

From: C. Craig Harbuck
To: Internet:Harold.D.PontiousJr@ucm.com
Date: Wed, Feb 16, 2000 11:14 AM
Subject: Proposed Draft UHS Action Requirements (TSTF 330)

Harry,

Attached is the file containing the proposed draft UHS Action Requirements which we discussed in our telephone conversation yesterday. If you and the other OGs TSTF representatives want to discuss this in a conference call before the next TSTF - NRC meeting on March 7 and 8, 2000, let me know and we'll set it up. In any event, we'll discuss it at the meeting. This email and attachment will be put into ADAMS today, FYI.

Craig

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Proposed New Actions for UHS TS
Establish Periodic Remedial Actions to Permit Continued Operation Indefinitely

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. [Water level of UHS below limit.	B.1 Verify required cooling capacity maintained. <u>AND</u> B.2 Verify UHS level \geq [] ft.	[1] hour <u>AND</u> Once per [8] hours thereafter Once per [8] hours]
C. [Temperature of UHS above limit.	C.1 Verify required cooling capacity maintained. <u>AND</u> C.2 Verify UHS temperature \leq [] °F.	[1] hour <u>AND</u> Once per [8] hours thereafter Once per [8] hours]

Issue 1 Restrictions on the Evaluation to Verify Required Cooling Capacity is Maintained

Details of what constitutes maintaining the required cooling capacity should be described in the Bases for the Actions; for example, it should utilize the analysis of record. More specifically, we need to somehow capture the criteria that when the primary temperature and level requirements are not met, the evaluation justifying continued operation must be consistent with the analysis of record. The only difference being that during the period when the primary level and temperature requirements are not met, the licensee can credit the actual conditions that exist (e.g., number of heat exchanger tubes plugged and tube fouling conditions if known, bulk UHS level and temperature, air temperature and humidity, wind conditions, containment temperature, etc.), but no changes in analytical methodology or in other assumptions would be allowed. The worst-case single failure would also have to be assumed.

Issue 2 Basis for Secondary Level and Temperature Limits

The secondary level and temperature limits in Required Actions B.2 and C.2, respectively, would be based on plant-specific limitations and would have to be justified in the amendment application. Specifically, these secondary UHS level and temperature limits should be established based on the limitations imposed by plant equipment.

Issue 3 Basis for Periodic Completion Times

The periodic Completion Times should reflect reasonable rates of level and temperature changes based on plant experience.

Issue 4 Option: Relief from Assuming a Single Failure

If the evaluation justifying continued operation allows an exception to the single failure criteria, then there should be a limitation on the amount of time that could be allowed in this condition. In other words, an Action would have to be constructed to allow operation for only a limited time period.