UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 7, 2003

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

SUBJECT: MARCH 5, 2003: 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 March 5, 2003.

Sincerely,

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. Presentation Vugraphs on "Flexible AOT and the HPSI Pilot."
5. Presentation Vugraphs on "STP Risk-Informed Technical Specifications."
6. RITSTF Initiative Status

cc w/encl: See attached page

March 7, 2003

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

SUBJECT: MARCH 5, 2003: 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 March 5, 2003.

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. Presentation Vugraphs on "Flexible AOT and the HPSI Pilot."
5. Presentation Vugraphs on "STP Risk-Informed Technical Specifications."
6. RITSTF Initiative Status

cc w/encl: See attached page

DISTRIBUTION:
See next page

ADAMS ACCESSION NUMBER:
DOCUMENT NAME: G:\RORP\TSS\TJADER\RITSTF-MTGsum-3-5-03.wpd

OFFICE	TSS:RORP:DRIP	SC:TSS:RORP:DRIP		
NAME	TRTjader	RLDennig		
DATE	03/7/2003	03/7/2003		

OFFICIAL RECORD COPY

DISTRIBUTION:
ADAMS
PUBLIC
TSS R/F
TSS Staff
DMatthews/FGillespie (RidsNrrDrip)
WDBeckner (RidsNrrDripRorp)
GMHolahan (RidsNrrDssa)
RJBarrett (RidsNrrSpsb)
JZwolinski (RidsNrrDlpm)
JNHannon (RidsNrrDssaSplb)
TRQuay (RidsNrrDipmlqmb)
OGC (RidsOgcRp)
ACRS/ACNW (RidsAcrsAcnwMailCenter)
MLWohl (MLW1)
NSaltos (NTS)
MRJohnson (MRJ1)
WScott (WES)
GSShukla (GSS)
FMReinhart (FMR)
AWMarkley (AWM)
SLMagruder (SLM1)
RFDudley (RFD)
DFThatcher (DFT)
MACaruso (MAC)
MLScott (MLS3)
EMMcKenna (EMM)
MACunningham (MAC3)
ASKuritzky (ASK1)
MTMarkley (MTM)
SDAlexander (SDA)
MDrouin (MXD)
MCThadani (MCT)
TAReed (TAR)
SWest (KSW)

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

Mr. Jerry Andre
Westinghouse Electric Company

SUMMARY OF THE MARCH 5, 2003, 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 March 5, 2003, from 8:30 a.m. to 11:30 a.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of discussions of the seven active RITSTF initiatives. Industry representatives gave presentations on the Combustion Engineering Owners Group (CEOG) and the South Texas Project (STP) pilots for initiative 4b. Alan Hackerott provided information on the CEOG pilot (Enclosure 4), and Wayne Harrison provided information on the STP pilot (Enclosure 5). The RITSTF provided a summary of the status of the initiatives (Enclosure 6). Following is a brief description of the status of the initiatives in the order in which they were discussed.

Initiative 4b, Risk Informed CTs/AOTs: The NEI RITSTF provided a draft risk management guidance document and the CEOG single system pilot proposal, TSTF-424, on January 21, 2003. The RITSTF will submit the whole-plant STP pilot proposal in March 2003. The NRC staff will begin organizing and commencing the review process for the submittals.

Initiative 3, TSTF-359, Modification of mode restraint requirements of LCO 3.0.4 & SR 3.0.4: The first CLIIP Federal Register Notice was published on August 2, 2002, requesting public comments. Public comments have been received and are being addressed. The staff will publish the final CLIIP Federal Register Notice announcing availability as soon as all issues are resolved, which is expected to be completed in late March 2003. NEI wil be conducting a workshop in the near future for operators and PRA practioners on implementation of initiatives 2 and 3.

Initiative 7, Non-TS support system impact on TS operability determinations: The RITSTF plans to submit TSTF-372, Revision 4, on snubber inoperability, in April 2003. The RITSTF submitted the Initiative 7 TSTF-427 addressing barrier inoperability, on March 4, 2003. The RITSTF will assist the NRC in revising GL 91-18 via a future public workshop.

Initiative 1, TS Actions End States Modifications: The BWR topical SER was issued on September 27, 2002. The BWR TSTF-423 is being developed and will be submitted by the end of June, 2003. The RITSTF submitted a revision to CE TSTF-422 on January 24, 2003, expanding its applicability from a loss of single train to address a loss of LCO function; NRC staff review will commence in the near future.

