



UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
Washington, D.C. 20555

INSPECTION AND ENFORCEMENT MANUAL

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INSPECTION PROCEDURE 71301

TECHNICAL SPECIFICATION REVIEW

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PROGRAM APPLICABILITY: 2513

71301-01 INSPECTION OBJECTIVE

The objective of this procedure is to ascertain whether proposed technical specifications are clear and enforceable and reflect the installed referenced systems.

71301-02 INSPECTION REQUIREMENTS

02.01 Technical Specification Review

- a. Review the proof-and-review version of the specific facility technical specifications (PRTS) for clarity and enforceability. The review is to include: accuracy of set points based on FSAR values; capability to perform surveillances as stated in the technical specification; and the policies in Section 6 of the Technical Specifications. Where possible the technical specifications are to be compared with the technical specifications for a sister plant or same-generation type plant to quickly identify discrepancies and pinpoint suspect systems.
- b. The technical specifications should be further examined by walk-down inspection to verify that covered systems installed in the plant conform to the technical specifications. (Reference Inspection Procedure 37301 03.01, b.1.)
- c. Transmit comments on proof-and-review technical specifications to the appropriate Regional Division Director for action and to the appropriate IE Division Director for information. These comments are to arrive 10 working days before the due date established by the NRR transmittal letter.

02.02 Technical Specification Review Meetings

- a. Attend announced NRR/licensee meetings following submittal of comments to NRR to ensure acceptability of negotiated changes to the proof-and-review version (attendance at Region's option).

- b. An NRR/Regional meeting prior to the announced NRR/Licensee meeting should be held. Review with the appropriate Regional and IE staffs the results of this meeting.

71301-03 INSPECTION GUIDANCE

03.01 Technical Specification Review

- a. Approximately six months before issuance of the operating license (OL), potential licensees are requested by NRR to provide a marked-up copy of the standard technical specifications (STS) applicable to their specific facility. Following review of the marked-up version of the STS, NRR issues for staff comment, a proof-and-review copy of the proposed technical specifications. A copy is routinely sent to the appropriate Regional office approximately 90 days before the OL is scheduled to be issued. It is this version that is to be reviewed by the Regional inspectors for this inspection procedure.

When comparing technical specifications with those of a "sister" plant, the reviewer should use caution since there may be seemingly minor differences in design which could require significant changes in technical specifications.

- b. The scope of the Regional review of the proof-and-review technical specifications (PRTS) should be limited to comparisons with the as-built plant and to clarifications of the limiting conditions for operation, surveillance requirements, design features, and administrative controls, including applicable action statements. In all cases, hypothetical violations should be considered for enforceability. Areas having the potential for misinterpretation by the inspector or licensee should be included in the comments. Normally it can be assumed that NRR has performed the necessary review for technical accuracy and sufficiency; however, the inspector may also develop comments in this regard. The inspector should be particularly alert to identify and ensure completeness of technical specifications for plant specific items. In addition it is desirable that NRR be present for the Regional inspections.
- c. The distribution transmittal for the PRTS will identify a comment-submission due date. Comments developed by the Region should be furnished to the appropriate RES staff management at least 10 working days before the identified due date to permit Regional review for consistency with previously submitted comments and established NRC policies. The Region will transmit final comments to NRR to satisfy Regional comment responsibility.

- d. Information gained from the technical specification comparison effort provides the basis for selection of systems to be inspected further. That is, should the inspector observe discrepancies within a technical specification indicating poor preparation or technical error, that system should be checked against the FSAR, PRTS, and available "as-built" drawings with a walk-down inspection.

03.02 Technical Specification Review Meetings

- a. Following submittal of comments on the PRTS, NRR may schedule meetings with the licensee to discuss remaining differences between the licensee's proposed technical specifications and the NRR PRTS. The inspector should attend these meetings, as approved by his Regional supervision, consistent with his other programmatic responsibilities. During these meetings, he should be alert for negotiated changes that could adversely affect the clarity or enforceability of the PRTS. The inspector also may be asked to provide an enforcement interpretation. Normally if an interpretation is required, the wording should be changed to obviate the need for interpretation.
- b. Following this meeting, a telephone or personal discussion between the inspector and the cognizant engineer for technical specifications in the Region should be initiated by the inspector to identify points of contention and potential areas requiring change in the STS.
- c. If NRR schedules meetings with the licensee prior to the PRTS comment period, the inspector should ascertain from the licensee or licensing project manager the scope of the meeting and Regional supervision should establish the need for inspector attendance. If the inspector attends such meetings, the summary briefing of the appropriate Regional staff should follow these meetings.

END

