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March 4, 2002

Dr. William D. Beckner, Director
Operating Reactor Improvements Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: NEI/TSTF White Paper

PROJECT NUMBER: 689

Dear Dr. Beckner:

A White Paper, prepared through the cooperative efforts of the NEI Technical Specification Working Group (TSWG) and Technical Specification Task Force (TSTF), is enclosed for NRC information and use. It is entitled "Revised Process for the Management of the Improved Standard Technical Specifications NUREGs."

The paper has been reviewed by your staff, and NRC comments have been incorporated into the enclosed Revision 0 dated February 28, 2002. The objective of the paper is to simplify and streamline the STS generic change process.

Please contact me at (202) 739-8081 or Mike Schoppman at (202) 739-8011, if you have any questions or desire further communication regarding the White Paper.

Sincerely,

A handwritten signature in cursive script that reads "Anthony R. Pietrangelo".

Anthony R. Pietrangelo

Enclosure

Dr. William D. Beckner
March 4, 2002
Page 2

c: Leslie A. Hill, NRC
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NEI TSTF WHITE PAPER

**REVISED PROCESS
FOR THE
MANAGEMENT OF THE
IMPROVED STANDARD
TECHNICAL SPECIFICATIONS
NUREGS**

Revision 0

2/28/2002

**NEI TSTF WHITE PAPER
REVISED PROCESS FOR THE MANAGEMENT OF THE STS NUREGS**

Executive Summary

I. **Background**

The improved Standard Technical Specifications (STS) for B&W, Westinghouse, CE, BWR-4, and BWR-6 designs are contained in NUREGs-1430, 1431, 1432, 1433, and 1434, respectively.

The STS were developed based on the criteria in the "Final Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," July 22, 1993 (58 FR 39132). The policy statement was codified in 1995 by revising 10 CFR 50.36 (60 FR 36953). Revision 1 of each of the five NUREGs was published in April 1995. Revision 2 of each NUREG was published in April 2001.

The Consolidated Line Item Improvement Process (CLIIP) is described in Regulatory Issue Summary (RIS) 2000-06, March 20, 2000. The CLIIP facilitates licensees' adoption of NRC-accepted changes to the STS for their specific plant technical specifications.

II. **Current Situation**

Over half of the operating nuclear units in the U.S. have converted to the STS. An additional 25-30% are expected to convert within the next few years. At this point, the NRC workload of STS conversions is decreasing. At the same time, the NRC workload for other kinds of Technical Specification (TS) changes is increasing (plant-specific amendments, outage-related improvements, power uprates, risk-informed TS, etc.).

The CLIIP was initially viewed as a method of implementing most, if not all, generic STS changes. Lessons learned from initial implementation of the CLIIP show that more selective criteria are needed to identify which STS changes are appropriately implemented using the CLIIP.

NRC and industry resources are limited. Budget constraints and resource realignments have slowed the regulatory approval of STS generic changes in 2001 below the rates of approval experienced in 1999 and 2000.

NRC and NEI are exploring potential changes intended to simplify and expedite the processing of generic changes and license amendment applications based on generic changes.

III. **Revised Process for Generic Changes**

The generic change process has been successful for many years. The key measure of success is the rate of adoption of approved changes individually or as part of an STS conversion. It should remain the central component of industry's overall process for initiating, preparing, and processing STS generic changes, which are often used as the

