May 22, 2002

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

SUBJECT: MAY 17, 2002: 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 May 17, 2002.

Sincerely,

/RA/

Robert L. Dennig, Section Chief Technical Specifications Section Operating Reactor Improvements Program Division of Regulatory Improvement Programs Office of Nuclear Reactor Regulation

### Enclosures:

- 1. Meeting Summary
- 2. Attendance List
- 3. Agenda
- 4. RITSTF Initiative Status

cc w/encl: See attached page

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	TRTjader	RLDennig	
DATE	05/21/2002	05/22/2002	

Mr. Biff Bradley

cc via e-mail:

Mr. Tony Pietrangelo Nuclear Energy Institute

Mr. Biff Bradley

Nuclear Energy Institute

Mr. Mike Schoppman Nuclear Energy Institute

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. Frank Rahn

**EPRI** 

Mr. Wayne Harrison

STP

Mr. Drew Richards

STP

Mr. Gabe Salamon PSEG Nuclear 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** 

Mr. Ted Book Framatech-ANP

Mr. R. J. Schomaker Framatech-ANP

Mr. J. E. Rhoads Energy Northwest

Ms. Deann Raleigh

Scientech

Mr. Ken Canavan

DS&S

Mr. Sam Chien

SCE

Mr. Gary Chung

**SCE-SONGS** 

Mr. Courtney Smyth PSEG Nuclear LLC

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JNHannon (RidsNrrDssaSplb)

TRQuay (RidsNrrDipmlqmb)

MLWohl (MLW1)

NSaltos (NTS)

JWilliams (JFW1)

WScott (WES)

JCushing (JXC9)

FMReinhart (FMR)

AWMarkley (AWM)

SLMagruder (SLM1)

RFDudley (RFD)

DFThatcher (DFT)

JEDonoghue (JED1)

MLScott

EMMcKenna (EMM)

MACunningham (MAC3)

ASKuritzky (ASK1)

ASingh (AXS3)

MTMarkley (MTM)

# SUMMARY OF THE MAY 17, 2002, 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 May 17, 2002, from 8:30 a.m. to 11:15 a.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of discussions of the seven active RITSTF initiatives. The RITSTF provided a summary of the status of the initiatives (Enclosure 4), updated to reflect the meeting's progress. Following is a brief description of the status of the initiatives in the order in which they were discussed.

Initiative 3, TSTF-359, Modification of mode restraint requirements of LCO 3.0.4: The RITSTF submitted TSTF 359, Revision 6, along with a revised analyses for the new systems tables for BWOG and WOG (the CE and BWR analyses were still applicable), on February 22, 2002, addressing the staff comments to the draft TSTF-359, Revision 6. The RITSTF did not include in TSTF-359, Revision 6, applicability to high risk systems (i.e., systems not on the tables), in response to NRC comments. In preparing the TSTF-359 SER the staff noted that the LCO 3.0.4 and SR 3.0.4 wording was not adequate. A letter describing the concern was sent on April 26, 2002, and in response to the letter TSTF-359, Revision 7 will be prepared and submitted by the RITSTF during the week of May 27, 2002. The staff schedule is for the first CLIIP Federal Register Notice to be published by June 30, 2002.

**Initiative 1**, <u>TS Actions End States Modifications</u>: The CE topical SER was issued on July 17, 2001. The BWR topical SER has been written and is in internal NRC review. A conference call may be necessary to resolve questions resulting from NRC SER review. A draft BWR topical SER will be provided the BWROG, to allow the RITSTF to map the requirements and prepare the BWR TSTF-423. The RITSTF will provide the CE TSTF-422 by June 15, 2002.

**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 it was reviewed by the staff. RAIs were issued on May 9, 2001. A conference call may be necessary to resolve questions related to safety system loss of function. A comprehensive TSTF-426, for all OGs, is planned to be submitted on September 30, 2002.

**Initiative 7**, Non-TS support system impact on TS operability determinations: The RITSTF presented an enhanced white paper at the December 19, 2001 meeting. The NRC provided feedback to this enhanced white paper on January 25, 2002. The RITSTF submitted TSTF-372, Revision 1, addressing only snubbers, on January 14, 2002. The NRC staff and the RITSTF are working together to resolve the remaining issues. A working meeting will be held to discuss issues related to TSTF-372 and Initiative 7, at the end of the TSTF meeting on June 4, 2002. The RITSTF will submit a revision to TSTF-372 by July 31, 2002. The RITSTF will subsequently submit TSTF-427 to comprehensively address Non-TS support system impact on TS operability determinations, Initiative 7.

