July 12, 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 June 27, 2001. Should the TSTF have any comments or questions, please do not hesitate to contact me on 301-415-1156 or by e-mail at rld@nrc.gov.

Sincerely,

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

Project No. 689

Enclosures: As stated (5)

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

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OFFICE	RTSB/DRIP		AC:RTSB/DRIP	
NAME	LAHill		RLDennig	
DATE	07/12/01		07/12/01	

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Staff met with the Nuclear Energy Institute Technical Specification Task Force (NEI TSTF) on June 27, 2001.

The first item discussed was the Topical/TSTF/CLIIP Process, (enclosure 1). Bob Dennig explained the process of the TSB staff wanting to compile the data related to these items and walked the NEI TSTF through the handout.

Steve Wideman of WCNOC opened the discussion on establishing priorities and schedules (enclosure 2). Mr. Wideman expressed the Owner's Group (OG) concerns with what they perceive as not enough effort on staff part in completing medium and low priority TSTFs as well as a significant delay in high priority TSTFs. The OG stated that it will be submitting more than forty changes to the STS Rev. 2. Bob Dennig reassured the OG that the NRC is aware of their concerns; however, TSB cannot currently support a large number of TSTF changes and issued a Draft of current pending TSB TSTF actions, (enclosure 3). He informed the OG that TSB needs to know of additional planned STS Conversions in order to be prepared for the future workload.

Mr. Wideman discussed the OG preference on approval letters as they related to CLIIP items, specifically, TSTF-358. Mr. Dennig explained that TSB cannot provide an approval letter for TSTF-358 or any other TSTF that is going through the CLIIP process until it has gone through the public comment period. Further discussions on this topic related to the TSTF OG desire to have a chance to discuss TSB/NRC changes to TSTF prior to the TSTF being noticed for public comment, retaining as much as possible the TSTF process of a negotiated, mutually acceptable and correct resolution of the proposed TSTF changes. To the degree the schedule permits and the technical nature of TSB/NRC change warrants, TSB will follow the established TSTF process. The TSTF OG will provide information on other TSTFs they wish CLIIPed; i.e., TSTF-287, -283, -204, -364. The TSTF OG will be the keeper of the “Master List” of TSTFs and their priorities. The “Top Ten CLIIP List” is now defunct.

David Skeen discussed the deletion of the Monthly Operating Report (MOR). Staff is open to removing this information from the Technical Specifications with the understanding that staff can receive the information from some other source.

Kerri Kavanagh of TSB presented information regarding TSTF-372 and BWROG End State Topical Report.

TSTF-372 proposes a new LCO 3.0.8 for selected support systems delay time. The selected systems which are proposed to be added to the new LCO were removed from the standard technical specifications because they did not meet the requirements of 10 CFR 50.36. This has caused an unexpected burden on the licensees. A handout was provided to the TSTF members discussing the history of delay times for the selected support systems (enclosure 4). Most of the proposed delay times did not match the delay times that were in the old standard technical specifications. Justification for the proposed change was only provided for the snubbers and not the other selected support systems.

TSTF-372 has been connected with initiative 7, non technical specification support system impact on technical specification LCOs. The staff will review the industry white paper on initiative 7 which is due to the staff the first week of July and evaluate the implementation

process for both initiative 7 and the TSTF. The staff will discuss their findings with the RITSTF at the next meeting on July 31, 2001. The staff will also evaluate handling snubbers as a special case since a quick review has been requested by the industry.

BWROG End State Topical Report

A discussion was held with handouts (enclosure 5) on the BWROG End State Topical Report. The staff observed that the BWROG was supposed to follow the topical report from the CEOG. This was not the case and will make the review less timely. The BWROG report is not limited to the change of end states from Mode 4 to Mode 3. The BWROG report also proposes changes to 3.0.3 end states and elimination of reducting reactor pressure to less than or equal to 150 psig. The staff also observed that the BWROG report proposes new conditions for some of the LCOs. However, these new conditions were not discussed.

