October 16, 2000

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

SUBJECT: OCTOBER 10, 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 Nuclear Energy Institute (NEI) offices in Washington, DC, on October, 10, 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

cc: See attached list

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DATE	10/16/00	10/16/00	10/16/00

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cc via e-mail:

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Nuclear Energy Institute

Mr. Tony Brooks
Nuclear Energy Institute

Mr. Alan Hackerott, Chairman
Omaha Public Power District

Mr. Jerry André
Westinghouse Electric Company

Mr. James Andrachek
Westinghouse Electric Company

Mr. Jack Stringfellow
Southern Nuclear Operating Company

Mr. Donald McCamy
Browns Ferry Nuclear Plant

Mr. Ray Schneider
Westinghouse Electric Company

Mr. James Riccio
Public Citizen

Mr. Gary Chung
Southern California Edison

Mr. Brian Woods
Southern California Edison

Mr. Rick Hill
General Electric Nuclear Energy

Mr. Michael S. Kitlan, Jr.
Duke Energy Corporation

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SUMMARY OF OCTOBER 10, 2000 NRC/INDUSTRY MEETING OF THE
NEI RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE

NRC staff met with the NEI Risk-Informed Technical Specification Task Force (RITSTF) on October 10, 2000, from 2 to 4 pm. Two of the NEI project managers for the group, Tony Pietrangelo and Biff Bradley, provided some background on the group's activities and some preliminary plans for industry coordinated activity to further develop risk-informed technical specifications. A formal plan is under development and will likely be available by the end of the year.

The RITSTF has had the benefit of two meetings of the guiding NEI Technical Specification Working Group in July and September of this year. Basic principles guiding the RITSTF include: (1) Build in as much flexibility as possible to allow some benefit for various degrees of PSA sophistication; advanced organizations should be able to benefit commensurate with their capabilities, (2) Develop approaches that are as simple as possible and which can be practically implemented/expressed within the framework of Standard Technical Specifications (STS), and (3) Acknowledge dependence on other risk-informed activities such as PSA quality standard development while not duplicating those efforts.

The RITSTF is pursuing eight initiatives:

I.1 Technical Specification actions end states
I.2 Missed surveillances - SR 3.0.3
I.3 Increase flexibility in mode restraints - Limiting Condition for Operation (LCO) 3.0.4
I.4.a Individual risk-informed allowed outage times (AOTs)
I.4.b Risk-informed AOTs with Configuration Risk Management Program (CRMP) /Maintenance Rule (MR) backstops
I.5.a Relocate surveillance requirements not related to safety to licensee control
I.5.b Relocate surveillance test intervals (STIs) of all surveillance requirements to licensee control
I.6.a Modify LCO 3.0.3 actions and timing - 1 hour AOT to 24 hour AOT
I.6.b Provide Conditions in the LCOs for those levels of degradation where no Condition currently exists
I.6.c Provide specific times for those Conditions that require entry into LCO 3.0.3 immediately
I.7 Define actions to be taken when equipment is not operable but still functional
I.8 Remove/relocate all non-safety systems/non-risk-significant systems out of TS

The staff has been reviewing generic submittals for the first three initiatives. The Combustion Engineering Owner's Group topical report for I.1 (end states) has been reviewed and the staff is currently drafting a safety evaluation. The staff plans to use this safety evaluation in the Consolidated Line Item Improvement Process (CLIIP) to offer adoption of the associated changes to STS, once the industry provides the proposed STS mark-ups for staff review. The RITSTF indicated that follow-on work from other owners groups was in progress, with the BWR work the most advanced. In response to process questions, the staff indicated that the packaging and sequencing was at industry discretion and that no obvious advantages or disadvantages accrued to simultaneous PWR/BWR submittal or to packaging as topical reports.

I.2 (missed surveillances) has been packaged as TSTF-358. Staff and industry have interacted during review since November 1999, and a revised version was submitted in September 2000. The staff owes the industry a schedule for completion of that review.

I.3 (mode restraint flexibility) has been packaged as TSTF-359 and is undergoing revision in response to staff comments. The RITSTF expects to resubmit sometime in December. The general approach was outlined:

(1) Identify the set of "system/equipment" LCOs that an LCO 3.0.4 exception could apply to,

(2) Determine that subset that is highly risk significant and to which a generic exception would not apply; plants could make specific cases for these,

(3) For the remainder, establish within STS the requirement for a maintenance rule type of review by the licensee before taking the exception, and

(4) Take out the existing exceptions now written into STS with the understanding that plants could separately do a one-time analysis to codify in procedures (i.e., take the exception without having to do the maintenance rule type review).

Some individual risk-informed AOTs (I.4.a) should be forthcoming throughout the next year, possibly from the WOG, and there is continuing interest by CEOG in their battery submittal. The more ambitious scope of I.4.b, i.e., risk-informed AOTs with CRMP/MR backstops, will be under development for presentation to the staff late in 2001. The current approach is to treat the current "deterministic" AOT as a "default" and to embed a process to extend the AOT up to a "backstop" value. EPRI's more revolutionary concept is still under development, with a report due shortly. The EPRI concept would probably be pursued with a pilot plant.

I.5.a will be handled in the future as a "deterministic" change to the STS since there is no risk-informed aspect. I.5.b will be taken up in the next year. The RITSTF does not believe that a rule change is needed to relocate STIs outside the technical specifications.

Initiative 6.b and c are being worked with one owners group ready to proceed, another funded, and two others having reviewed the methods. There may be some activity by the end of the year. There are some questions about the cost/benefit that may determine whether all groups eventual invest in the effort. I.6.a is receiving little attention and may have the lowest priority of any of the initiatives.

I.7 addresses concerns about how equipment not literally in STS is nonetheless virtually in STS because it somehow factors into the OPERABILITY determination for equipment that <u>is</u> in technical specifications. The approach is that these kinds of equipment (e.g., barriers) should have administratively controlled outage times based on a risk argument that relies on initiator likelihood. Staff expressed interest in further development but pointed out past practice of always requiring some degree of mitigative capability and not relying on low accident likelihood as the sole basis for acceptance of a condition.

Finally, I.8 was recently added, but it has not yet received much attention at the working level.

Meeting Attendees

Name	Affiliation
Ray Schneider	Westinghouse/CEOG
Alan Hackerott	Omaha Public Power District/CEOG
Brian Woods	Southern California Edison/CEOG
Biff Bradley	Nuclear Energy Institute
Tony Pietrangelo	Nuclear Energy Institute
Tony Brooks	Nuclear Energy Institute
Donald Hoffman	EXCEL Services
Jerry André	Westinghouse/WOG
Jim Andrachek	Westinghouse/WOG
Don McCamy	Tennessee Valley Authority/BWROG
J. E. Rhoads	Energy Northwest/BWROG
Mike Kitlan	Duke Power/BWOG
Frank Rahn	Electric Power Research Institute
Michael Epling	Framatome Technologies/BWOG
Thomas Morgan	Scientech
Millard Wohl	NRC/NRR/SPSB
Nick Saltos	NRC/NRR/SPSB
Bob Dennig	NRC/NRR/RTSB