

SUPPLEMENTARY INFORMATION:**Background**

Regulatory Issue Summary 2000–06, “Consolidated Line Item Improvement Process for Adopting Standard Technical Specification Changes for Power Reactors,” was issued on March 20, 2000. The CLIIP is intended to improve the efficiency of NRC licensing processes. This is accomplished by processing proposed changes to the standard technical specifications (STS) in a manner that supports subsequent license amendment applications. The CLIIP includes an opportunity for the public to comment on proposed changes to the STS following a preliminary assessment by the NRC staff and finding that the change will likely be offered for adoption by licensees. The NRC staff evaluates any comments received for a proposed change to the STS and either reconsiders the change or proceeds with announcing the availability of the change for proposed adoption by licensees. Those licensees opting to apply for the subject change to TS are responsible for reviewing the staff’s evaluation, referencing the applicable technical justifications, and providing any necessary plant-specific information. Each amendment application made in response to the notice of availability will be processed and noticed in accordance with applicable rules and NRC procedures.

This notice involves the elimination of requirements for hydrogen recombiners, and hydrogen and oxygen monitors in TS for LWRs. This proposed change was proposed for incorporation into the STS and is designated TSTF–447, Revision 1. TSTF–447, Revision 1 is supported by the implementation of a revision to 10 CFR 50.44, “Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors.” The amended standards eliminated the need for requirements for hydrogen recombiners and for hydrogen and oxygen monitors in TS. TSTF–447, Revision 1 can be viewed on the NRC Web site (www.nrc.gov).

Applicability

This proposed change to remove requirements for hydrogen recombiners, and hydrogen and oxygen monitors from TS is applicable to LWRs (i.e., all operating plants).

To efficiently process the incoming license amendment applications, the staff requests each licensee applying for the changes addressed by TSTF–447, Revision 1 using the CLIIP to address the following plant-specific verifications and regulatory commitments. The CLIIP does not prevent licensees from

requesting an alternative approach or proposing the changes without the requested verifications and regulatory commitments. Variations from the approach recommended in this notice may, however, require additional review by the NRC staff and may increase the time and resources needed for the review. In making the requested regulatory commitments, each licensee should state: (1) That the subject capability exists (or will be developed) and will be maintained; (2) where the capability or procedure will be described (e.g., severe accident management guidelines, emergency operating procedures, emergency plan implementing procedures); and (3) a schedule for implementation. The amendment request need not provide details about designs or procedures.

Each licensee should verify that it has, and make a regulatory commitment to maintain (or make a regulatory commitment to develop and maintain):

- a. A hydrogen monitoring system capable of diagnosing beyond design-basis accidents; and
- b. An oxygen monitoring system capable of verifying the status of the inert containment for plant designs with an inerted containment. (for applicable boiling water reactors)

Public Notices

In a notice in the **Federal Register** dated August 2, 2002 (67 FR 50374), the staff requested comment on the use of the CLIIP to process requests to delete hydrogen recombiner, and hydrogen and oxygen monitor requirements from TS.

TSTF–447, Revision 1, and documents associated with the revision of 10 CFR 50.44 may be examined, and/or copied for a fee, at the NRC’s Public Document Room, located at One White Flint North, Public File Area O1 F1, 11555 Rockville Pike (first floor), Rockville, Maryland. Publicly available records are accessible electronically from the ADAMS Public Library (the Electronic Reading Room) component on the NRC Web site (www.nrc.gov).

The staff received one comment (from an individual licensee) following the notice soliciting comments about modifying the TS requirements regarding hydrogen recombiners, and hydrogen and oxygen monitors for LWRs. The comment on the model SE was offered, and is summarized and discussed below:

1. *Comment:* A licensee recommended that the SE also include conclusions as to the acceptability of eliminating containment purging as the design basis method for post-loss-of-coolant accident (LOCA) hydrogen

control. Some licensees use containment purging as the design basis method for compliance with the current 10 CFR 50.44, rather than hydrogen recombiners. Although the containment purge requirements were not incorporated into the TS, as was done for hydrogen recombiners, the requirement for purging exists in docketed commitments to the NRC and in the Final Safety Analysis Report (FSAR). The process of changing the FSAR and the docketed commitments would be simplified if the NRC SE included consideration of containment purging.

Response: The NRC model SE only addresses requirements in the STS or plant-specific TS. In this case, the NRC model SE is for the elimination of the requirements of hydrogen recombiners, and hydrogen and oxygen monitors from TS. Since containment purging requirements are not in the STS, the NRC model SE did not make conclusions about the acceptability of eliminating containment purging as the design basis method for post-LOCA hydrogen control. However, the following statement from the Statements of Considerations was added to the model SE to address the comment:

* * * the Commission eliminated the hydrogen release associated with a design-basis LOCA from § 50.44 and the associated requirements that necessitated the need for the hydrogen recombiners and the backup hydrogen vent and purge systems.

In addition, the staff has made some minor changes to the model SE as a result of internal reviews. A specific change involves the reference to Criterion 2 (10 CFR 50.36(c)(2)(ii)(B)) as the basis for retention of primary containment oxygen concentration in the TS. In the model SE, the staff had proposed to change the basis to Criterion 4 (10 CFR 50.36(c)(2)(ii)(D)) since combustible gas generated from severe accidents was not risk significant for Mark I and II containments, provided that the required inerted atmosphere was maintained. Criterion 4 is intended to capture those constraints that probabilistic risk assessment or operating experience show to be significant to public health and safety, consistent with the Commission’s Probabilistic Risk Assessment (PRA) Policies. Upon further review by the staff, it was determined that the basis for the primary containment oxygen concentration should remain Criterion 2 since the typical Updated FSAR Chapter 6 analyses assume that the primary containment is inerted when a design basis LOCA occurs. Therefore, primary containment oxygen concentration is a