

**RISK INFORMED TECHNICAL SPECIFICATION TASK FORCE (RITSTF)  
RISK MANAGEMENT TECHNICAL SPECIFICATION INITIATIVE STATUS**

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
1	Technical Specification Required Actions Preferred End States	<ul style="list-style-type: none"> <li>TSTF 422 submitted to NRC on June 6, 2002.</li> <li>TSTF developing list of needed revisions based on NRC comments.</li> </ul>	<ul style="list-style-type: none"> <li>The NRC has expressed concerns that TSTF-422 allows staying in the preferred end state when there is a loss of safety function as defined by the LCO. The NRC will complete their review and issue an SE after this issue is resolved. Westinghouse, the TSTF, and the RITSTF are discussing possible revisions to address the NRC's concerns.</li> <li>TSTF developed a list of needed changes to TSTF-422 based on NRC comments. List created and discussed at the 12/18/02 RITSTF meeting. Revision of TSTF to be submitted to NRC by 1/21/03.</li> <li>The BWROG SE was issued 9/27/02.</li> <li>BWROG topical A version to be issued by 12/24/02.</li> <li>TSTF 423 being developed and plan to submit to NRC by 2/24/03.</li> </ul>	<p>CEOG - TSTF 422 R0</p> <p>BWROG - TSTF 423 R0 <i>(Being Developed)</i></p> <p>BWOG - TSTF 431 R0 <i>(Not created)</i></p> <p>WOG - TSTF 432 R0 <i>(Not created)</i></p>

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2	Missed Surveillances SR 3.0.3	<ul style="list-style-type: none"> <li>• TSTF 358, R6, has been approved and published for CLIP adoption.</li> </ul>	<ul style="list-style-type: none"> <li>• Initiative Complete</li> </ul>	TSTF 358 R6
3	Increase Flexibility in Mode Restraints LCO 3.0.4	<ul style="list-style-type: none"> <li>• TSTF 359 R8 submitted to NRC on 12/4/02.</li> </ul>	<ul style="list-style-type: none"> <li>• TSTF provided TSTF 359 R7 to NRC with changes to match the final completed Safety Evaluation on 7/10/02.</li> <li>• CLIP FRN on 8/2/02.</li> <li>• NRC received 4 sets of comments. NRC currently resolving the comments and plan to finalize the CLIP Notice of Availability in 10/2002.</li> <li>• TSTF-359, Rev. 8 submitted on 12/4/02. Notice of Availability expected early February 2003.</li> </ul>	TSTF 359 R8

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4a	Individual Risk Informed Allowed Outage Times (AOTs)	<ul style="list-style-type: none"> <li>• Individual Owners Groups (OGs) and plants are pursuing individual Risk Informed AOTs through Topicals and license amendments.</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing</li> </ul>	Various

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4b	Risk Informed AOTs With Configuration Risk Management Program or Maintenance Rule Backstop	<ul style="list-style-type: none"> <li>TSTF-424 provided to NEI on 12/3/02. NEI to submit to NRC.</li> </ul>	<ul style="list-style-type: none"> <li>NRC provided comments on the NEI White Paper.</li> <li>RITSTF provided an Integration Plan with schedules 8/15/02.</li> <li>RITSTF provided a draft Risk Management Guidance Document 10/31/02.</li> <li>RITSTF has coordinated with CEOG and the other pilot programs to ensure a single coordinated methodology and process for Initiative 4b. This single process and overall pilot for Initiative 4b will be supported by the multiple individual plant and Owners Group pilot plants.</li> <li>RITSTF has coordinated with South Texas Project (STP) to integrate the generic Initiative 4b and the STP approach.</li> <li>The STP application will be provided as a letter of intent by 1/31/03.</li> <li>NEI will provide TSTF 424 and the Draft Risk Management Guide to the NRC by 1/21/03.</li> </ul>	TSTF 424 R0

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5a	Relocate Surveillance Requirements Not Related to Safety	<ul style="list-style-type: none"> <li>• Deterministic portion of Initiative 5 transferred to TSTF responsibility.</li> </ul>	<ul style="list-style-type: none"> <li>• TSTF reviewing candidate SRs to be relocated.</li> <li>• TSTF will provide a TSTF to the NRC by 6/30/03.</li> </ul>	None assigned
5b	Relocate Surveillance Test Intervals to Licensee Control	<ul style="list-style-type: none"> <li>• NRC provided comments on the RITSTF White Paper.</li> </ul>	<ul style="list-style-type: none"> <li>• NRC provided comments on the RITSTF White Paper. BWROG developed a Guidance Document from the White Paper and NRC and Industry comments and provided to RITSTF.</li> <li>• BWROG will provide a revised Guidance Document to the RISTF for review 12/20/02.</li> <li>• BWROG will identify a pilot plant in 2003 and develop a draft Traveler based on the application of the methodology. BWROG will attach the Guidance Document to the TSTF.</li> <li>• Draft Traveler of just the marked up Technical Specifications to be developed by 2/15/03 for RITSTF/TSTF review.</li> <li>• RITSTF/BWROG/Pilot Plant will be applying the methodology and interfacing with the NRC on the issues in 2003.</li> <li>• TSTF to be submitted to NRC 12/15/03.</li> </ul>	TSTF 425 R0 <i>(Not created)</i>

