

# AGENDA

## TSB/NEI RITSTF Meeting

December 19, 2001 from 8:30 AM to 4:00 PM, in O-4B6

- Status of Initiatives
  - Initiative 1, End States
    - BWR RAI responses under evaluation
    - SE preparation
    - TSTF submittal
  - Initiative 3, SR 3.0.4 (Mode Restraint) Flexibility
    - Content of TSTF-359 R6, NRC feedback
    - System analysis for new tables
    - TSTF submittal
  - Initiative 4, RI AOTs with CRMP
    - Industry proposed approaches, pilots
    - NRC feedback by Jan 15, 2001
  - Initiative 5, STI Evaluation Methodology
    - Response to NRC feedback
    - Revised white paper
  - Initiative 6, LCO 3.0.3 Actions and Completion Times
    - Draft response to NRC RAIs; discussions
  - Initiative 7, Non-TS Support System Operability Impact on TS System
    - TSTF submittal
- NEI presentation to the NRC staff on the 10 CFR 50.65 (a)(4) risk assessment process
- Schedule Next Meeting
- Closing Comments

## COMMENTS ON THE DRAFT TSTF-359, REV 6, ON LCO 3.0.4, MODE RESTRAINTS

- 1) JUSTIFICATION, Page 1 of 6: The last sentence in the **Need for Change** paragraph reads, "Allowing the unit to enter the MODE or other specified condition in the Applicability for a Specification for such situations would allow the work to be completed without creating the potential for error likely situations due to artificially shorter periods of time to complete all appropriate Surveillances and maintenance activities." The sentence is awkward. We understand this to mean, "In such situations, allowing the unit to enter the MODE or other specified condition in the Applicability for a Specification would allow the work to be completed while reducing the likelihood of human error caused by a rush to complete required Surveillances and maintenance activities," is that correct?
- 2) JUSTIFICATION, Page 2 of 6: Editorial change on the third line from the top of the page; the words "or" and "of" are transposed. The mid-phrase of the sentence should read, "... the Applicability for an unlimited period of time, or ...".
- 3) JUSTIFICATION, Page 2 of 6: The first sentence of the last paragraph on the page discusses "... maintaining acceptable plant risk." "Acceptable plant risk" should be defined.
- 4) JUSTIFICATION, Page 3 of 6: Sentence 3 discusses transitions toward power operation and that the "power operations' guidance of NUMARC 93-01 ... should be followed ... ." This seems to imply that transitions during shutdown operations, such as from Modes 4 to 3, or Modes 6 to 5, do not need to be addressed. Transitions during shutdown operations also need to be addressed.
- 5) JUSTIFICATION, Page 4 of 6: In the first full paragraph on the page, it is mentioned that the "oversight process would provide a significant disincentive to entering the MODE of Applicability of an LCO, and moving up in power, when there was some likelihood that the MODE would have to be subsequently exited due to failure to restore the unavailable system ... within the Completion Time." It should also be mentioned that the oversight process would also provide a significant disincentive to a MODE transition when the risk assessment indicates it is not appropriate.
- 6) JUSTIFICATION, Page 4 of 6: In the second paragraph on the page it is mentioned that the "ITS NUREGs are not totally consistent in their treatment of LCO 3.0.4." What is meant by this statement; the NUREGs appear identical?
- 7) JUSTIFICATION, Page 4 of 6: In the last sentence of the second paragraph, it states that this change will "ensure consistency in appropriate levels of risk assessment ...". The staff needs additional explanation of the meaning of this sentence.
- 8) JUSTIFICATION, Page 5 of 6: In the last sentence of the third paragraph on the page it is mentioned that, "To apply the LCO 3.0.4.b allowance to plant systems/components identified in the Bases as potentially higher risk than for MODE 1 operation, a plant specific justification would be required." (a) What does industry consider acceptable justification for applying the LCO 3.0.4.b allowance to such systems? (b) Why wouldn't a quantitative based enhanced risk assessment be appropriate to require for those systems generically determined to be important to risk and identified in the table in the Bases (flexibility proportional to capability)? (c) What are qualitative guidelines for approving a mode transition while in an LCO Condition? (d) The Bases table refers to, "systems ... more important to risk..."; wouldn't replacing the phrase "potentially higher risk than for MODE 1 operation" with "more important to risk in the mode to be entered" be more appropriate.