to address stuck rods. Assuming this is done, this requirement is no longer required. Also, this surveillance specifies action. Including action requirements in surveillances is detrimental to proper technical specification usage. Delete 4.1.1.1.1.b. This repeats an existing LCO and is therefore confusing. The bases for the rod insertion limit specification could be expanded to explain that in Modes 1 and 2 critical, compliance with this specification ensures satisfactory shutdown margin. It is recommended that surveillance 4.1.1.1.2 be deleted. This requirement does not appear to be associated with the LCO. It contains actions and is a once per cycle concern. The impact or removal of this specification is not thought to be significant to maintenance of safe plant operation. It is thought that this requirement is better controlled outside of the technical specifications.

- * 3/4.1.1.2 Shutdown Margin - Delete 4.1.1.2.a. This requirement is unnecessary since Mode 5 Keff requirements and shutdown margin requirements preclude consideration of a stuck rod. Additionally the revised shutdown margin definition would eliminate the need for this requirement.

3/4.1.1.3 Moderator Temperature Coefficient - It is recommended that this specification be deleted. Surveillance is performed only twice during a cycle. Typically the MTC is specified by design and the analyses performed at a more conservative value.

- * 3/4.1.1.4 Minimum Temperature for Criticality - It is recommended that the action time be revised to 2 hours in recognition of the difficulty at low power to rapidly change temperature without affecting other critical parameters.

3/4.1.2.3.4 Charging Pumps - It is recommended that this specification be deleted since the LCO and action are redundant to 3/4.1.2.1 and 2. No special surveillance is required since for this function, Section XI testing is sufficient to demonstrate operability.

3/4.1.2.6 Borated Water Sources - It is recommended that the action time for RWST restoration be revised to allow 8 hours to recover level and 24 hours to recover temperature and boron concentration. The current action time of 1 hour does not allow sufficient time to take corrective action and in the case of boron confirmatory measurements. In most cases violations of these requirements are minimal and do not constitute a threat but do require some time to recover.

- * 3/4.1.3.1 Control Rods - It is recommended that the new control rod specification previously provided be incorporated. Additionally it is recommended that shutdown rods be allowed to be inoperable, if trippable, indefinitely. This is in recognition that shutdown rods are parked and not used for reactivity control and their inoperability, if trippable, is of no consequence. It is recommended that Action c.3 be modified to state that the restrictions on Shutdown Margin surveillance and power level are applicable only until the flux map and analysis evaluation are completed. Thereafter, operation would be in accordance with the results of the evaluation.

3/4.1.3.4 Rod Drop Time - It is recommended that this requirement be deleted from the technical specifications. This requirement is demonstrated during startup and must satisfy startup test acceptance criteria. Including it in the technical specifications does little or nothing to ensure safe plant operation.

F. Power Distribution Limits

- * 3/4.2.1 Axial Offset - Remove the phrase, "until the indicated AFD is within the above required target band" in action c as it is contradictory to the LCO. Instead of referring to "0% at the end of the cycle life" in 4.2.1.4, revise to state, "percent predicted value at the end of the cycle life". This allows utilities for which AFD will not be 0% at the end of life, to establish a more realistic Delta-I band. It is recommended that if the installed AFD system is capable of manual update, the option to do so in lieu of 24 hour monitoring be allowed. It is recommended that the action times be extended to 1 hour to allow a more reasonable response time.

3/4.2.2 FQ - It is recommended that the grid locations be deleted. The exception could be, "3) Within + 2% of grid plane regions, inclusive, and". This information is not required for technical specification purposes and could prevent a 50.59 reload unnecessarily. It is recommended that the 15 minute action time be revised to 1 hour.

- * 3/4.2.3 FDelta-H - It is recommended that this specification be revised to just an FDelta-H requirement. Since rod bow penalties are no longer required to be in technical specifications the rod bow penalty vs flow tradeoff is no longer applicable.

3/4.2.4 Quadrant Power Tilt - It is felt that this specification is too complicated and could be greatly simplified. Also it is recommended that if flux maps show that no peaking factor limits are violated, then no further action is required. It is recommended that 4.2.4.2 be deleted since this is in conflict with the definition of QPT which requires use of 3 NI's for QPT monitoring if one NI is inoperable.