Mike Snodderly of DSSA/SPSB discussed the staff's position on possible TSTFs involving Integrated Leak Rate Testing Intervals and Hydrogen Control

A discussion was held regarding possible TSTFs on extended type A leak rate test intervals and Hydrogen Control. A public meeting is scheduled for July 12, 2001 to discuss a possible risk-informed initiative to extend integrated leak rate test intervals. On June 22, 2001, BWROG topical report was received that could result in changes to generic technical specifications involving hydrogen recombiners, and hydrogen and oxygen monitors. Additional discussions were held regarding the importance of the TSTF working group to prioritize future TSTFs relative to existing TSTFs and other impending staff actions such as risk-informed rulemaking to eliminate the need for hydrogen recombiners.

Other items discussed included: 1) Revision 2 Issues - Note Alignment, TSB expressed concerns that there were inconsistencies among the utilities markups for Revision 2, therefore TSB attempted to create uniformity throughout the NUREG Series. The TSTF OG stated that it would provide TSB the most recent version of the Writer's Guide. 2) Process for posting revisions - The new Revision History Style was discussed and the format agreed upon as depicted in the May 29, 2001 letter from NEI. Additionally, it was agreed that approved incorporated TSTF would be email to the TSTF OG for review prior to being posted to the Internet. Lastly, the next TSTF meeting is tentatively scheduled for September 20, 2001.

ATTENDEES LIST
NRC/TSTF OWNER'S GROUP MEETING
June 27, 2001

NAME	ORGANIZATION	PHONE#
Mike Schoppman	NEI	202-739-8011
John Arbuckle	Energy Northwest/TSTF	509-37-4601
Bob Tjader	NRC/NRR/RTSB	301-415-1187
Bob Dennig	NRC/NRR/RTSB	301-415-1156
Leslie Hill	NRC/NRR/RTSB	301-415-2158
Kerri Kavanagh	NRC/NRR/RTSB	301-415-3743
Steve Wideman	WCNOC/TSTF	620-364-4037
Thomas Weber	PVNGS/CEOG	623-393-5764
Brian Mann	Excel/TSTF	301-984-4400
Donald Hoffman	Excel/TSTF	301-984-4400
Noel Clarkson	Duke/BWOG/TSTF	864-885-3077
Bill Reckley	NRC/NRR/DLPM	301-415-1323
Pete Hearn	NRC/NRR/RTSB	301-415-1189
Mike Snodderly	NRC/NRR/DSSA/SPSB	301-415-2047
Bob Giardina	NRC/NRR/RTSB	301-415-3152
David Skeen	NRC/NRR/DRIP	301-415-2803

MILESTONES FOR RITS INITIATIVES

Initiative	OG	1 - TOP OG SUB	2 - TOP NRC RAI	3 - TOP RES RAI	4 - TOP NRC SER	TSTF #	5 - TSTF NEI SUB	6 - TSTF NRC RAI	7 - TSTF RES RAI	8 - TSTF NRC APP	CLIIP Y/N	9 - CLIIP FRN/SE	10-CLIIP COM RES	11-CLIIP AVAIL/FRN
1	CE	5/00 C	C	C	6/30/01	TBD	7/31/01	8/31/01	9/14/01	10/1/01	YES	10/31/01	12/1/01	12/31/01
1	GE	3/30/01C			12/31/01	TBD					YES			
1	W					TBD					YES			
1	BW					TBD					YES			
2	ALL	NA	NA	NA	NA	358	C	C	C	C	YES	6/14/01C	8/1/01	8/15/01
3	ALL	NA	NA	NA	NA	359	C	C	C	9/28/01+	YES			
4b	ALL	Concept Paper 7/1/01												
5	ALL	Concept Paper 7/1/01												
6a	ALL	Pending 6b/c resolution												
6b/c	CE	1/01C	5/9/01C	8/15/01	9/14/01	TBD	8/15/01	9/14/01	10/15/01	11/15/01	YES	11/30/01		
6b/c	GE					TBD					YES			
6b/c	W					TBD					YES			
6b/c	BW					TBD					YES			
7	ALL	Concept Paper 7/1/01												
8	ALL	Concept Paper 2002												

Enclosure 1

6/27/01

Milestones Legend:

Topical
1. OG Submit Topical
2. NRC Staff review topical and prepare RAIs
3. Resolve RAIs/Issues
4. NRC Staff SER on Topical

TSTF
5. NEI Submit TSTF
6. NRC Staff Review TSTF Submittal
7. Resolve TSTF Issues & NEI submit final TSTF
8. RTSB approve TSTF