**NEI TSTF WHITE PAPER
REVISED PROCESS FOR THE MANAGEMENT OF THE STS NUREGS**

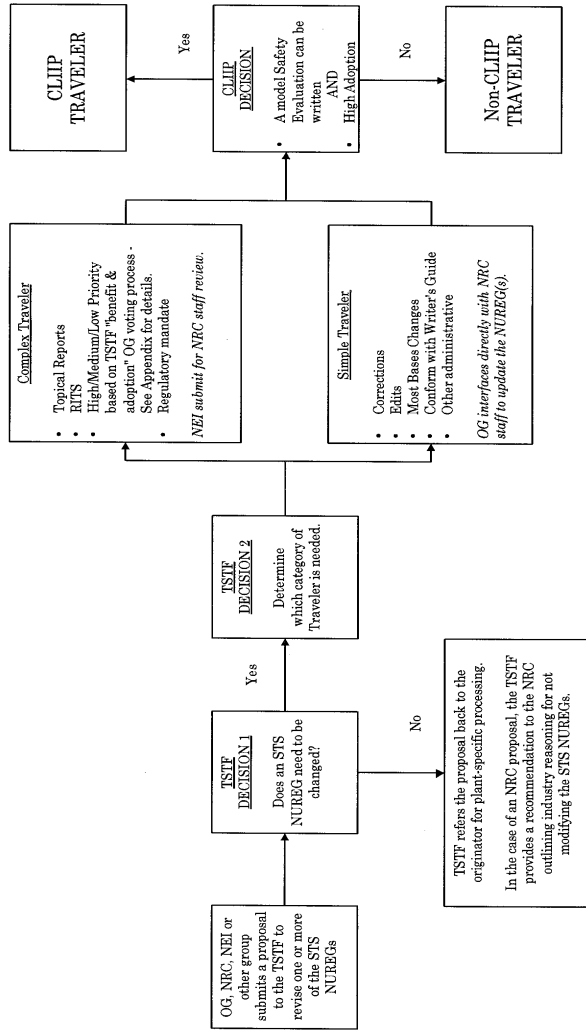
basis for plant-specific license amendments. The revised process described by this NEI White Paper is intended to simplify and streamline the STS generic change process. An overview of the revised process is provided in Figure 1. Detailed implementation of the revised process is described in an Appendix to this white paper.

The revised process incorporates three primary decision points, as shown on the following diagram:

- 1) Establish a criterion for determining whether a change is generic based on intended adoption by the industry. A proposed STS change will typically be considered generic if greater than 1/3 of the affected plants plan to adopt it. See Appendix for details (TSTF Decision 1).
- 2) Revise the Traveler process to differentiate between simple generic changes and complex generic changes. Simple generic changes are changes that can be presented and approved relatively quickly with little or no NRC technical branch involvement. These changes will be discussed and information will be exchanged in meetings between the NRC and the TSTF to permit the NRC to resolve any issues. The NRC will indicate the disposition in a letter subsequent to the meeting. Complex changes will follow a process involving formal communication through NEI. See the Appendix for details (TSTF Decision 2).
- 3) Establish a threshold for when the CLIP should be used. If a model Safety Evaluation can be written AND 2/3 or more of the affected plants plan to adopt it, a proposed STS change will be processed using the CLIP. The CLIP can be used for both simple and complex changes. See Appendix for details. (CLIP Decision).

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 REVISED PROCESS FOR THE MANAGEMENT OF THE STS NUREGS

FIGURE 1
 Revised STS Change Process



Appendix

Detailed Description of Revised Process for the Management of the Improved Standard Technical Specifications NUREGs

A revised process has been developed to better apply industry and NRC resources and to improve the timeliness of processing generic STS changes. Process details are described below and shown in a flow chart in Attachment A, "Revised STS Generic Change Process."

1. Separate Processing of Simple and Complex Changes

Many of the proposed generic changes to the STS are simple and do not require detailed technical review. The processes used to review simple changes and complex changes should be commensurate with the change's complexity. This includes the methods of communication used to discuss changes.

The definition of a simple change is subjective and is stated as, "a simple change can be presented, discussed, and approved by the NRC relatively quickly with little or no NRC technical branch involvement." Any change which does not meet this definition is considered a complex change.

Complex changes should follow a more formal route. Complex changes will be transmitted through NEI as TSTFs and all formal communication regarding those changes will be through NEI.

Simple changes will be transmitted directly from the TSTF (by EXCEL) to the NRC as TSTFs and communications regarding these simple changes will take place between the NRC and the TSTF using the most efficient process, such as e-mail and telephone conversations.

If during discussions with the NRC it is determined that a simple change is actually complex, the change will be transmitted through NEI and follow that process. Note that simple changes will continue to be prioritized in order to determine if the change is a CLIP candidate.

2. Resolve Simple Changes in Meetings

When the generic change process was first started in the early 1990's, most issues were discussed and NRC decisions announced in public meetings between the NRC and the Industry. As the process developed and became more formalized, most communication occurred in letters

between the NRC and the Industry coming to resemble the exchange of multiple rounds of Requests for Additional Information (RAIs). Such formal communication is appropriate for some types of generic changes, but for simple changes it is inefficient.

