

June 6, 2000

Mr. Biff Bradley
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Suite 400
1776 I Street, NW
Washington, DC 20006-3708

SUBJECT: APRIL 13, 2000: SUMMARY OF MEETING WITH RISK-INFORMED
TECHNICAL SPECIFICATION TASK FORCE

Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the Risk-Informed Technical Specification Task Force. The meeting was held at the U.S. Nuclear Regulatory Commission (NRC) Headquarters offices in Rockville, Maryland, on April 13, 2000.

Sincerely,

/RA/

William D. Beckner, Chief
Technical Specifications Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Enclosures: 1. Meeting Summary
2. Attendance List
3. Meeting Presentations

cc: See attached list

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DISTRIBUTION: See attached.

ACCESSION NUMBER: ML003720309

OFFICE	NRR/DRIP/RTSB	NRR/DRIP/RTSB	NRR/DRIP/RTSB
NAME	NVGilles NVG	RLDennig RLD	WDBeckner WDB
DATE	06/06/00	06/06/00	06/06/00

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Multiple Addressees

June 6, 2000

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NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE

Meeting Summary
April 13, 2000

A meeting between the NRC staff and industry representatives comprising the Risk-Informed Technical Specification Task Force (RITSTF) was held on April 13, 2000. The attendees are listed in Enclosure 2. Copies of the meeting presentations are contained in Enclosure 3. The meeting was a continuation of earlier meetings where the NRC staff and the industry discussed ongoing risk-informed technical specification initiatives and the creation of a fully risk-informed set of standard technical specifications (STS).

The group discussed the agenda for the upcoming meeting with the Joint ACRS Subcommittees on Plant Operations and Reliability and Probabilistic Risk Assessment (PRA). The purpose of the meeting was to discuss Initiative 2 on missed surveillance requirements and Initiative 3 on mode restraint flexibility. The group discussed the need to address the concerns of the Reliability and PRA Subcommittee identified at the previous Subcommittee meeting.

A representative from ABB-Combustion Engineering representing the Combustion Engineering Owners Group (CEOG) presented some conceptual thoughts on RITSTF Initiative 4 regarding replacing fixed technical specification (TS) allowed outage times (AOTs) with a configuration risk management program (CRMP) (see Enclosure 3). The premise of the CEOG approach was to conserve the design basis without forcing the licensee to take unsafe action. The group agreed that "completeness" of the PRA tool used to support the TS would be a major issue for Initiative 4 and that the inclusion of a "backstop" AOT to preserve the design basis remained an open issue for Initiative 4. The group discussed the fact that the ease of licensing such a TS would be also an issue in the development of Initiative 4.

A representative from the Boiling Water Reactor Owners Group stated that their concept of Initiative 4 involved a TS that would preserve the original AOT and allow use of a CRMP to go beyond the original AOT. A representative from the South Texas Project (STP) stated that they were developing a phased approach to Initiative 4 and that they were working with the Electric Power Research Institute (EPRI) on this effort. EPRI expects to complete a report on the STP project about September 2000. A representative from the Babcock and Wilcox Owners Group stated that they currently had no funding for Initiative 4, and, although they were interested in this initiative, they thought that it was important to see some of the earlier initiatives approved first. The discussions highlighted that there are many different concepts within the industry with respect to Initiative 4.

The group discussed the recent announcement by the Nuclear Energy Institute (NEI) to pursue a joint rulemaking effort involving the TS rule, 10 CFR 50.36, and the maintenance rule, 10 CFR 50.65, and the fact that this was a top NEI priority. NEI is interested in eliminating the duplicate nature of some of the requirements in these two rules by making them more congruent. This initiative is in the developmental stage and NEI stated that they planned to provide an industry position on this issue in their comments on the Advance Notice of Proposed Rulemaking on Risk-Informing Special Treatment Requirements (65 FR 11488, 3/3/00). The NEI representative pointed out that this effort would only involve the scope of TS and would not involve issues related to Initiative 4. Some of the utility representatives suggested that, if the

industry decided that a revision to the TS rule should be proposed, then all of the TS issues should be addressed at one time so that only one rulemaking effort is necessary.

The group discussed the status of several of the RITSTF initiatives. Industry representatives stated that a CEOG report on Initiative 1 involving safe end states would be submitted to the NRC for review in the very near future. The industry group stated that the Technical Specifications Task Force (TSTF) was reviewing the CEOG report and that the other Owners Groups would decide shortly on a consistent approach to this initiative. The group stated that it is likely that the first revision of the TSTF change package for this initiative will only apply to the CEOG and that the other Owners Groups would be included in Revision 1 of the TSTF package, after the major technical issues were worked out with the staff.

