# **PUBLIC SUBMISSION**

As of: February 23, 2012 Received: February 22, 2012 Status: Pending Post Tracking No. 80fbda34 Comments Due: February 29, 2012 Submission Type: Web

## **Docket:** NRC-2012-0019

Notice of Opportunity for Public Comment on the Proposed Model for Plant-Specific Adoption of TSTF-432, Revision 1

## Comment On: NRC-2012-0019-0001

Notice of Opportunity for Public Comment on the Proposed Models for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)" Using the Consolidated Line Item Improvement Process 1/30/2012) 17 FR 4586

Document: NRC-2012-0019-DRAFT-0004 Comment on FR Doc # 2012-01912

1 3 **Submitter Information** 3 U.J Name: Brian Mann Address: ထ္ 11921 Rockville Pike Suite 100 Rockville, MD, 20852 Submitter's Representative: Brian Mann **Organization:** Technical Specifications Task Force

## **General Comment**

Attached are comments prepared by the Technical Specification Task Force (TSTF) on the Federal Register Notice, "Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-432, Revision 1, 'Change In Technical Specifications End States (WCAP-16294)' Using the Consolidated Line Item Improvement Process," which was published in the Federal Register on January 30, 2012 (77FR4586). NRC Docket ID NRC-2012-0019.

## Attachments

NRC Docket ID NRC-2012-0019 TSTF comments

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E-RIDS = ADH-03 are = M. Honcharik (meh3)

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Below are comments prepared by the Technical Specification Task Force (TSTF) on the Federal Register Notice, "Proposed Model Safety Evaluation for Plant-Specific Adoption of Technical Specifications Task Force Traveler TSTF-432, Revision 1, 'Change In Technical Specifications End States (WCAP-16294)' Using the Consolidated Line Item Improvement Process," which was published in the Federal Register on January 30, 2012 (77FR4586). NRC Docket ID NRC-2012-0019.

#### Corrections

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- Section 1.1, "Proposed Action," Add "3.5.3-A," "ECCS Shutdown" and "3.5.3-B," "ECCS - Shutdown" to the table of proposed changes to include all of the proposed changes in TSTF-432.
- 2. Section 2.0, "Regulatory Evaluation," paragraph beginning "Appendix A...". Append the following to address plants that are not committed to the 10 CFR 50, Appendix A GDCs:

"[Pre-GDC (PGDC) facilities not licensed under the GDC in Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," are licensed under similar plant-specific design criteria, as described in the facility's licensing-basis documents (such as updated final safety analysis reports).]"

 Section 3.0, "Technical Evaluation," first paragraph. Revise the sentence "Specifically, end states are prescribed in the TS when Required Actions are not met or cannot be met" to delete the phrase "or cannot be met." The default conditions modified by the Traveler state, "Required Actions and associated Completion Times not met." The phrase "or cannot be met" is inconsistent with the TS.

## **Editorial Improvements**

- Section 1.0, "Introductions," Mode descriptions For completeness, revise the Mode descriptions to be consistent with Table 1.1-1 of NUREG-1431. Add "The reactor is critical and" before "Thermal Power" for Modes 1 and 2. Add "The reactor is subcritical and" before "The average" for Modes 3, 4,5.
- 5. Section 3.1.1, "Proposed Required Actions" To be clear, add to the Table: "3.5.3 ECCS Shutdown", "C.1", "Mode 5 in 24 hours", and "See Note". Preface the paragraph following the table with "Note:"
- 6. Section 7.0, "References," Reference 2 Add "Revision 1, " following "WCAP-16294-NP-A," consistent with the second paragraph of the SE.