CLIIP
9. FRN proposed TSTF change (Staff prepare model SE/NSHC)
10. Incorporate/address public comments
11. FRN Announcing availability of CLIIP/TSTF

MILESTONES FOR RI AOT EXTENSIONS

TOP/ TITLE	OG/ PRI	1 - TOP OG SUB	2 - TOP NRC RAI	3 - TOP RES RAI	4 - TOP NRC SER	TSTF #	5 - TSTF NEI SUB	6 - TSTF NRC RAI	7 - TSTF RES RAI	8 - TSTF NRC APP	CLIIP Y/N	9 - CLIIP FRN/SE	10-CLIIP COM RES	11-CLIIP AVAIL/FRN
WCAP-15049 ACCUM	W	C	C	C	C	370					YES			
CEOG-NPSD-1168 CIV CT	CE	C	C	C	C	373					YES			
WCAP-15376 RT/ESF	W 1	C			[9/01]	411	5/29/01C				YES			
WCAP-15622 AC PWR	W	[6/01]									TBD			
CE-NPSD-1184 DC PWR	CE	C	C	C	C	N/A					NO			
CE NPSD-1045-A SPRAY	CE 2	C	C	C	C	409	5/29/01C							
WCAP-[] FLUID SYS CT	W													

6/27/01

TOP/ TITLE	OG/ PRI	1 - TOP OG SUB	2 - TOP NRC RAI	3 - TOP RES RAI	4 - TOP NRC SER	TSTF #	5 - TSTF NEI SUB	6 - TSTF NRC RAI	7 - TSTF RES RAI	8 - TSTF NRC APP	CLIIP Y/N	9 - CLIIP FRN/SE	10-CLIIP COM RES	11-CLIIP AVAIL/FRN
WCAP-[] GEN CT	W													
WCAP-[] DC PWR	W													

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MILESTONES FOR NON-RI TS CHANGES

TOP/ TITLE	OG/ PRI	1 - TOP OG SUB	2 - TOP NRC RAI	3 - TOP RES RAI	4 - TOP NRC SER	TSTF #	5 - TSTF NEI SUB	6 - TSTF NRC RAI	7 - TSTF RES RAI	8 - TSTF NRC APP	CLIIP Y/N	9 - CLIIP FRN/SE	10-CLIIP COM RES	11-CLIIP AVAIL/FRN
N/A DC BAT	ALL [1]	N/A	N/A	N/A	N/A	360	C	C	C	C	YES			
N/A Bases Control	ALL [1]	N/A	N/A	N/A	N/A	364	C	C	C	C	YES			
CE-NPSD-1167 RTT	ALL [1]	C	C	C	C	368-CE 111-W 332-GE	C				YES			
N/A-Del MOR	ALL [1]	N/A	N/A	N/A	N/A	369	C				YES			
N/A Sup Sys Inop	ALL [1]	N/A	N/A	N/A	N/A	372	C				YES			
TBD PASS ELIM	BW GE [1]					TBD					YES			
LCO AP 3.6.2.5 3.6.3.3	GE4 2	N/A	N/A	N/A	N/A	403	5/29/01C							

TOP/ TITLE	OG/ PRI	1 - TOP OG SUB	2 - TOP NRC RAI	3 - TOP RES RAI	4 - TOP NRC SER	TSTF #	5 - TSTF NEI SUB	6 - TSTF NRC RAI	7 - TSTF RES RAI	8 - TSTF NRC APP	CLIIP Y/N	9 - CLIIP FRN/SE	10-CLIIP COM RES	11-CLIIP AVAIL/FRN
SDV Actions 3.1.8Bas	GE 2	N/A	N/A	N/A	N/A	404	5/29/01C							
CE NPSD 911-A MTC	CE 2	C	C	C	C	406	5/29/01C							
CEN-403 RELAY TEST	CE 2	C	C	C	C	407	5/29/01C							
CE NPSD-683 PTLR	CE 2	C	C	C	C	408	5/29/01C							
3.3.1 SG TRIP	CE 3	N/A	N/A	N/A	N/A	410	5/29/01C							
SR 3.8.1.13 BASES	ALL 4	N/A	N/A	N/A	N/A	400	5/29/01C							
3.6 BASES	ALL 4	N/A	N/A	N/A	N/A	401	5/29/01C							
3.8.1 BASES	ALL 4	N/A	N/A	N/A	N/A	402	5/29/01C							
3.10.1 BASES	GE 4	N/A	N/A	N/A	N/A	405	5/29/01C							