Initiative 8a, Remove/Relocate non-safety and non-risk significant systems from TS that do not meet 4 criteria of 10 CFR 50.36: The NRC is currently developing guidance on plant specific application of Initiative 8a. The RITSTF will interface with the NRC in the development of the guidance. The RITSTF will develop: a position paper on Initiative 8a by July 31, 2002; guidance and a methodology for implementing Initiative 8a by September 30, 2002; and, a TSTF by November 30, 2002.

**Initiative 5**, Relocation of non-safety SRs (5b) and relocation of all SR frequency requirements (5a) out of TS: The RITSTF will develop a Guidance Document on an Initiative 5 methodology and provide it to the NRC by June 30, 2002. After NRC review and acceptance of the Guidance Document, the RITSTF will prepare and submit TSTF-425.

Initiative 4b, Risk Informed AOTs, use of a configuration risk management program (CRMP): The NEI RITSTF will coordinate comprehensive and multiple pilots, including CEOG, STP and Hope creek pilots. The RITSTF will seek to obtain a pilot plant that has converted to the STS. While each pilot may not address the proposed methodology completely, the RITSTF will ensure the various approaches will prove the entire proposed methodology. The RITSTF will ensure a single coordinated methodology will emerge from and be supported by the individual pilots. Some of the issues to be resolved by the pilots are: how fire and seismic events will be handled; how equipment not in the PRA will be addressed (i.e., instrumentation); how cumulative risk will be accounted for; and, how risk assessment will work in conjunction with risk management. The staff asked the RITSTF to consider a pilot that would confirm all the initiatives in order to fully demonstrate their interactions/integration. The RITSTF will provide: an integration plan with schedules by June 30, 2002; a draft guidance document by August 30, 2002; TSTF-424 by November 30, 2002; and the pilot plants will submit applications by December 31, 2002.

The next NRC TSS/NEI RITSTF meeting is scheduled for Friday, July 12, 2002; the location is to be determined.

# NRC/INDUSTRY MEETING OF THE RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST MAY 17, 2002

NAME AFFILIATION

TONY PIETRANGELO

NUCLEAR ENERGY INSTITUTE

BIFF BRADLEY

NUCLEAR ENERGY INSTITUTE

NUCLEAR ENERGY INSTITUTE

ENERGY NORTHWEST/BWROG

DONALD HOFFMAN EXCEL SERVICES
JIM ANDRACHEK WESTINGHOUSE/WOG

MIKE KITLAN DUKE ENERGY
R. J. SCHOMAKER FRAMATECH ANP
DREW RICHARDS STP
WAYNE HARRISON STP

**RICK HILL** 

RAY SCHNEIDER WESTINGHOUSE/CEOG

GABE SALAMON
BILL BECKNER
BOB DENNIG
BOB TJADER
CRAIG HARBUCK
NICK SALTOS
MILLARD WOHL

WESTINGHOUSE/CEOG
WESTINGHOUSE/CEOG
WESTINGHOUSE/CEOG
WESTINGHOUSE/CEOG
WESTINGHOUSE/CEOG
WESTINGHOUSE/CEOG
WESTINGHOUSE/CEOG
NRC/NRR/DRIP/RORP
NRC/NRR/DRIP/RORP
NRC/NRR/DSSA/SPSB

MILLARD WOHL
EILEEN MCKENNA
ROY MATHEW
ALAN KURITZKY
NRC/NRR/DRM/IIPB
NRC/RES/DRAA/PRAB

AMARJIT SINGH NRC/RES

# **AGENDA**

## TSB/NEI RITSTF Meeting May 17, 2002

Status of Initiatives

Initiative 3, LCO 3.0.4 & SR 3.0.4 (Mode Restraint) Flexibility TSTF-359 R7 and SER for CLIIP

Initiative 1, End States
BWR SER preparation
TSTF submittal

Initiative 6, LCO 3.0.3 Actions and Completion Times

Initiative 7, Non-TS Support System Operability Impact on TS System TSTF submittal

Initiative 8a, Remove/Relocate non-safety & non-risk significant systems from TS

Initiative 5, STI Evaluation Methodology

Initiative 4b, RI AOTs with CRMP
Industry proposed approaches, pilots
NRC feedback

- Schedule Next Meeting
- Closing Comments