

May 22, 2001

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

SUBJECT: MARCH 22, 2001: SUMMARY OF MEETING WITH RISK-INFORMED  
TECHNICAL SPECIFICATION TASK FORCE (RITSTF)

Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the RITSTF. The meeting was held at the Nuclear Regulatory Commission offices in Rockville, Maryland, on March 22, 2001.

Sincerely,

***/RA/***

Robert L. Dennig, Acting Chief  
Technical Specifications Branch  
Division of Regulatory Improvement Programs  
Office of Nuclear Reactor Regulation

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

cc w/encls: See attached list

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OFFICE	NRR/DRIP/RTSB	NRR/DRIP/RTSB
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DATE	0 5/21/01	05/22/01

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cc via e-mail:

Mr. Tony Pietrangelo  
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. Roger Huston  
Licensing Support Services

Mr. Gary Chung  
Southern California Edison

Mr. Rick Hill  
General Electric Nuclear Energy

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

Mr. Noel Clarkson  
Duke Energy Corporation

Mr. Donald Hoffman  
EXCEL Services Corporation

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## SUMMARY OF MARCH 22, 2001 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 March 22, 2001, from 9:30 am-12:30 pm. The meeting agenda is provided in Enclosure 2 and the attendee list is in Enclosure 3.

The NRC staff discussed the status of the review of TSTF-358 (Initiative 2) which concerns requirements related to missed surveillances. The staff discussed the potential need for interaction with the Risk-Informed Licensing Panel and the staff's commitment to provide the *Federal Register* Notice package to the Advisory Committee on Reactor Safeguards and to the NRC Regional Offices for information prior to publication of the package in the *Federal Register* for public comment. The staff stated that they believed they could have the proposed changes published in the *Federal Register* for comment in May 2001. The industry representatives commented that the faster the package could be published for comment, the better for them to be able to demonstrate the success of the RITSTF activities. The staff agreed but stated that it was better to flush out stakeholder concerns early in the risk-informed technical specification process because the later initiatives would involve greater complexity.

Representatives from the Nuclear Energy Institute (NEI) stated that they were preparing a "white paper" on the RITSTF initiatives and that the RITSTF members were reviewing the paper. NEI stated that they hoped to provide the paper to the NRC staff in May 2001 for information and discussion.

The group discussed TSTF-359 (Initiative 3) concerning mode restraint flexibility. The NEI Technical Specification Task Force (TSTF) had recently submitted Revision 5 of TSTF-359 to the staff for review. NEI suggested that the group schedule a meeting early in the summer to discuss the changes in this revision. NEI also suggested that the group might benefit from a broader NRC audience at such a meeting. NEI stated that TSTF-359 contains some techniques that will be built upon in later initiatives.

There was a brief discussion of Initiative 1 related to safe end states. The staff has been reviewing topical reports from both the Combustion Engineering Owners Group and the Boiling Water Reactor Owners Group (BWROG) on this subject. Industry representatives stated that they expected a TSTF change package for both owners groups to be submitted to the staff within about one month after the issuance of the safety evaluations for the two topical reports.

The staff discussed the relative priority of TSTF change packages currently under review that would be processed under the staff's Consolidated Line Item Improvement Process (CLIIP). The priorities are (1) publication of TSTF-358 in the *Federal Register* for public comment; (2) identification of a schedule for the review of TSTF-359; and (3) publication of TSTF-360 (requirements for DC sources) in the *Federal Register* for public comment.

NEI presented the industry's approach to Initiative 4 concerning the replacement of the current system of fixed completion times with reliance on a configuration risk management program (CRMP). NEI stated that there was both a near-term and a long-term effort. The near term effort involved a more pragmatic approach which could be implemented under the current technical specification rule and within the existing technical specification framework. The near-

term effort involves implementing a CRMP with a “backstop” or not-to-exceed completion time. NEI stated that work is underway and that the effort is split into three areas: (1) work on the development of the technical specification framework and backstop; (2) work on the requirements for the analysis performed under the CRMP; and (3) work on achievable backstops or upper limits. NEI stated that the current schedule for the near-term effort is to submit a TSTF change package by the end of 2001.

One of the issues associated with Initiative 4 is how to address PRA quality. NEI indicated that some areas that present difficulty are the inclusion of analysis for shutdown modes and for external events and that these are being looked into.

NEI discussed the long-term effort underway related to Initiative 4 which is under the guidance of the executive level working group and represents a more profound change that would require rulemaking for 10 CFR 50.36. This effort would change the fundamental format of technical specifications and replace equipment configuration provisions with risk metric management. NEI stated that this effort was not as far along in schedule planning and would be discussed in more detail in the white paper that NEI was preparing. NEI also stated that they thought that this concept would go a long way toward establishing a technical specification framework for future plants.

The group discussed the synergism between Initiative 4 and Initiative 7 concerning the impact of non-technical specification support systems on technical specification Limiting Conditions for Operation. NEI stated that a TSTF change package for Initiative 7 will be submitted first and that Initiative 4 will be limited to requirements associated with equipment while Initiative 7 will address support and supported system interactions.