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Owners Group	Non TS support System	TSTF-372 Proposed Delay Time	Previous Standard TS Delay Time
CEOG	Snubbers[1]	[72] hours	72 hours (3/4.7.9)
NUREG-0212 Revision 1	[Containment] Structural Integrity - Average group tendon prestressing force less than minimum required[2]	[72] hours	24 hours (3/4.6.1.7) for atmospheric and prior to increasing RCS temp above 200F for dual
	[Containment] Structural Integrity - Abnormal degradation other than above[3]	[15] days	N/A
	Containment Penetration Conductor Overcurrent Protective Devices[4]	[72] hours	72 hours (3/4.8.3.1)
	Motor Thermal Overload Devices[5]	[72] hours	(3/4.8.3.2) no delay time - declare affected valves inop and enter Action statement
	Area Temperature Monitoring[6]	[72] hours	4 hours for equipment operating (3/4.7.13) see spec - need more than info than currently proposed
BWOG	Snubbers	[72] hours	72 hours (3/4.7.9)
NUREG-0103 Revision 3	[Containment] Structural Integrity - Average group tendon prestressing force less than minimum required[7]	[72] hours	24 hours (3/4.6.1.7) for atmospheric and prior to increasing RCS temp above 200F for dual
	[Containment] Structural Integrity - Abnormal degradation other than above	[15] days	N/A
	Containment Penetration Conductor Overcurrent Protective Devices	[72] hours	72 hours (3/4.8.3.1)

Owners Group	Non TS support System	TSTF-372 Proposed Delay Time	Previous Standard TS Delay Time
BWOG	Motor Thermal Overload Devices	[72] hours	(3/4.8.3.2) no delay time - declare affected valves inop and enter Action statement
	Area Temperature Monitoring	[72] hours	4 hours for equipment operating (3/4.7.13) see spec - need more than info than currently proposed
WOG	Snubbers	[72] hours	72 hours (3/4.7.9)
NUREG-0452 Revision 4	[Containment] Structural Integrity - Average group tendon prestressing force less than minimum required[7]	[72] hours	24 hours (3/4.6.1.7) for atmospheric and prior to increasing RCS temp above 200F for ice condenser
	[Containment] Structural Integrity - Abnormal degradation other than above	[15] days	N/A
	Containment Penetration Conductor Overcurrent Protective Devices	[72] hours	72 hours (3/4.8.4.1)
	Motor Thermal Overload Devices	[72] hours	(3/4.8.4.2) no delay time - declare affected valves inop and enter Action statement
	Area Temperature Monitoring	[72] hours	8 hours (4 hours if exceeding temp by 30 F) (3/4.7.13) see spec - need more than info than currently proposed
BWR/5	Snubbers	[72] hours	72 hours (3/4.7.5)
BWR/5	[Containment] Structural Integrity - Average group tendon prestressing force less than minimum required[8]	[72] hours	24 hours (3/4.6.1.5)

Owners Group	Non TS support System	TSTF-372 Proposed Delay Time	Previous Standard TS Delay Time
NUREG-0123 Revision 3	[Containment] Structural Integrity - Abnormal degradation other than above	[15] days	N/A
	Containment Penetration Conductor Overcurrent Protective Devices	[72] hours	72 hours (3/4.8.3.2)
	Motor Thermal Overload Devices	[72] hours	(3/4.8.3.3) no delay time - declare affected valves inop and enter Action statement
	Area Temperature Monitoring	[72] hours	4 hours (3/4.7.9) and declare the equipment in the area inoperable.

Notes:

1. The hydraulic snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems are maintained during and following a seismic or other event initiating dynamic load.

2/3. This limitation ensures that the structural integrity of the containment steel vessel will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the vessel will withstand the maximum pressure of (40) psig in the event of a (LOCA or steam line break accident).

4. Containment electrical penetrations and penetration conductors are protected by either deenergizing circuits not required during reactor operation or by demonstrating the OPERABILITY of primary and backup overcurrent protection circuit breakers during periodic testing.

5. The OPERABILITY of the motor operated valves thermal overload protection and/or bypass devices ensures that these devices will not prevent safety related valves from performing their function.