3/4.2.5 DNB Parameters - It is recommended that RCS flow measurement requirements be moved to Specification 3/4.4.1.

G. Instrumentation

- * Table 3.3-1, Action 5 - Revise this action to address the failure of both source ranges.

Table 3.3-1, Action 2.c. Delete this requirement. This is redundant to surveillance requirement 4.2.4.2 and incorrectly links failure of a protective feature to failure of an indication feature. The two are not necessarily the same.

Table 4.3-1, Table Notation

Notation (3) - Add the following sentence. For this surveillance requirement, M (monthly) is defined as at least once per 31 EFPD.

Notation (6) - Eliminate the reference to 75% power. Recent testing has demonstrated that flux maps at less than 50% are sufficient to demonstrate acceptable operation. Also add the following sentence. For this surveillance requirement, Q (quarterly) is defined as at least once per 92 EFPD.

Notation (12) - Eliminate the response time from this notation.

- * Table 3.3-3, 4 and 4.3-2 - Delete references to P-14 since this is already incorporated as an ESF function and causes confusion since requirements for the two functions are different. Auxiliary feedwater manual start should only be applicable to plants with an initiation feature which aligns and starts the system and not to plants which merely have individual pump start switches.

Action 19 is incorrectly applied to items 6.f, g, h of Table 3.3-4 since Action 19 forces the plant to cold shutdown and the applicable modes for these functions are Modes 1 and 2 or Modes 1, 2, and 3.

3/4.3.3.1 Radiation Monitoring - It is recommended that this specification be deleted as a separate specification. Instead, a simplified set of Tables as discussed in item 8 of Attachment B. Additionally, only those channels with safety functions or actuation should be included in the technical specifications. A rational need to be developed for establishing setpoints for radiation monitors included in the technical specifications. Problems have arisen where values inappropriate for operation were included in the specifications which resulted in either violation or later amendments.

3/4.3.3.1 Moveable Incore Detectors - It is recommended that the minimum number of thimbles be revised to 50%.

3/4.3.3.3 and 3/4.3.3.4 Seismic and Meteorological Instrumentation - It is recommended that these specifications be deleted and allowed to exist as programs. The relative importance of these systems is believed to be low considering safe plant operation and protection of the health and safety of the public.

3/4.3.3.5 and 3/4.3.3.6 Remote Shutdown and Accident Monitoring Instrumentation - It is recommended that these specifications be deleted as separate specifications and contained in the simplified instrument specifications described in item 8 of Attachment B. Action times and requirements for accident monitors should be made consistent with other instrument systems action times and requirements. They are currently too restrictive. A plant shutdown for loss of a monitor is believed to be too severe.

- * 3/4.3.3.8 Fire Detection Instrumentation - It is recommended that all Fire Protection Related Specifications be deleted from the technical specifications and allowed to exist as a program. An Appendix R program would be much more appropriate for these requirements.
- * 3/4.3.3.9 Loose Part Monitor - This specification should be deleted since it has no safety significance.
- * 3/4.3.3.10 & 11 Radiological Effluent Monitors - It is recommended that all RETS be deleted and allowed to exist as a program.

3/4.3.4 Turbine Overspeed Protection - It is recommended that this specification be deleted. In its place, a utility commitment to abide by the manufacturer's recommendation would be sufficient to maintain an acceptable level of reliability.

H. Reactor Coolant System

- * 3/4.4.1 Reactor Coolant System Heat Removal Paths - It is recommended that specification 3/4.4.1.2 be revised to allow exception to the requirement for no flow rod drop testing (cycle 1 only). It is recommended that the requirement to go to cold shutdown in action a. of specification 3/4.4.1.3 be deleted since it places the plant in a less desirable mode.

3/4.4.1.5 & 6 Isolated Loop - Consideration should be given to deleting specification 3/4.4.1.5 since initiation of an isolated loop is analyzed. Flow requirements contained in specification 3/4.4.1.6 should be deleted since the temperature limits is the critical parameter.
- * 3/4.2.1 Pressurizer Safety Valves - It is recommended that this specification be deleted. Operation on these modes is bounded by other technical specifications such as Cold Overpressure and RHR requirements.
- * 3/4.2.2 Pressurizer Safety Valves - Operation up to and including Mode 3 prior to performance of testing should be allowed to allow testing at normal ambient conditions as required. It is recommended that the 15 minute action be deleted, rather, require shutdown in 6 hours if the valve is not restored to operable status. It is recommended that consideration be given to increasing the tolerance on the lift setting, for example, to + 3%.
- * 3/4.4.3 Pressurizer - It is recommended that the pressurizer volume be changed to level to allow meter units to be used. Checking heater capacity every quarter is excessive. It is recommended that this become an 18 month surveillance requirement.