The NRC and the TSTF should discuss issues regarding simple changes in public meetings making optimal use of the time to exchange needed information to support a decision. Documentation of the review and approval will be provided by NRC letter.

The NRC and the TSTF should establish regular, frequent meetings. At each meeting, a pre-arranged set of changes should be discussed and actions assigned. This would focus the Industry and NRC efforts and greatly improve the efficiency of the process.

3. Industry to Provide Typed STS Pages with TSTFs

The STS word processing files are finely divided, with each specification in a separate file. To facilitate approval and incorporation, the Industry would provide typed STS pages with each generic change. Agreement on the typed changes would be part of the approval process of changes. Once a change is approved, the NRC simply incorporates this new file into the STS NUREGs on the web site. This will reduce the time between approval and final incorporation to a few days with no need for subsequent proofing by the Industry.

4. Identify Changes Which Are Corrections Versus Improvements

NEI 96-06, "ITS Conversion Guidance," provides a threshold for corrections to the STS. It is:

- Technical Specifications - any technical or administrative error that could reasonably lead to a misinterpretation of the technical specification, or technically incorrect information.
- Bases - any significant error that could reasonably lead to misinterpretation of the Technical Specifications, or technically incorrect information.

In order to maintain a quality document, all corrections will be processed. Early in the process, changes which are corrections are identified. Because a large majority of corrections would be simple changes, this processing could be done efficiently through meetings.

5. Do Not Process Improvement Changes Which Are Not Truly Generic

Changes classified as improvements should be generic in order to be incorporated into the STS. If less than one-third of the responding plants to which a change is applicable state that they would adopt the change, the TSTF will reconsider whether the change is generic. If the change is determined to not be generic, the change can be pursued on a plant-specific basis.

6. Revise the Criteria for Placing a Change Into the CLIIP

Experience has shown that some changes are not suitable for CLIIP. Changes should only be placed into CLIIP when:

- The change is expected to be adopted by at least two-thirds of the applicable plants within the time frame provided in Federal Register Notice. Note that it is important that the NRC allow sufficient time for licensees to apply for a change. Many plants plan their license amendment activities as part of the annual budget cycle. Therefore, eighteen to twenty-four months should be provided to submit a CLIIP amendment request to allow for planning, preparation and approval. In addition, the NRC should provide advance notice of when it plans to publish a model Safety Evaluation for comment so that licensees can plan for future license amendment requests.
- A generic Safety Evaluation can be written that encompasses the application of the change to all applicable plants.
- The change can be adopted by plants with essentially no changes.
- At least four plants plan to adopt the change. Placing a change into CLIIP requires a fixed amount of resources and adoption by less than this number of plants would result in more work to prepare the CLIIP than to process individual amendments. The affected Owners Group will evaluate the proposed change to determine if CLIIP is the most efficient process and recommend to the NRC whether or not the change should be processed under CLIIP.

7. Increase Information Gathered During Prioritization to Clearly Identify Applicable Plants

In order to support the additional decisions to be made on generic changes described above, additional information must be gathered during the Industry prioritization process. Currently, plants are asked to determine:

- 1) Benefit (large, moderate, or minimal) and
- 2) Adoption (significant, general, or minimal) (see Attachment B, Industry Prioritization of Generic Changes).

Two more pieces of information are needed:

- 3) Applicability - is the proposed generic change applicable to your plant? Applicability is based on plant design, licensing basis, and technical specifications format. If a change has already been adopted by a plant, the change is applicable to that plant.
- 4) Existing Incorporation - is the proposed generic change already incorporated in the plant's technical specifications?

In order to determine if a change to the STS is needed, it is necessary to know the number of plants to which a change applies and compare that number to the total number of plants that have already adopted the change and the number that state that they would adopt the change in the future. In order to determine if a change should be placed in the CLIIP, it is necessary to know the number of plants to which a change applies and the number of plants that state that they would adopt the change in the future.

