

January 25, 2001

Mr. Tony Pietrangelo, Director
Risk and Performance Based Regulation
Nuclear Energy Institute
1776 I Street, N. W.
Suite 400
Washington, DC 20006-3708

Dear Mr. Pietrangelo:

Enclosed is a summary of our joint NRC/Technical Specifications Task Force (TSTF) Owners Group meeting at the Nuclear Regulatory Commission in Rockville, Maryland on January 19, 2001. Should the TSTF have any comments or questions, please do not hesitate to contact me on 301-415-1161 or by e-mail at wdb@nrc.gov.

Sincerely,

R/A

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

Project No. 689

Enclosures: As stated (2)

cc: B. Bradley, NEI
D. Hoffman, EXCEL
N. Clarkson, BWOOG
H. Pontious, BWROG
T. Weber, CEOG
S. Wideman, WOG
J. Arbuckle, WNP2
B. Woods, SONGS

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DATE	1/25/01	1/25/01	1/25/01	1/25/01

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ATTENDEES LIST
NRC/TSTF OWNER'S GROUP MEETING
January 19, 2001

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Bob Dennig	NRC/NRR/DRIP/RTSB	301-415-1158
Bill Beckner	NRC/NRR/DRIP/RTSB	301-415-1161
Nanette Gilles	NRC/NRR/DRIP/RTSB	301-415-1180

January 19, 2001

Staff met with the Nuclear Energy Institute Technical Specification Task Force (NEI TSTF) on January 19, 2001.

The meeting opened with a purpose statement from Bill Beckner, NRC/NRR/DRIP/RTSB. Additionally, Mr. Beckner relayed information regarding NRC's public meeting commitment policy and distributed NRC Form 659, "NRC Public Meeting Feedback" for participants to express their views on the stated meeting.

The first item discussed on the agenda was the Risk-Informed Technical Specifications - Status of Initiatives.

The staff indicated that the review of TSTF-358 involving Initiative 2 on missed surveillance requirements was nearing completion and that it should complete preparation of the draft safety evaluation for public comment by the end of January.

The staff also indicated that it was close to completing the review of the CEOG report on Initiative 1 concerning technical specification end states and that a safety evaluation would be finalized following the completion of work on Initiative 2.

The industry provided information on TSTF-359 involving Initiative 3 on mode restraint flexibility and stated that Revision 1 to the TSTF should be submitted by the end of February 2001.

With regard to Initiative 6 on LCO 3.0.3, a CEOG technical report has been completed and will be submitted for staff review in January, ahead of the submittal of the TSTF, to facilitate early staff review.

Publication of and post Revision 2 process were the next items on the agenda.

The staff and the TSTF indicated that their review of Draft Rev. 2 had been completed. It was agreed to consolidate a master record of comments. The staff announced a tentative publication date of April 2001. The TSTF presented their concepts of prioritization of post revision 2 travelers (enclosure 2). The staff agreed that this was a good initial starting point.

There was minimal discussion of Topical Reports and TSTFs. Staff clearly stated agency policy regarding fee recovery issues related to both items.

Other items discussed included: 1) Snubber Inoperability affects on Tech Spec Systems - The TSTF OG will submit a TSTF proposal to create a TS 3.0.8, which will provide delay times for Technical Specification entry for inoperable non-TS support systems. The non-TS systems will be explicitly listed, with its associated delay time. Justifications for each system/delay time will be provided. The proposed TSTF should be to the NRC by March, and will be a good candidate for the CLIIP process. 2) The TSTF OG will submit a revised Writer's Guide in the March-April time frame, for NRC review and endorsement (a simple endorsement, such as in meeting minutes or a memorandum would suffice). 3) The TSTF OG will submit revised Conversion Guidance at the end of the summer, for NRC review and endorsement. 4) Bill Beckner was invited to attend the next Joint Owners Group Meeting on March 7, to discuss STS Conversions and issues. Lastly, the next TSTF meeting will be held after the upcoming RIC which is in March; a specific date has not been set.

Industry Prioritization of Post Revision 2 Travelers

In order to ensure that all generic changes proposed by the Industry and reviewed by the NRC are processed in a timely and efficient manner, it is necessary to prioritize those changes. There are two criteria for prioritization: 1) benefit to operation or safety, and 2) number of plants that indicate they would adopt the change when approved.

PRIORITY RANKING

Benefit \ Adoption	Significant Adoption	General Adoption	Minimal Adoption
Large Benefit in Operation and / or Safety			Medium
Moderate Benefit in Operation and / or Safety		Medium	Medium
Minimal Benefit in Operation or Safety	Medium	Medium	

Each category used in the Table is discussed below.

