

August 03, 2001

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

SUBJECT: JULY 31, 2001: SUMMARY OF MEETING WITH RISK-INFORMED
TECHNICAL SPECIFICATION TASK FORCE (RITSTF)

Dear Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the RITSTF. The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on July 31, 2001.

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. Agenda
4. Initiative 3, TSTF-359, Talking Points
5. Initiative 5 Vugraphs
6. Initiative 4 White Paper

cc w/encl: See attached list

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| NAME | TRTjader | RLDennig | WDBeckner | |
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Mr. Mike Schoppman
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Mr. Alan Hackerott, Chairman
Omaha Public Power District

Mr. Jim Kenny
Pennsylvania Power & Light 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. Rick Hill
General Electric Nuclear Energy

Mr. Michael S. Kitlan, Jr.
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Mr. Noel Clarkson
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Mr. Donald Hoffman
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SUMMARY OF THE JULY 31, 2001, NRC/INDUSTRY MEETING OF THE RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE

The NRC staff met with the NEI Risk-Informed Technical Specification Task Force (RITSTF) on July 31, 2001, from 8:30 am to 3:30 pm. The meeting attendees are listed in enclosure 2.

The agenda (enclosure 3) consisted of discussions of the eight initiatives which were divided into two groups. The first group was comprised of the four initiatives in which the NRC staff has reviews in progress, and the second group was comprised of the four initiatives which the RITSTF is still developing. Following is a brief description of the status of the initiatives in the order in which they were discussed.

Initiative 2, TSTF-358, Missed Surveillance Requirements (SR), SR 3.0.3 modifications: The NRC staff issued the Federal Register Notice (FRN) presenting the proposed TSTF-358 and associated Safety Evaluation (SE) for comment. The comments have been received and are currently being addressed. A synopsis of the comments was discussed.

Initiative 1, TS Actions End States Modifications: NRC staff review of the industry topicals supporting this Risk-Informed Technical Specifications Task Force (RITSTF) initiative have begun. The CE topical SER was issued on July 17, 2001. The BWR topical SER is in review and RAIs were issued on July 30, 2001. The RITSTF is reviewing both the CE topical SER and the BWR topical RAIs. RTSB will review and comment on CEOG's and BWROG's two different approaches to translating the topical report details into actual technical specification (TS) changes. In brief, the BWROG included changes to TS 3.0.3 end states (related to Initiative 6) and reactor pressure end states, which CEOG did not address. Also, in some TS the BWROG added additional Conditions. The BWR topical SER is scheduled to be ready for concurrence by the end of the year 2001.

Initiative 6, Modification of LCO 3.0.3 Actions and Completion Times: A CEOG submittal (on 6b/c) was received on January 24, 2001, and staff review has begun. RAIs were issued on May 9, 2001. The RITSTF is working on RAI responses.

Initiative 3, TSTF-359, Modification of mode restraint requirements of LCO 3.0.4: The RITSTF has submitted a TS change proposal (TSTF-359), and staff review has begun. The staff presented eleven talking points (enclosure 4) related to TSTF-359 in order to gain a better understanding of what the RITSTF was proposing. The most significant area of confusion was related to the RITSTF referral to risk assessments. TSTF-359 is based upon three types of risk assessment, which are not explicitly presented: the first assessment is the maintenance rule (a)(4) required risk assessments, which essentially encompasses all of the mode changes with system LCOs not fully met (emergent conditions); the second assessment is the generic assessment included in the TSTF-359 submittal that exempts systems from LCO 3.0.4 requirements, without further need for specific plant condition assessments; and, the third assessment is the plant condition specific assessment for the systems that might manifest significant risk. The resulting discussion led to the conclusion that the RITSTF would rewrite TSTF-359 to enhance its clarity. Formal RAIs will be presented to the RITSTF by August 10, 2001, and are scheduled to be resolved by August 31, 2001. The SER is scheduled to be ready for concurrence by the end of September 2001.

Initiative 5, Relocation of non-safety SRs and relocation of all SR frequency requirements out of TS: A RITSTF concept/white paper was submitted in July to the NRC, and was presented at the meeting (see enclosure 5 for the vugraphs). The NRC approved methodology for establishing appropriate surveillance frequencies (also known as surveillance test intervals (STIs)) will be invoked through a TS program in the administrative controls section of the TS. The successful implementation of this program is highly dependent upon the quality of a plant's PRA, as is the case with several other of the initiatives. RTSB will provide feedback on this white paper.

Initiative 7, Non-TS support system impact on TS operability determinations: A RITSTF concept/white paper was submitted in July and discussed at the meeting. Initiative 7 is a special case subset of Initiative 4, in which TS system inoperability is the result of an inoperable support system that is required for a very low frequency event. It is now expected that a TS 3.0.8 will initially be proposed to address only snubbers, and that TS 3.0.8 will be superseded to generically address both snubbers and other specific support systems. RTSB will provide feedback on this white paper.

Initiative 4, Risk Informed AOTs, use of a configuration risk management program (CRMP): A RITSTF concept/white paper was submitted (enclosure 6) at the meeting and discussed. The proposal involves a combination of the current TS AOTs, an (a)(4) risk assessment to determine AOT extension feasibility, and AOT backstop limits. RTSB will provide feedback on this white paper.

Initiative 8, Relocate non-risk significant systems out of TS: The RITSTF is working on this initiative.

The next RTSB/NEI RITSTF meeting is tentatively scheduled for Thursday, October 11, 2001.

