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December 27, 1985

Docket Nos. 50-277
50-278
50-352

Mr. Harold R. Denton, Director
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Technical Specification Improvements

- REFERENCES:
- (1) "Technical Specification Improvements", AIF Subcommittee on Technical Specification Improvements, October 8, 1985
 - (2) NRC Technical Specification Improvement Project Final Report, "Recommendations for Improving Technical Specifications", September 30, 1985
 - (3) Technical Specification Improvement Analyses for BWR Reactor Protection System, NEDC-30851P, May 1985
 - (4) BWR Owners' Group Technical Specification Improvement Methodology (with demonstration for BWR ECCS actuation instrumentation), Part 1, NEDC-30936P, November 1985

Dear Mr. Denton:

Philadelphia Electric Company strongly endorses the recent NRC and industry sponsored initiatives to re-establish the original purpose and scope of technical specifications. We believe these reforms are long overdue and would provide major improvements to plant operations and the regulatory process. It is requested that the NRC proceed immediately to implement the recommendations for technical specification reform as presented in the AIF report (Reference 1) and the Technical Specification Improvement Project (NRC-TSIP) report (Reference 2).

ADD: BWR - L/BC's TECH SUPPORT

EB (LIAW)
PSB (L.HULMAN)
EICSB (SRINIVASAN)
RSB (ACTING)
FOB (VASSALLO)
AD - G. LAINAS (Ltr only)

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On October 1, 1985, the NRC-TSIP presented its recommendations to NRC management concerning improvements to technical specifications which would enhance safety while retaining sufficient control over plant operations to ensure protection of public health and safety. The NRC-TSIP's final report (Reference 2) notes that a root cause of current problems is the lack of explicit criteria to delineate the scope and purpose of technical specifications. The NRC-TSIP recommends that the NRC endorse the technical specification screening criteria developed by the industry (Reference 1).

Philadelphia Electric Company was an active participant in the development of the AIF sponsored technical specification report (Reference 1) and fully endorses its recommendations. The screening criteria would limit the technical specifications to the essential operating requirements needed to maintain the validity of the FSAR. The enormous volume of the technical specifications lessens the likelihood that operators will focus attention on matters of more immediate importance to safe operation of the facility. The current volume and complexity of the document invites misinterpretation and increases the number of reports identifying items of non-compliance. Material deleted from the technical specifications can be effectively controlled using other existing documents, including procedures, FSAR, Fire Protection Plan, and Quality Assurance Plan. Streamlining the technical specifications would also improve the utilization of manpower resources by reducing the unnecessary paperwork burden associated with the processing of license amendments.

In addition to a screening criteria, several near-term improvements to existing technical specifications are identified in the AIF report which could be implemented independent of rulemaking activities. These improvements should be expedited through the issuance of Generic Letters. It is recommended that the following near-term improvements be given serious consideration.

1. Design details, such as component lists of smoke detectors, isolation valves, fire hydrants, hose stations, and overcurrent protective devices, should be described and controlled by the FSAR rather than the Technical Specifications.
2. Many of the provisions in the Administrative Control Section of the Technical Specifications should be deleted and controlled by the FSAR or administrative procedures. These provisions include staffing (organization charts), training, control of modifications, and safety committee responsibilities.

This would avoid the requirement to process a license amendment every time there is a position title change or improvement in the organization staffing.

3. The 18-month surveillance interval for some equipment should be increased to permit testing in parallel with refueling outages. Longer than anticipated fuel cycles have resulted in surveillance required outages several weeks or months prior to the start of a scheduled refueling outage. The benefits associated with these surveillance required outages do not appear to justify the additional transients, accelerated equipment wearout, and personnel work stress associated with plant outages.

In general, the recommendations of the NRC-TSIP are consistent with those of the AIF report. One key exception, however, is the NRC-TSIP position that the screening criteria should be endorsed via an NRC Policy Statement. While this is an important first step, it is our recommendation that the screening criteria be made a part of the Commission's regulation to ensure regulatory stability. With incorporation of the screening criteria in the Commission's regulations, licensees will have assurance that technical specification improvements will be preserved.

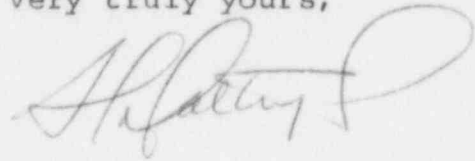
Another effort of the industry to reform the Technical Specifications has been the development of a risk-based methodology to identify improvements to the test intervals and allowable out-of-service times in the Technical Specifications. Philadelphia Electric Company actively participated in the BWR Owners' Group task to develop and submit to the NRC (References 3 and 4) an analyses applicable to the Reactor Protection System and Emergency Core Cooling System instrumentation. The analyses provide a basis for changes that increase safety and improve plant operations. The analyses support increased test intervals for some components, which reduces the potential for: (a) unnecessary plant scrams (reduces challenges to plant shutdown systems and improves plant availability); (b) excessive test cycles on equipment (reduces wearout potential); and (c) the diversion of plant personnel and resources on unnecessary testing. We plan to submit a license amendment application proposing revisions to the instrumentation surveillance frequency and allowable out-of-service times, following NRC approval of the submitted methodologies.

Philadelphia Electric Company recognizes the need for technical specification reform and strongly supports the

implementation of the NRC-TSIP and industry recommendations. Realizing that a program to develop new BWR standard technical specifications will require significant resources, we believe that commitment of industry resources is contingent upon receipt of NRC acceptance and approval of the TSIP, AIF, and BWR Owners' Group recommendations.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Alfred P. Johnson", written in a cursive style.

cc: Dr. T. E. Murley, Administrator, Region I, USNRC
T. P. Johnson, PB Resident Site Inspector
E. M. Kelly, LGS Senior Resident Site Inspector