3/4.4.4 Relief Valves - It is recommended that the word seat be deleted from the action statements in recognition of other acceptable leakage paths. It is recommended that surveillance 4.4.4.1.b be deleted since this is required by Section XI of the ASME Boiler and Pressure Code. It is recommended that item 4.4.4.3 be bracketed to indicate the plant specific nature of the requirement.

3/4.4.5 Steam Generators - This specification should be deleted since it is redundant to the requirements of Section XI and is more appropriately contained in an inservice inspection program.

3/4.4.6.1 RCS Leakage Detection - Delete this as a separate specification and include in the simplified instrument specifications described in item 8 of Attachment B. This is appropriate since this is a monitoring system. It is recommended that the action be revised to all operation indefinitely if appropriate grab samples or other offsetting actions are taken periodically.

- * 3/4.4.6.2 RCS Leakage - It is recommended that reduced pressure testing and the 0.5 gpm leakage limit per 1/2 inch valve diameter be incorporated into the specifications. It is recommended that the requirement to test valve leakage within 24 hours following flow through the valve be revised to be less restrictive. This constitutes a significant burden to the operating utility and is not supported by plant experience. It is recommended that the valve list be deleted.

3/4.4.7 and 3/4.4.8 RCS Chemistry and Specific Activity - It is recommended that these requirements be deleted from the technical specifications and allowed to exist in a program much like the current secondary chemistry program.

- * Table 4.4-5 Capsule Removal Schedule - It is recommended that this requirement be deleted since it is specified by regulation (Appendix H).

3/4.4.9.2 Pressurizer - Relocate this specification to be with the other pressurizer specifications.

3/4.4.9.3 Cold Overpressure - It is recommended that RHR suction relief valves be added to the specifications as an additional mitigation system. In conjunction with this it is recommended that the option to use 1 PORV and 1 RHR system be acceptable for redundant paths, provided the two systems are independent. It is recommended that the special reporting requirement be deleted.

- * 3/4.4.10 Structural Integrity - It is recommended that this specification be deleted.

- * 3/4.4.11 RCS Vents - This specification should be revised to address just the head vent since the PORV's are addressed elsewhere and no utility (known to the commentators) utilizes a high point vent. Delete 4.4.11.1. This is required by Section XI.

I. ECCS

- * 3/4.5.1 Accumulator - It is recommended that the volume requirements be revised to levels to allow use of meter units. Delete the phrase, "by absence of alarms" from 4.5.1.1.a. to allow use of meters to satisfy the surveillance requirement. It is recommended that 4.5.1.2 be revised to require only one operable pressure and level channel per accumulator. This will prevent unnecessary shutdown resulting from the loss of a redundant instrument. It is recommended that the word "immediately" be deleted and the action time revised to 8 hours before starting a shutdown to allow the plant a reasonable time to attempt recovery. It is recommended that 4.5.1.1.d be deleted in recognition of the fact that with power to the valves removed, this function is useless.

3/4.5.1.6 and 3/4.5.1.2 Cold Leg Accumulators and Upper Head Injection - It is recommended that these specifications be deleted since 3/4.5.1.b is redundant to 3/4.5.1.a and most or all plants with UHI are actively trying to delete the system.

3/4.5.2 and 3/4.5.3 ECCS Subsystems - It is recommended that the special reporting requirements be deleted. An attempt should be made to limit all specifications on a particular system or component to one location. Revise surveillance 4.5.2.a to once per 31 days as is appropriate for valves secured in position by removal of power. It is recommended that RHR interlock requirements be deleted since they do not pertain to the ECCS function of the system

3/4.5.5 RWST - Delete. These requirements are already included in specification 3.1.2.6.

J. Containment Systems

- * 3/4.6.1.2 and 3 Containment Leakage and Air Locks - It is recommended that these requirements be deleted since they are required by regulation (Appendix J).

