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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

September 20, 1982

TO ALL PRESSURIZED POWER REACTOR LICENSEES

Gentlemen:

SUBJECT: NUREG-0737 TECHNICAL SPECIFICATIONS (GENERIC LETTER NO. 82-16)

NUREG-0737 "Clarification of TMI Action Plan Requirements" identifies those items for which Technical Specifications are required. Technical Specifications are required to provide necessary assurance that facility operation is maintained within the limits determined acceptable following implementation at each facility. The scope and type of specification should include appropriate actions if a limiting condition for operation cannot be met, and for installed equipment, relevant surveillance requirements.

A number of NUREG-0737 items which require Technical Specifications were scheduled for implementation by December 31, 1981. Each of those items is discussed in Enclosure 1. Included in the discussion is guidance on the scope of a specification which the staff would find acceptable. Enclosure 2 are samples in Standard Technical Specification format with blanks or parentheses appearing where the information is plant specific. It includes appropriate pages as background information for facilities that do not have Standard Technical Specifications. These samples are for your information only.

We solicited comments on proposed Technical Specifications from all pressurized water reactor owners groups and Atomic Industrial Forum. Appropriate comments have been incorporated. We request that you review your facility's Technical Specifications to determine if they are consistent with the guidance provided in Enclosure 1. For those items where you identify deviations or absence of a specification, we request that you submit an application for a license amendment. If some of the items are not yet implemented at your facility, you should submit an amendment request at the time they are implemented. Please respond within 90 days of receipt of this letter.

This request for information was approved by the Office of Management and Budget under clearance number 3150-0065 which expires May 31, 1983. Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management Room 3208, New Executive Office Building, Washington, D.C. 20503.

Sincerely,

Darrell G. Eisenhut, Director

Division of Licensing  
Office of Nuclear Reactor Regulation

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Multiple Addressees - 2 -

Enclosures:

1. Technical Specification  
Guidance
2. Sample Technical Specification

ENCLOSURE 1

STAFF GUIDANCE OF NUREG-0737 TECHNICAL SPECIFICATIONS  
(ITEMS SCHEDULED BY DECEMBER 31, 1981)

(1) A Training (I.A.1.1.3)

Our July 2, 1980 letter provided model TSs for TMI lessons learned Category "A" items. Included were TSs that specified the qualifications, training and on-duty requirements for the Shift Technical Advisors (STA). STA training requirements are under the consideration by the Commission. Further guidance will be provided pending the decision on the requirements by the Commission.

(2) Limit Overtime (I.A.1.3)

On June 15, 1982 we transmitted to licensees of operating plants a revised version of the Commission's Policy Statement on nuclear power plant staff working hours. In the same letter we also transmitted revised pages of NUREG-0737 (Item I.A.1.3). The administrative section of the technical specifications should be revised to require procedures that follow the policy statement guidelines. An acceptable specification would be the amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12)," or following the model TSs in Enclosure 2.

(3) Short Term Auxiliary Feedwater System Evaluation (II.E.1.1)

The objective of this item is to improve the reliability and performance of the auxiliary feedwater (AFW) system. TSs depend on the results of the licensee's evaluation and the staff review, and are being developed separately for each plant. The limiting conditions of operation (LCO's) and surveillance requirements for the AFW system should be similar to other safety-related systems.

(4) Safety grade AFW System Initiation and Flow Indication (II.E.1.2)

The AFW system automatic initiation system was to have been control grade by June 1, 1980 and safety grade by July 1, 1981; the AFW system flow indication was to have been control grade by January 1, 1980 and safety grade by July 1, 1981. The control grade requirement was part of the short term lessons learned activities, and model TSs were included with our July 2, 1980 letter. These TSs are considered adequate as TSs for the safety grade requirement.

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(5) Dedicated Hydrogen Penetrations (II.E.4.1)

Plants that use external recombiners or purge systems for post-accident combustible gas control of the Containment atmosphere should provide containment penetrations dedicated to that service. In satisfying this item, some plants may have to add some additional piping and valves. If so, these valves should be subjected to the requirements of Appendix J, and the TSs should be modified accordingly.

(6) Containment Pressure Setpoint (II.E.4.2.5)

The containment pressure setpoint that initiates containment isolation must be reduced to the minimum compatible with normal operating conditions. Most plants provided justification for not changing their setpoint and we approved their justification by separate correspondence. The remaining plants must submit a change to the TSs with the lower containment pressure setpoint and provide justification if this setpoint is more than 1 psi above maximum expected containment pressure during normal operation.

(7) Containment Purge Valve (II.E.4.2.6)

Model TSs are being sent separately to each plant as part of the overall containment purge review. These TSs include the requirement that the containment purge valves be locked closed except for safety-related activities, verified closed at least every 31 days, and be subjected to leakage rate limits.

(8) Radiation Signal on Purge Valves (II.E.4.2.7)

The containment purge valves must close promptly to reduce the amount of radiation released outside containment following a release of radioactive materials to containment. TSs should include the requirement that at least one radiation monitor that automatically closes the purge valves upon sensing high radiation in the containment atmosphere be operable at all times except cold shutdowns and refueling outages. If not operable, either the plant should be proceeding to cold shutdown within 24 hours or the purge valves should be closed within 24 hours. Model TSs are provided in Enclosure 2 in Standard Technical Specifications format for those plants that are using safety-grade components to satisfy the requirement.

(9) Upgrade B&W AFW System (II.K.2.8)

Acceptance criteria for proposed TSs are identical to that described in (2) and (3) above.

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(11) B&W Thermal-Mechanical Report (II.K.2.13)

Licensees of B&W operating reactors are required to submit by January 1, 1981 an analysis of the thermal-mechanic conditions in the reactor vessel during recovery from small breaks with an extended loss of all feedwater. TSs, if required, will be determined following staff review.

(12) Reporting SV and RV Failures and Challenges (II.K.3.3)

NUREG-0660 stated that safety and relief valve failures be reported promptly and challenges be reported annually. The sections of your TSs that discuss reporting requirements should be accordingly changed; model TSs are given in Enclosure 2. Note that an acceptable alternative would be to report challenges monthly.

(13) Anticipatory Trip on Turbine Trip (II.K.3.12)

Licensees with Westinghouse-designed operating plants have confirmed that their plants have an anticipatory reactor trip upon turbine trip. Many of these plants already have this trip in their TSs. For those that do not, the anticipatory trip should be added to the TSs. Model TSs are included in Enclosure 2 in the format of Standard Technical Specifications.