6. The area temperature limitations ensure that safety related equipment will not be subjected to temperatures in excess of their environmental qualification temperatures.

7. This limitation ensures that the structural integrity of the containment steel vessel will be maintained comparable to the original design standards for the life of the facility. Structural

integrity is required to ensure that the vessel will withstand the maximum pressure of (48) psig in the event of a (LOCA or steam line break accident). (15 psig for ice condenser plants).

8. This limitation ensures that the structural integrity of the containment steel vessel will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the vessel will withstand the maximum pressure of (59) psig (reinforced concrete containment) in the event of a (LOCA) (steam line break accident). (48 psig for prestressed concrete containment with ungrouted tendons).

BWROG End State Topical Report

BWR/4 Proposed Changes

Scope: “The assessment considered all Tech Spec end states resulting in a cold shutdown (Mode 4). The analysis then evaluated an alternate end state of remaining in hot shutdown (Mode 3) as a preferred alternative to Mode 4. Other potential preferred alternatives, such as low power operation, were outside the scope of this study.”

Based on staff review - 3.0.3 end states were considered in this review although it was not specifically discussed in Introduction/Background. CEOG did not propose changes to 3.0.3 end states.

3.4.3 Safety/Relief Valves

Proposed Modification: Delete Required Action B.2 and add Condition C with Required Actions C.1 and C.2 to address three or more required SRVs inoperable.

Comment: No discussion of proposed Condition C. Proposed TSTF change?

3.5.1 ECCS System (Operating)

Proposed Modification: Delete Required Action B.2. Renumber Condition H (and Required Action H.1) to Condition I (and Required Action I.1). Renumber Condition G (and Required Actions G.1 and G.2) to Condition H (and Required Actions H.1 and H.2) and remove the”OR” condition. Add a new Condition G that is similar to the existing Condition G but with the first condition (“Two or more ADS valves inoperable”) deleted and Required Action G.2 deleted.

Comment: Deleting requirement G.2 does not appear to be risk-informed. Proposed TSTF change?

3.5.3 RCIC System

Proposed Modification: Delete Required Action B.2.

Comment: Doesn’t meet the definition of end state as discussed in the background section of the Topical Report.

3.6.1.6 Low-Low Set (LLS) Valves

Proposed Modification: Delete Required Action B.2 and add Condition C with Required Actions C.1 and C.2 to address two or more LLS valves inoperable.

Comment: No discussion of proposed Condition C. Proposed TSTF change?

3.6.1.7 Reactor Building-to-Suppression Chamber Vacuum Breakers

Proposed Modification: Modify Condition E to relate only to Condition C and delete Required Action E.2. Add Condition F with Required Actions F.1 and F.2 to address the required actions related to Conditions A, B, and D.

Comment: No discussion of proposed Condition F. Proposed TSTF change?

3.6.1.8 Suppression Chamber-to-Drywell Vacuum Breakers

Proposed Modification: Delete Required Action C.2 and add Condition D with Required Actions D.1 and D.2 to address Condition B.

Comment: No discussion of proposed Condition D. Proposed TSTF change?

3.6.2.3 Residual Heat Removal Suppression Pool Cooling

Proposed Modification: Delete Required Action B.2 and add Condition C with Required Actions C.1 and C.2 to address two RHR suppression pool cooling subsystems inoperable.

Comment: No discussion of proposed Condition C. Proposed TSTF change?

3.7.2 Plant Service Water System and Ultimate Heat Sink

Proposed Modification: Delete Required Action E.2 and add Condition F with Required Actions F.1 and F.2 to address the remaining portion of Condition E.

Comment: No discussion of proposed Condition F. Proposed TSTF change? STS Rev. 2 different than STS Rev. 1 (so Conditions do not match).

3.7.4 Main Control Room Environmental Control System

Proposed Modification: Delete Required Action B.2. Change Required Action D.1 to “Be in Mode 3" with a Completion Time of “12 hours.”

Comment: STS Rev. 2 different than STS Rev. 1 (so Conditions do not match).

3.8.4 DC Sources

Proposed Modification: Delete Required Action B.2.

Comment: STS Rev. 2 different than STS Rev. 1 (so Conditions do not match).

Similar comments on proposed changes to BWR/6.