3/4.6.1.7 Containment Structural Integrity - Delete and include in the inservice inspection program where it would be more appropriately governed. This represents unnecessary detail in the specification.

3/4.6.1.8 Containment Purge - All qualified purge systems should be allowed to operate with restriction provided operability requirements are met. Revise surveillances 4.6.1.8.3 and 4 to require testing only if valves have been opened during designated period.

3/4.6.2.2 Spray Additive Tank - It is recommended that the volume requirements be revised to level requirements to allow use of meter units. Delete the phrase, "by chemical analysis" from 4.6.2.2.b.2 to allow alternate means of verification.

3/4.6.2.1 and 3/4.6.2.3 Containment Spray and Fan Cooler Systems - It is recommended that only one specification each for spray and fan coolers be included in the specifications regardless of whether or not credit is taken for iodine. Also it is recommended that all references to the other system (example, references to spray in the fan cooler specification) be deleted such that these specifications pertain only to the system for which the specification is filled. This would require revising actions a and b and deleting c. A review of these specifications reveals a benefit from linking the two systems. Also for the fan cooler specification revise 4.6.2.3.a.1 to require starting of "non-operating fans".

- * 3/4.6.4 Containment Isolation Valves - It is recommended that the requirements of specification 3.0.4 not be applicable to this specification. This would allow startup with penetrations isolated. It is recommended that the table be deleted and moved to the FSAR or other appropriate location. Revise surveillance 4.6.4.2 to allow testing in modes other than cold shutdown or refueling.

3/4.6.5.1 H2 Monitor - Delete this specification and include the H2 monitor in the simplified instrument specifications. Also delete requirement to perform a channel check since these normally read 0.

3/4.6.5.2 H2 Recombiners - It is recommended that all recombiner surveillance be performed at 18 month intervals.

3/4.6.5.4 H2 Mixing System - Revise surveillance 4.6.5.4.a to require starting of each non-operating fan.

3/4.6.7 Vacuum Relief - It is recommended that this specification be deleted.

The following 6 comments refer to Ice Condensers.

3/4.6.7.1 Ice Condenser - Revise the LCO to refer to ppm boron not ppm sodium tetraborate. Revise specification 4.6.7.1.b.1 to refer to 25 degrees-C instead of 20 degrees-C. Revise 4.6.7.1.b.3 to refer to a nominal 0.38 inches instead of greater than or equal to.

3/4.6.7.2 Ice Bed Temperature Monitoring - It is recommended that this specification be revised to all operation indefinitely provided the prescribed actions are taken.

3/4.6.7.3 Ice Condenser Doors - Revise 4.6.7.3.1 to refer to 50% in 9 months as opposed to 25% in 6 months. It is recommended that the lifting forces in surveillance 4.6.7.3.2 be deleted. The door has sufficient area that verifying freedom of movement is sufficient to demonstrate operability during accident conditions.

3/4.6.7.4 Inlet Door Position Monitoring - The action time of 14 days seems severe for the importance of the system.

3/4.6.7.5 Divider Barrier Doors - Make action time consistent with action time for Ice Bed, i.e. 48 hours.

3/4.6.7.7 Floor Drains - It is recommended that this specification be deleted and allowed to exist as part of the Section XI inservice inspection program.

3/4.6.7.9 Divider Barrier Seal - It is recommended that this specification be deleted and allowed to exist as a program.

The following comment refers to the subatmospheric containment.

3/4.6.5.2 Mechanical Vacuum Pumps - It is recommended that this specification be deleted since the critical parameter is containment pressure. Systems used to maintain the pressure need not have specifications.

K. Plant Systems

- * 3/4.7.1.1 Safety Valves - A modified version of this specification was provided in the previous WOG comments on draft Revision 5. It is recommended that this specification be implemented. It is recommended that Table 3.7-3 be deleted.

3/4.7.1.2 Auxiliary Feedwater - AFW pump testing should be done in accordance with Section XI, i.e., once per quarter as are other safety related pumps. Monthly testing seems unnecessarily restrictive. The phrase, "or when above 10%" in surveillance 4.7.1.2.1.a.4 should be changed to "and when above 10%".