8. Schedule Goals and Management Tools

The NRC goal is to process ninety-five percent of proposed STS generic changes within one year and all within two years. Simple changes should be processed relatively quickly. Another measure of success is whether the adoption of approved STS generic changes by plants is consistent with the projected adoption used to determine the prioritization of the change.

Management of the generic change process is important to determine if we are meeting the goals and expectations of the stakeholders (NRC, Owners Groups, NEI, TSWG). Therefore, the TSTF has developed a management overview report for tracking changes. The report tracks each change, focusing on projected completion date. Indicators are used to label the status of each change. The report is distributed monthly to all stakeholders. The TSTF will continue to distribute periodic reports giving the status of all changes.

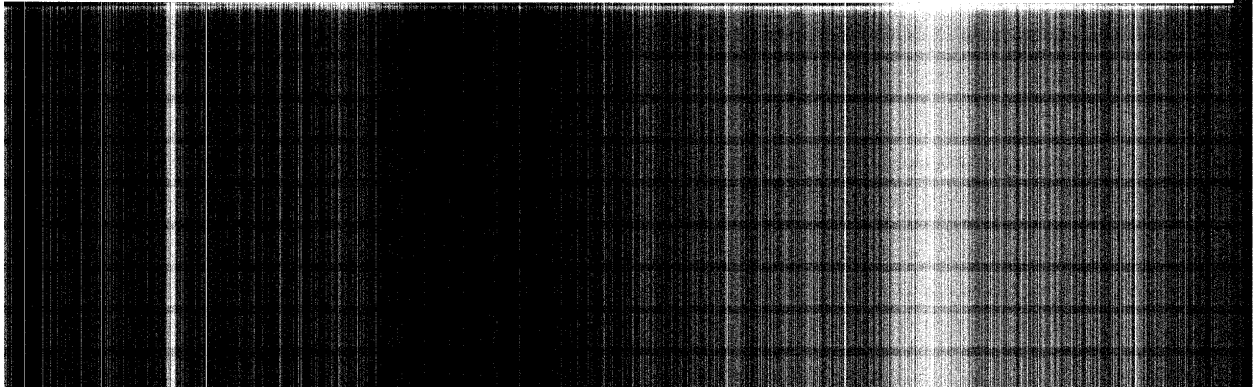
Changes, simple or complex, which cannot be resolved at the working level will be referred to NEI and NRC management for resolution.