Benefit Categories

Large Benefit in Operation and / or Safety

This category of change would include items that provide substantial operational cost savings or significantly improves safety. Examples of this type of generic change for operational savings are implementation of Appendix J, Option B, the relaxation of shutdown containment closure in TSTF-51, and TSTF-360 improvements in batteries and D.C. distribution. An example of large benefit in safety is the clarifications of the Channel Calibration definition in TSTF-205. These changes are typically large, general changes in the ISTS. A general rule of thumb for "large benefit in operation" is that this type of change is expected to save a plant over \$100,000 over the life of the plant after adoption.

Moderate Benefit in Operation and / or Safety

This category of change would include items that provide moderate operational cost savings or marginally improve safety. Examples of this type of generic change for operational savings are extended Completion Times and Surveillance Frequencies. An example of a marginal safety benefit would be providing an appropriate action when an LCO 3.0.3 entry and eventual unit shutdown would otherwise be required.

Minimal Benefit in Operation or Safety

This category of change would include items that provide minimal operational cost savings or marginally improve safety. Examples of this type of generic change include clarifying existing Required Actions or Surveillances to make their intent clear, correcting usage errors in the ISTS, and making editorial changes to the ISTS NUREGs. These changes are important to maintain the ISTS and plant-specific ITS correct, complete, and consistent.

Industry Prioritization of Post Revision 2 Travelers

Adoption Categories

Significant Adoption	This category of change represents generic changes for which a large fraction (approximately two-thirds, or more) of the plants to which the change is applicable have indicated a desire to adopt the change after approval.
General Adoption	This category of change represents generic changes for which a majority of the plants to which the change is applicable have indicated a desire to adopt the change after approval.
Minimal Adoption	This category of change represents generic changes for which a small fraction (approximately one-third, or less) of the plants to which the change is applicable have indicated a desire to adopt the change after approval.

Application of Priorities

In order to avoid a situation in which all resources are expended processing high priority changes, the Industry must assign the category sparingly. This may require changing the priority of a generic change under NRC consideration to "make way" for a higher priority change. It is expected that in an equilibrium condition and over a fiscal year, the Industry and the NRC will expend their available resources to address the high, medium, and low priority changes as resources are available.

Schedule

The Industry and the NRC will periodically review the list of pending travelers to assess the implementation of this priority process. The goal will be to resolve high priority changes within 6 months after receipt by the NRC, medium priority changes within 12 months, and low priority items within 18 months. The Industry and the NRC will work to ensure that no generic changes remain under NRC review for greater than 18 months.

GENERIC CHANGE CLASSIFICATIONS AND REQUIRED JUSTIFICATION

Each Traveler proposed by an Owners Group shall be classified as described below. The TSTF may confirm or alter that classification. The level of justification varies based on the classification.

Editorial Change	Editorial changes are obvious editorial corrections which do not change the intent of the ISTS. Editorial changes do not require significant justification and no NSHC is required.
Bases Change	Any change which only affects the ISTS NUREG Bases can be adopted on a plant-specific basis without NRC approval under the ISTS Bases Control Program. Therefore, an SE quality justification and NSHC are not typically required for an ISTS Bases change.
NUREG Change	This is a change made to make the NUREG be internally consistent and externally consistent with the other ISTS NUREGs and follow the use and application rules such as definition changes and Note movement. These changes do not typically change the intent of the existing specifications, but rather clarify their use. These changes are not typically significant enough to warrant the cost for a converted ISTS plant to adopt the change. Therefore, an SE quality justification is not typically required for these changes and a NSHC is not typically required. However, if the consistency error is so significant that it is likely to be adopted by converted plants under license amendment, an SE quality justification and NSHC are required.
Technical Change	This is a change which revises the current intent and application of the ISTS. For example, changes made to address Conditions not currently provided for in the NUREG, such as breach of control room boundary, steam generator alternate repair methods, and inoperable steam driven AFW pump after a refueling. Also in this group are changes made to implement new technical positions such as such IEEE-450, extended Surveillance Frequencies, Steam Generator tube inspection program, risk-informed changes, and new Ultimate Heat Sink actions. An SE-quality justification and NSHC are required. For changes which have already been reviewed and approved by the NRC, such as those resulting from new regulations, generic correspondence, and approved Topical Reports, the Safety Evaluation or justification provided in the NRC document is used as the Safety Evaluation quality justification. A NSHC is required.