- * 3/4.7.1.3 Condensate Storage Tank - It is recommended that this specification not be required for plants with qualified automatic backup capability if the automatic backup is tested. Revise volume requirement to level to allow use of meter units. Surveillance 4.7.1.3.2 should either be deleted if the backup system is included in technical specifications (e.g., essential service water) or revise action b to refer only to this requirement as a demonstration of operability of the backup system.

3/4.7.1.4 Specific Activity - Delete this specification and allow it to be included in an overall chemistry/activity control program such as secondary chemistry is now.

3/4.7.1.5 Main Steamline Isolation Valves - It is recommended that Modes 2 and 3 requirements be revised to allow more than 1 MSIV to be inoperable provided the valve is closed.

3/4.7.2 Steam Generator Pressure/Temperature - It is recommended that the LCO be revised to state that pressure must be less than or equal to 200 psig whenever temperature is less than or equal to 70 degrees-F. This would make the LCO and action consistent.

3/4.7.6 Flood Protection - It is recommended that this specification be deleted and allowed to exist as a program.

3/4.7.7 Control Room Ventilation - It is recommended that surveillance 4.7.7.a be deleted. This requirement is more appropriately included in specification 3/4.7.13. Alternately this requirement should be revised to

require monitoring only when the system is in operation if the concern is one of demonstrating proper operation. Verify proper temperature when the system is not operating is meaningless.

3/4.7.9 Snubbers - It is recommended that this specification be deleted and allowed to exist as a program.

3/4.7.10 Sealed Source Contamination - This specification should be deleted. It is not in keeping with the intent of the technical specifications.

3/4.7.11 Fire Protection - It is recommended that all fire protection specifications be deleted from the technical specifications and allowed to exist as a program.

3/4.7.12 Fire Rated Assemblies - It is recommended that this specification be deleted and included in an overall Appendix R program if compliance with the requirements is necessary.

L. Electrical Power Systems

3/4.8.1.1 Diesel Generators - It is recommended that Revision 5 be revised to include the concepts incorporated in recent plant specific revisions to this specification (e.g., North Anna).

3/4.8.3.1 Power Distribution - It is recommended that this specification be revised to optionally allow application of LCO's and actions of those components for which power is lost in lieu of the current action in this specification. This would satisfy the intent of the specification and would in some cases be less restrictive. Credit should be allowed for backup power supplies where they exist.

3/4.8.4.1 AC Circuits Inside Containment - The bases for this specification needs to be expanded so that its purpose may be known. Currently this is not clear. It is recommended that the table be deleted. In surveillance 4.8.4.1, is the requirement to have breakers opened and does the word tripped have special significance?

3/4.8.4.2 Containment Penetration Overcurrent Protection - It is recommended that this specification be deleted and allowed to exist as a program.

3/4.8.4.3 Thermal Overloads - It is recommended that this specification be deleted and allowed to exist as a program.

M. Refueling Operations

3/4.9.1 Boron Concentration - It is recommended that surveillance 4.9.1.1 be deleted since being in Mode 6 guarantees satisfaction of the requirements. Also delete the footnote since it merely repeats the mode definition.

3/4.9.5 Communications - The bases should be expanded to define direct communications. It is recommended that this include radio, gaitronic, phone, etc.

3/4.9.7 Crane Travel - It is recommended that the applicability be only with irradiated fuel in the storage racks.

3/4.9.8.2 RHR - It is recommended that the word "independent" be deleted from the LCO. Not all RHR trains are completely redundant from one another. Also it is recommended that the footnote allow RHR to be off for 1 of every 2 hour period for the initial core load.

3/4.9.9 Containment Purge - It is recommended that this specification be deleted and the appropriate requirements included 3/4.9.4.

- * 3/4.9.10 Reactor Vessel Water Level - It is recommended that this specification be revised or made into two specifications such that two conditions are allowed, which are; 1) for movement of irradiated fuel, must have 23 feet of water over vessel flange, and 2) for movement of control rods or drive mechanism, must have 23 feet of water over the irradiated fuel. This enhances rod unlatching and latching evolutions.

N. Special Test Exceptions

3/4.10.4 Reactor Coolant Loops - Revise to allow exception to specification 3/4.4.1.2 for no flow rod drop testing (cycle 1 only).

- * 3/4.10.5 Rod Position Indication - It is recommended that this specification be revised to take exception to the initial alignment of the rod position indicators.
- * 3/4.11 and 12 Radiological Effluent Specification - It is recommended that these specifications be deleted and allowed to exist as a program.