The group discussed Initiative 6 related to changes to TS related to Limiting Condition for Operation (LCO) 3.0.3 which provides requirements when a licensee finds itself in a condition not covered by its TS. The CEOG stated that they expect to have a report on this initiative completed around June 30, 2000. The initiative involves identifying conditions not currently defined in TS and providing actions for those conditions and for providing shutdown requirements in individual LCOs rather than directing licensees to LCO 3.0.3 for shutdown requirements.

With regard to Initiative 4 (discussed earlier), the industry group stated that they hoped to have a defined process and schedule by July 2000. The CEOG stated that they may have a pilot proposal developed by the end of 2000.

With regard to Initiative 5 related to surveillance requirements (SRs), the industry stated that item (a) covering the relocation of SRs not related to the safety function governed by the LCO should be submitted about September 2000. Item (b) related to relocating surveillance test intervals to licensee control would likely be submitted in 2001 to let some of the other initiatives move ahead first. The group acknowledged that this initiative involved some legal issues related to the words in the TS rule regarding SRs.

With regard to Initiative 7 related to defining requirements for equipment that is not operable but is still functional, the industry stated that they expected to develop a TSTF sometime in 2001.

The group discussed Initiatives 2 and 3, the two RITSTF initiatives that are currently under NRC review. The industry stated that the success of these initiatives was critical for everyone and that the industry needed to see progress made on these initiatives. The NRC staff stated that they needed the industry to identify their priorities for TS issues because so many "high priority" TS items under NRC staff review had already been identified by the industry.

With regard to Initiative 2 related to extending the time to perform a missed SR, the industry presented their proposed changes to TSTF-358, the industry proposal to modify STS SR 3.0.3 to address this initiative (see Enclosure 3). The proposed changes were based on additional information the staff had requested following its review of TSTF-358. The major modifications proposed by the industry included a requirement to perform a risk evaluation for all surveillances extended for greater than 24 hours and a commitment that all missed surveillances would be placed in the licensee's corrective action program. The industry also agreed to add more detail to their submittal concerning how they would perform the risk evaluation for a missed SR. The staff stated that they thought that the proposed changes to TSTF-358 would address their concerns.

The group next discussed Initiative 3 related to the allowance to change modes with inoperable equipment based on a risk evaluation. The industry presented their proposed changes to TSTF-359, the industry proposal to modify STS LCO 3.0.4 and SR 3.0.4 to address this initiative (see Enclosure 3). The industry stated that a CEOG analysis would be included in the update to TSTF-359. This analysis looks at single structures, systems, or components out of service and the risk of changing modes in those conditions. The group discussed the fact that only San Onofre Nuclear Generating Station (SONGS) would be capable of performing additional analysis that go beyond those pre-determined CEOG evaluations since SONGS is currently the only CEOG plant with a transition risk model incorporated into their PRA. The staff stated that they needed more information on PRA quality for this initiative and that they may need to identify quality provisions in the generic safety evaluation for this initiative. The industry stated that other Owners Groups would either follow the CEOG process or request that individual licensees provide the information on PRA quality and transition risk evaluation capability.

The industry stated that they would submit Revision 1 of TSTF-358 and TSTF-359 in the near future.

Meeting Attendees

<u>Name</u>	<u>Affiliation</u>
Ray Schneider	ABB-Combustion Engineering Nuclear Fuel Company
Alan Hackerott	Omaha Public Power District
Dennis Henneke	Southern California Edison
Biff Bradley	Nuclear Energy Institute
Tony Pietrangelo	Nuclear Energy Institute
Rick Grantom	South Texas Project
Donald Hoffman	EXCEL Services
Jerry André	Westinghouse
Jim Andrachek	Westinghouse
Jack Stringfellow	Southern Nuclear
Don McCamy	Tennessee Valley Authority
J. E. Rhoads	Energy Northwest
Mike Kitlan	Duke Power
Gene Eckholt	Northern States Power
Rick Hill	General Electric
Malcolm McGawn	Southern California Edison
Frank Rahn	Electric Power Research Institute
Lonnie Daughtery	Entergy Operations, Inc.
Michael Epling	Framatome Technologies
Stanley Levinson	Framatome Technologies
Michael Markley	Advisory Committee on Reactor Safeguards Staff
Mark Reinhart	NRC/NRR/SPSB
Millard Wohl	NRC/NRR/SPSB
Nick Saltos	NRC/NRR/SPSB
William Beckner	NRC/NRR/RTSB
Bob Dennig	NRC/NRR/RTSB
Tilda Liu	NRC.NRR/RTSB
Joe Williams	NRC/NRR/DLPM
Tom Bergman	NRC/NRR/RGEB
Nanette Gilles	NRC/NRR/RTSB

**ENCLOSURE 3
MEETING PRESENTATIONS**