

May 8, 1997

Mr. James Davis
Nuclear Energy Institute
1776 Eye Street, NW
Suite 300
Washington, DC 20006-2496

Dear Mr. Davis:

At the meeting with the Technical Specifications Task Force (TSTF) on October 28-29, 1996, the NRC was provided the attached LCO 3.0.7 Comparison to support proposed changes to the Standard Technical Specifications (STS), designated TSTF-41 and TSTF-48. That summary characterizes the test and special operations provisions of the STS as "the same ... except for small, editorial differences." However, it has been our experience that considerable effort can be expended to later reconcile whether such language differences were intended to describe differences in practice. Despite the assertion that the intended practice is the same, TSTF-41 would change NUREG-1431 to be a hybrid between the PWR *Test Exception* and the BWR *Special Operations* terminology. Conversely, TSTF-48 would change NUREG-1432 from *Special Test Exception* to *Test Exception*.

We would be inclined to reject TSTF-41 and accept TSTF-48 in the interests of achieving some standardization and consistency, except that the proposed changes in TSTF-48 are incomplete because NUREG-1432 uses the "STE" designation throughout the associated "exception" LCOs. We continue to believe that the TSTF should be able to reconcile a standard explanation for the exception LCOs which would reasonably describe the reasoning associated with "special operations" and "testing," and conclude on whether *entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications*.

Accordingly, in order to avoid promulgating additional variations of LCO 3.0.7 as the STS conversions continue, we conclude that we must reject the changes proposed in TSTF-41 and TSTF-48. However, we encourage the TSTF to reflect on their agreement of the concept and develop a consistent description of the exception LCOs that will remove as much ambiguity as possible and permit consistent conforming changes to be made to all of the STS at one time.

Sincerely,

Original Signed by:
C. I. Grimes

Christopher I. Grimes, Chief
Technical Specifications Branch
Office of Nuclear Reactor Regulation

Enclosure:
As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Nuclear Energy Institute
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Accordingly, in order to avoid promulgating additional variations of LCO 3.0.7 as the STS conversions continue, we conclude that we must reject the changes proposed in TSTF-41 and TSTF-48. However, we encourage the TSTF to reflect on their agreement of the concept and develop a consistent description of the exception LCOs that will remove as much ambiguity as possible and permit consistent conforming changes to be made to all of the STS at one time.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. I. Grimes", is positioned above the typed name.

Christopher I. Grimes, Chief
Technical Specifications Branch
Office of Nuclear Reactor Regulation

Enclosure:
As stated

LCO 3.0.7 Comparison

LCO 3.0.7 is the same between the 5 NUREGs except for small, editorial, differences.

- The most obvious difference is the name of the exceptions. The exceptions are called Test Exceptions by BWOG (Special Exceptions after approval of TSTF-41), Test Exceptions by WOG, Special Test Exceptions by CEOG, and Special Operations by BWROG (BWR/4 and BWR/6).
- The next difference is a small change in wording between the WOG and BWOG NUREGs and the CEOG, BWR/4 and BWR/6 NUREGs with the last sentence of the former stating, "... entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications," and the latter stating, "... entry into a MODE or other specified condition in the Applicability shall *only* be made in accordance with the other applicable Specifications," (emphasis added). However, the word "only" does not change the application of the sentence.
- The last remaining difference is the designation of the affected specifications. CEOG uses the bracketed phrase "in each applicable LCO section" in the CEOG NUREG, while bracketed LCO numbers are used in the BWOG and CEOG NUREGs. The BWR/4 NUREGs state, "in Section 3.10."

Each LCO 3.0.7 entry is given below with differences highlighted with italics.

BWOG

LCO 3.0.7

Test Exception LCOs [3.1.9, 3.1.10, 3.1.11 and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with *Test Exception* LCOs is optional. When a *Test Exception* LCO is desired to be met but is not met, the ACTIONS of the *Test Exception* LCO shall be met. When a *Test Exception* LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

WOG

LCO 3.0.7

Test Exception LCOs [3.1.9, 3.1.10, 3.1.11, and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with *Test Exception* LCOs is optional. When a *Test Exception* LCO is desired to be met but is not met, the ACTIONS of the *Test Exception* LCO shall be met. When a *Test Exception* LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

CEOG

LCO 3.0.7

Special test exception (STE) LCOs [in each applicable LCO section] allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

BWR/4

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

BWR/6

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.