It was agreed that progress was being made and that further progress is anticipated.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE
ATTENDANCE LIST
JULY 31, 2001

| <u>NAME</u> | <u>AFFILIATION</u> |
|-------------------|------------------------------------|
| BIFF BRADLEY | NUCLEAR ENERGY INSTITUTE |
| TONY PIETRANGELO | NUCLEAR ENERGY INSTITUTE |
| JACK STRINGFELLOW | SOUTHERN NUCLEAR OPERATING COMPANY |
| DONALD HOFFMAN | EXCEL SERVICES |
| JIM ANDRACHEK | WESTINGHOUSE/WOG |
| GARY CHUNG | SCE/SONGS/CEOG |
| DON MCCAMY | TENNESSEE VALLEY AUTHORITY/BWROG |
| J. E. RHOADS | ENERGY NORTHWEST/BWROG |
| RICK HILL | GE |
| NOEL CLARKSON | DUKE POWER/BWOG |
| STANLEY LEVINSON | FRAMATOME ANP |
| R. J. SCHOMAKER | FRAMATOME ANP |
| DEANN RALEIGH | SCIENTECH |
| WILLIAM BECKNER | NRC/NRR/DRIP/RTSB |
| BOB DENNIG | NRC/NRR/DRIP/RTSB |
| BOB TJADER | NRC/NRR/DRIP/RTSB |
| KERRI KAVANAGH | NRC/NRR/DRIP/RTSB |
| NICK SALTOS | NRC/NRR/DSSA/SPSB |
| MILLARD WOHL | NRC/NRR/DSSA/SPSB |
| JACK CUSHING | NRC/NRR/DLPM |
| MICHAEL SCOTT | NRC/NRR/DLPM |
| BOB PULSIFER | NRC/NRR/DLPM |

AGENDA

TSB/NEI RITSTF Meeting
July 31, 2001 from 8:30 AM to 4:00 PM
[NOTE: Room change to O-5B4]

- Initiatives with review in progress:
 - Initiative 2 (TSTF-358)
 - Initiative 1
 - Initiative 6
 - Initiative 3 (TSTF-359)

- Initiatives under development:
 - Initiative 5
 - Initiative 7
 - Initiative 4
 - Initiative 8

- Schedule Next Meeting

- Closing Comments

TALKING POINTS ON TSTF-359 R5, LCO 3.0.4 FLEXIBILITY

The changes proposed in TSTF-359 R5 are not clear. For example:

1) It is stated on page 2 of 6, "If the risk of changing MODES is determined to be greater than the acceptable risk, the configuration-specific risk evaluation may be used to determine the risk impact, and the need for risk management actions as appropriate, which may include changing MODES." It would seem that if the "risk of changing MODES is determined to be greater than the acceptable risk," the plant doesn't change MODES. This statement is not clear.

2) It is stated on page 2 of 6, "A pre-assessment or configuration-specific risk analysis is required for determination of acceptable risk ...". The terms "pre-assessment" and "configuration-specific risk analysis" need to be defined.

3) It is stated on page 2 of 6, "Entry into more than one LCO 3.0.4.b exception at the same time would be evaluated ...". It seems that each and every entry into an LCO 3.0.4.b exception should be evaluated.

4) The proposed change to LCO 3.0.4 is to retain the existing LCO 3.0.4 wording as paragraph a, and add a paragraph b for the performance of risk evaluations. It would seem that the proper change is to replace LCO 3.0.4 with paragraph b; all MODE changes while an LCO is not met would require a risk evaluation.

5) It is stated on page 2/3 of 6, "To apply the LCO 3.0.4.b exception to plant systems/components identified in the Bases as potentially higher risk than for MODE 1 operation, a plant specific justification would be required." What is meant by a "plant specific justification"; a risk evaluation; a license amendment?

6) It is stated on page 3 of 6, "Previous flexibility beyond the generic LCO 3.0.4 some plants may have had approved for LCO 3.0.4 exceptions and application may be justified using plant specific justification to be retained along with the generic LCO 3.0.4." Why?

7) It is stated on page 3 of 6, to be generically adopted by each OG STS, "The following is a list of those systems that have been generically determined to be more important to risk and do not typically have the LCO 3.0.4 exception allowed:" ...list follows...

7a) What is being implied, it seems, is that if the system does not make this list, then it will have the LCO 3.0.4 exception applied; where is the system specific analysis for each of these systems not making the list; perhaps a topical is in order?

7b) What is being implied, it seems, is that if the system does make this list, then it will be subject to the plant/line-up specific risk evaluation to determine if it can be granted an LCO 3.0.4 exception. The lists seems short, and inconsistent; the WOG list includes support systems while the B&W list doesn't, why? Once again the system specific analysis for each of these systems is needed for evaluation.

7c) What is needed is a clear statement of what it means for a system to be on this list.

8) It is stated on page 4 of 6, "This change in LCO 3.0.4 philosophy would require a change in SR 3.0.4. ..." This is the only place this potential change is discussed; will there be a TSTF to follow? Shouldn't this change be fully discussed, analyzed, and reflected in the mark-ups?

9) The first full paragraph on page 4 of 6 provides the link to the risk evaluation required by the maintenance rule. It needs to state explicitly that if an LCO is not met, then some form of (corrective) maintenance will be required to restore full operability to the system. The current statement is weak.

10) Page 1 The Need for Change paragraph, states that "allowing the unit to enter MODE of applicability for that specification would allow work to be completed without creating error likely situations....." It is not clear how stopping and not making a MODE change and not taking the risk associated with the MODE change creates an error likely situation.

11) The Bases for each specific Nureg is just a copy of the generic TSTF Bases. This results in PWRs being referenced in BWR Bases and BWRs being referenced in PWR Bases. The errors identified above apply to these pages as well.