O. Bases

It is recommended that the bases be completely rewritten such that the stated intent may be satisfied.

P. Design Features and Administrative Controls

It is recommended that these sections be deleted and allowed to exist in the other forms in which they also currently exist.

ATTACHMENT B

General Comments

1. Resetting of Reactor Trip Setpoints - Several specifications require the resetting of reactor trip setpoints as part of an action statement, e.g., Power Range High Neutron Flux setpoint. The requirement is to reset all channels of the specified function, usually within 4 hours. It is recommended that this 4 hour time limit be increased. Utilities have experienced difficulty resetting all channels of a function within this time period. An additional 2 to 4 hours would eliminate the problem, allowing a controlled and methodical action response.
2. Consolidation of Equipment Requirements - It is recommended that the technical specifications be revised such that all requirements pertaining to a particular component or system be included in one location. This would eliminate the current problems associated with having requirements for a component or system located in several places in the technical specifications.
- *3. Radiological Effluent Technical Specifications - It is recommended that all radiological effluent technical specifications be removed from technical specifications and allowed to exist as a program.
- *4. Operable - Operability - A discussion needs to be added to the specifications which provides a detailed bases of the meaning of operable. This discussion needs to address performance of surveillance, support systems and support systems with their own technical specifications.
5. Response Times - It is recommended that response time testing be deleted from technical specifications. This suggestion is made in view of operational data which indicates that for many devices particularly electronic devices, response times do not degrade with time. Response time testing is time consuming and since it adds very little to the understanding of the plant constitutes an unnecessary burden.
6. Limiting Safety System Settings - It is recommended that the format for reactor trip and ESF setpoints be returned to that in revision 4 of NUREG-0452. It is recommended that the bases be modified to explain that trip setpoints and allowable values are applicable only to the setpoint and not to the reset point. The technical specifications should not be interpreted as bounding reset points. Instrumentation requirements need to be simplified. This could be accomplished by putting all instruments into 2 tables, one for setpoints and one for surveillance.
7. Parameter Values - It is recommended that technical specification values be in the units shown on the associated meter. For example, boric acid tank level would be specified in "%" instead of gallons.

- *8. Instrumentation - Action points need to be clear. All action should be based on either the total number of channels or the minimum number of channels. The Applicable Mode column should be deleted from the surveillance tables. These two concerns cause a great deal of confusion which can be easily rectified. Incorporate the principles of WCAP-10271. The instrument tables could be significantly simplified. For example all setpoints for all instruments could be put in one table, operability in a second table and surveillance in a third. This would avoid the repetition which adds significantly to the volume of the present technical specifications. It is recommended that reactor trip and ESF response time requirements be deleted particularly where the times refer to electronic devices. Tests which are performed during startup delay a return to power following reactor trip. It is recommended that these tests be performed periodically (e.g., quarterly) or that another method is developed which allows immediate return to power. It is recommended that an exception be taken to 3.0.4 for all instrumentation functions.
- *9. Equipment Listings - It is recommended that equipment lists be deleted and moved to the FSAR or other appropriate location. These lists add little value to the specifications and result in a significant administrative burden.
10. Surveillance "During Shutdown" - It is recommended that the phrase, "during shutdown" as it applies to surveillances performed on a refueling interval be deleted wherever it appears. This would allow some of the surveillance to be performed on-line when required or appropriate.
11. Ventilation and/or Cleanup Systems - It is recommended that all filter surveillance for Ventilation and/or Cleanup Systems be deleted and allowed to exist as a program. This would allow the removal of a large amount of unnecessary detail from the specifications. Also wherever the specification refer to operation with heaters on, it is recommended that the words, "in automatic" be added to allow normal system operation. Also it seems unnecessarily burdensome to run the ventilation system 10 hours each month. It is recommended that this be revised to once per quarter in keeping with other safety related systems or the run time decreased significantly.
12. Cold Overpressure Vents - All references to RCS vents included in Section 8 of the specifications should be deleted. These requirements merely repeat specification 3/4.4.9.3 actions and hence do not constitute additional requirements. In some cases, inclusion of these statements may prevent the use of other cold overpressure mitigation options.
- from bob howard