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6a	Modify LCO 3.0.3 Actions and Timing 1 hour - 24 hours	<ul style="list-style-type: none"> <li>• On hold.</li> </ul>	<ul style="list-style-type: none"> <li>• On hold for resolution of Initiative 6b and 6c to determine if Initiative 6a is required.</li> </ul>	None assigned
6b	Provide Conditions in the LCOs for Those Levels of Degradation Where No Condition Currently Exists to Preclude Entry Into LCO 3.0.3	<ul style="list-style-type: none"> <li>• NRC drafting Safety Evaluation.</li> </ul>	<ul style="list-style-type: none"> <li>• CEOG and RITSTF responded to RAIs on 2/27/02.</li> <li>• NRC is in the process of writing the SE and should have it completed by 11/15/02.</li> <li>• CEOG provided responses to NRC.</li> <li>• CEOG to provide a list of ISTS changes and justification to TSTF after NRC completes Safety Evaluation in 3/03.</li> <li>• TSTF to prepare and submit TSTF-426 to NRC after receipt of NRC SE and receipt of information from CEOG. Current schedule for TSTF to NRC is 5/31/03.</li> </ul>	TSTF 426 R0 <i>(Not created)</i>

### RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
6c	Provide Specific Times in the LCO For Those Conditions That Require Entry Into LCO 3.0.3 Immediately	<ul style="list-style-type: none"> <li>• NRC drafting Safety Evaluation.</li> </ul>	<ul style="list-style-type: none"> <li>• CEOG and RITSTF responded to RAIs on 2/27/02.</li> <li>• NRC is in the process of writing the SE and should have it completed by 11/15/02.</li> <li>• NRC has questions on some of the numbers. CEOG will provide responses to NRC by 10/15/02.</li> <li>• CEOG to provide a list of ISTS changes and justification to TSTF after NRC completes Safety Evaluation in 3/03.</li> <li>• TSTF to prepare and submit TSTF-426 to NRC after receipt of NRC SE and receipt of information from CEOG. Current schedule for TSTF to NRC is 5/31/03.</li> </ul>	TSTF 426 R0 <i>(Not created)</i>

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7a	Impact of Non Technical Specification Design Features on Operability Requirements - Barriers	<ul style="list-style-type: none"> <li>• RITSTF provided a White Paper to the NRC. NRC initial comments indicate no major issues and RITSTF can proceed.</li> <li>• Subsequent NRC questions/comments indicates some concern with the approach.</li> </ul>	<ul style="list-style-type: none"> <li>• RITSTF/TSTF discussed TSTF 372 R2 and Initiative 7 at the end of the 6/4/02 TSTF meeting.</li> <li>• NEI provided risk input for TSTF 372 to TSTF on 6/30/02.</li> <li>• RITSTF/TSTF developed a revision to TSTF 372 to address the NRC concerns and a draft was provided to the NRC on 8/7/02.</li> <li>• NRC provided their comments and recommended changes in a letter dated 12/13/02.</li> <li>• RITSTF/TSTF evaluating NRC position and will discuss with NRC at the 12/19/02 RITSTF/NRC meeting.</li> <li>• RITSTF provide draft Rev. 3 of TSTF-372 that addresses the NRC comments of 12/13/02 letter by 1/03/03.</li> <li>• Draft Traveler for Initiative 7a drafted for discussion with the RITSTF on 12/18/02 and NRC 12/19/02. Plan is to submit to NRC by 2/6/03.</li> </ul>	<p>TSTF 372 R2</p> <p>TSTF 427 R0 <i>(Being drafted)</i></p>

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INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
7b	Impact of Non TS Design Features on Operability Requirements – All other SSCs not in Technical Specifications		<ul style="list-style-type: none"> <li>• RITSTF will develop a White Paper to outline the process to address this scope of SSCs by 5/1/03.</li> <li>• RITSTF/TSTF will work with the NRC on a risk informed revision of GL 91-18 and integrate the Initiatives.</li> <li>• RITSTF/TSTF will develop a TSTF and submit to NRC by 6/30/03.</li> </ul>	None assigned
8a	Remove or Relocate Systems LCOs That Do Not Meet the 4 Criterion of 10 CFR 50.36 From Technical Specifications	<ul style="list-style-type: none"> <li>• A White Paper on the application of the 10 CFR 50.36 criteria is being developed.</li> </ul>	<ul style="list-style-type: none"> <li>• NEI 00-04 is being reviewed and will serve as the basis for Criterion 4 application.</li> <li>• RITSTF will develop a White Paper to outline the guidance and methodology based on NEI 00-04 for the application of the four criteria of 10 CFR 50.36 and a list of the systems identified for relocation. RITSTF working on the schedule – current plans are second quarter 2003.</li> </ul>	None assigned
8b	Modify 50.36 Rule to Permit Removal or Relocation of Non Risk Significant Systems out of Technical Specifications	<ul style="list-style-type: none"> <li>• Requires Rulemaking</li> </ul>	<ul style="list-style-type: none"> <li>• RITSTF looking at coordinating Initiative 8b with longer term initiatives given the requirements for rulemaking.</li> </ul>	Not applicable

BWOG - Active in Initiatives 1, 4 and 7

CEOG - Active in Initiatives 1, 4, 5 and 6

BWROG - Active in Initiatives 1, 4, 5 and 8

WOG - Active in Initiatives 1, 4, and 5