NEI indicated that work was underway to develop Initiative 7 and that it was being modeled after TSTF-372 related to changes in requirements for snubbers. NEI also indicated that the current work being done to develop a comprehensive definition of the term unavailability was important to the work on Initiative 7.

The group briefly discussed Initiative 5b regarding the relocation of surveillance frequencies to a licensee-controlled program outside of the technical specifications. The surveillance requirements themselves would remain in the technical specifications and would simply refer to the program for the surveillance frequency. Representatives of the BWROG indicated that they were very interested in this initiative and that they intended to begin work on this initiative and coordinate their efforts with the other owners groups through NEI. Initiative 5a regarding the relocation of surveillance requirements not related to safety is currently being worked by the TSTF.

With regard to Initiative 6 concerning requirements related to LCO 3.0.3, the staff indicated that it is reviewing a report submitted by the CEOG and expects to complete its review this summer.

With regard to Initiative 8 concerning the removal or relocation of non safety systems and non risk significant systems out of technical specifications, NEI stated that it is considering splitting this initiative into two parts. One part would to address an option that would not require rulemaking but would rely on re-analyzing the risk associated with systems that were retained in technical specifications under Criterion 4 of 10 CFR 50.36(c)(2)(ii). The second part would

require rulemaking to allow systems of low safety significance to be removed from technical specifications even if they met Criterion 1, 2, or 3 of 10 CFR 50.36(c)(2)(ii).

During discussion of the various initiatives under consideration, the staff indicated that it believed that the current guidance related to risk-informed technical specification changes, Regulatory Guide 1.177, may not be suitable to address the current group of initiatives being proposed by the industry and that some thought should be given to revising or eliminating the current guidance.

Finally, the group agreed to meet again on May 24, 2001, when NEI would present the white paper on the collective set of RITSTF initiatives.

Agenda for RITSTF Meeting  
Thursday, March 22, 2001  
9:30 a.m. - 12:30 p.m.  
TWFN Room 7A1

Purpose: (1) To provide stakeholders with an understanding of the process, priority, and schedule for review of TSTF-358 and TSTF-359.  
(2) To discuss industry's proposals for general approaches to Initiatives 4 and 7.<sup>1</sup>

<u>Agenda Item</u>	<u>Time</u>
Introduction and adoption of agenda	9:30 am - 9:45 am
Status and priority of TSTF-358 (Initiative 2) and TSTF-359 (Initiative 3)	9:45 am - 10:15 am
Discussion of proposed approach to Initiative 4 to replace the current system of fixed completion times with reliance on a configuration risk management program (CRMP)	10:15 am - 11:15 am
Break	11:15 am - 11:30 am
Discussion of proposed approach to Initiative 7 to define actions to be taken when equipment is not operable but is still functional	11:30 am - 12:15 pm
Wrap up and discuss next steps	12:15 pm - 12:30 pm

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<sup>1</sup>See attached list of Risk-Informed Technical Specification Initiatives.

The industry has identified eight initiatives to date for risk-informed improvements to the STS, summarized below.

Initiative
1. Define the preferred end state for technical specification actions (usually Hot Shutdown for PWRs).
2. Increase the time allowed to delay entering required actions when a surveillance is missed based on a risk assessment.
3. Modify existing mode restraint logic to allow greater flexibility (i.e., use risk assessments for entry into higher mode limiting conditions for operation (LCOs) based on low risk).
4. Replace the current system of fixed completion times with reliance on a configuration risk management program (CRMP).
5. Optimize surveillance frequencies.
6. Identify conditions leading to entry into LCO 3.0.3 and perform a risk-informed evaluation of the conditions to determine whether it is acceptable to allow continued operation for some period of time.
7. Define actions to be taken when equipment is not operable but is still functional.
8. Remove/relocate all non risk significant systems out of TS.

## Meeting Attendees

<u>Name</u>	<u>Affiliation</u>
Ray Schneider	Westinghouse/CEOG
Alan Hackerott	Omaha Public Power District/CEOG
Biff Bradley	Nuclear Energy Institute
Tony Pietrangelo	Nuclear Energy Institute
Tony Brooks	Nuclear Energy Institute
Mike Schoppman	Nuclear Energy Institute
Donald Hoffman	EXCEL Services
Jerry André	Westinghouse/WOG
Jim Andrachek	Westinghouse/WOG
Jack Stringfellow	Southern Nuclear Company
Rick Hill	General Electric
J. E. Rhoads	Energy Northwest/BWROG
Mike Kitlan	Duke Power/BWOG
Frank Rahn	Electric Power Research Institute
Nancy Chapman	SERCH/Bechtel
Deann Raleigh	LIS/Sciencetech
Roger Huston	Licensing Support Services
Millard Wohl	NRC/NRR/SPSB
Nick Saltos	NRC/NRR/SPSB
Bob Dennig	NRC/NRR/RTSB
Cynthia Carpenter	NRC/NRR/DRIP
Dale Thatcher	NRC/NRR/IQPB
Kamal Naidu	NRC/NRR/IQPB
Nanette Gilles	NRC/NRR/RTSB