Attachment A

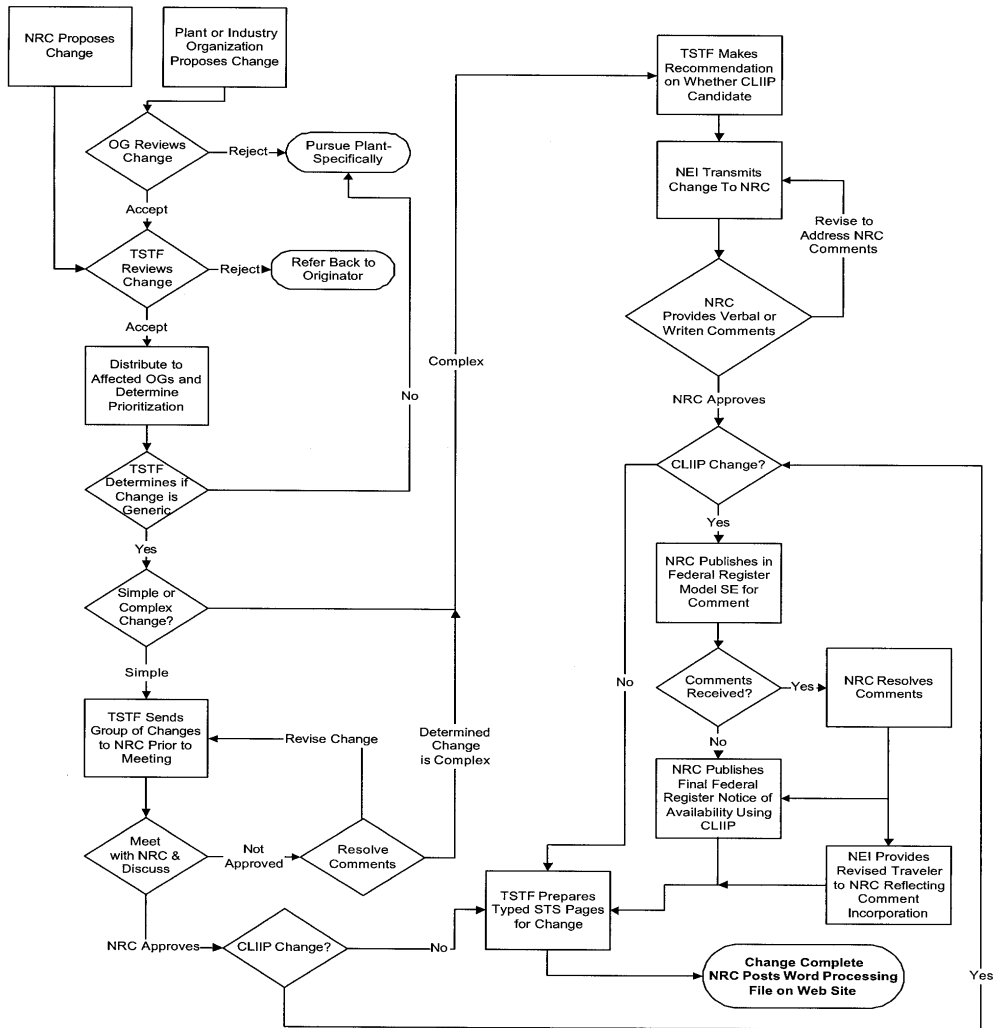
Revised STS Generic Change Process

Revision 0

2/28/2002



REVISED STS GENERIC CHANGE PROCESS

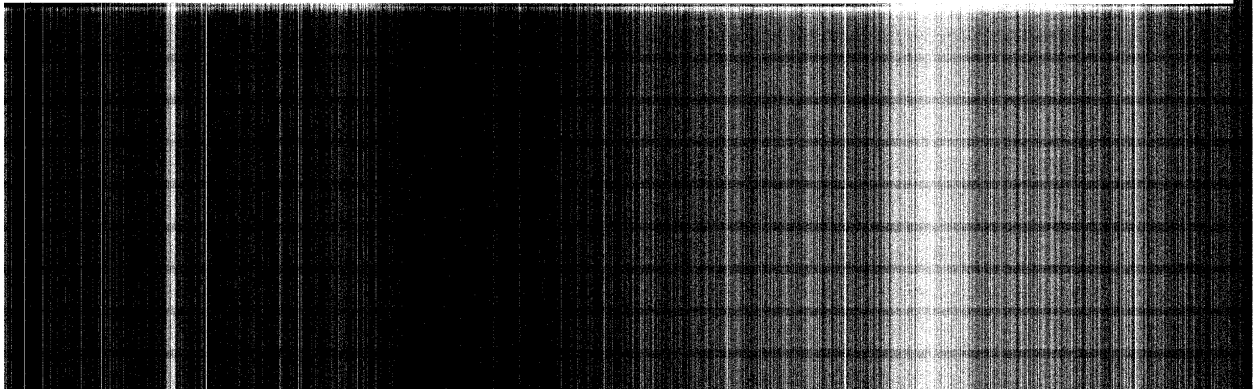


Attachment B

Industry Prioritization of Generic Changes

Revision 0

2/28/2002



Attachment B - Industry Prioritization of Generic Changes

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

<u>Benefit \ Adoption</u>	Significant Adoption	General Adoption	Minimal Adoption*
Large Benefit in Operation and / or Safety	High	High	Medium
Moderate Benefit in Operation and / or Safety	High	Medium	
Minimal Benefit in Operation or Safety	Medium		

* - Changes that will have minimal adoption may be determined to not be generic.

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 significantly improves safety or provides substantial operational cost savings. 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 STS. 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 STS, and making editorial changes to the STS NUREGs. These changes are important to maintain the STS and plant-specific ITS correct, complete, and consistent.

Attachment B - Industry Prioritization of Generic Changes

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 significant fraction 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. These changes may be determined to not be generic.

Editorial changes, Bases-Only changes, and NUREG-Only changes are not expected to be adopted by license amendment and would not be processed through the CLIP process. These changes will be given the priority "Edit / Bases."