Initiative 6, Modification of LCO 3.0.3 Actions and Completion Times: A final response to NRC RAIs will be submitted in May 2003. The staff is preparing an SER on the CEOG Initiative 6b/c submittal. The RITSTF plans to submit a comprehensive TSTF-426 in September 2003.

Initiative 5, Relocation of non-safety SRs (5a) and relocation of all SR frequency requirements (5b) out of TS: The RITSTF will develop a Guidance Document on an Initiative 5b methodology and provide it to the NRC in May 2003. The TSS staff plans to meet with OGC in the next month to discuss the initiative 5b concept and ensure they have no legal objection. Limerick has volunteered to be the pilot plant to test the proposed program and procedures. After NRC

review and acceptance of the Guidance Document, and the results of the pilot plant application are evaluated, the RITSTF will prepare and submit TSTF-425 by December 15, 2003. The RITSTF will submit a TSTF to relocate some SRs under Initiative 5a by September 30, 2003.

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 RITSTF will interface with the NRC in the development of guidance and a methodology, based on NEI 00-04, for the application of the four criteria of 10 CFR 50.36. The RITSTF will develop a white paper on Initiative 8a, outlining the guidance and methodology for implementation in the third quarter of CY 2003.

The next NRC TSS/NEI RITSTF meeting is scheduled for May 15, 2003, at the NRC Headquarters in Rockville, MD.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
MARCH 5, 2003

NAME	AFFILIATION
TONY PIETRANGELO	NUCLEAR ENERGY INSTITUTE
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DONALD HOFFMAN	EXCEL SERVICES
ALAN HACKEROTT	OPPD
FRANK RAHN	EPRI
JIM ANDRACHEK	WESTINGHOUSE/WOG
MIKE KITLAN	DUKE ENERGY
NOEL CLARKSON	DUKE ENERGY
JACK STRINGFELLOW	SOUTHERN NUCLEAR OPERATING COMPANY
J. E. DUSTY RHOADS	ENERGY NORTHWEST/BWROG
WAYNE HARRISON	STP NOC
DREW RICHARDS	STP NOC
BOB SCHOMAKER	FRAMATOME-ANP
RAY SCHNEIDER	WESTINGHOUSE PSA
BOB DENNIG	NRC/NRR/DRIP/RORP/TSS
BOB TJADER	NRC/NRR/DRIP/RORP/TSS
KERRI KAVANAGH	NRC/NRR/DRIP/RORP/TSS
PETER HEARN	NRC/NRR/DRIP/RORP/TSS
CRAIG HARBUCK	NRC/NRR/DRIP/RORP/TSS
TOMMY LE	NRC/NRR/DRIP/RORP/TSS
CARL SCHULTEN	NRC/NRR/DRIP/RORP/TSS
NICK SALTOS	NRC/NRR/DSSA/SPSB
MILLARD WOHL	NRC/NRR/DSSA/SPSB
MARK REINHART	NRC/NRR/DSSA/SPSB
MARK CARUSO	NRC/NRR/DSSA/SPSB
STEPHEN ALEXANDER	NRC/NRR/DIPM/IQMB
STU MAGRUDER	NRC/NRR/DRIP/RPRP
MARY DROUIN	NRC/RES/DRAA/PRAB
STEVE WEST	NRC/NRR/RPRP/RGEB
TIM REED	NRC/NRR/RPRP/RGEB
MOHAN THADANI	NRC/NRR/DLPM/LPD1

Enclosure 2

AGENDA

TSB/NEI RITSTF Meeting
March 5, 2003 from 8:30 AM to 4:00 PM, in O-13B4

- Status of Initiatives
  - Initiative 4b, RI Configuration Management CTs/AOTs
    Integration Plan and Guidance Document
    CEOG TSTF-424
    Industry proposed approaches, pilot presentations
- Public Questions and Discussion
  - Initiative 3, LCO 3.0.4 & SR 3.0.4 (Mode Restraint) Flexibility
    Final FRN
  - Initiative 7, Non-TS Support System Inoperability Impact on TS System
    TSTF-372
    TSTF-427
  - Initiative 1, End States
    CEOG TSTF-422
    BWROG TSTF-423
  - Initiative 6, LCO 3.0.3 Actions and Completion Times
    CEOG final submittal and staff SER
- Public Questions and Discussion
  - Initiative 5, STI Evaluation Methodology
  - Initiative 8a, Remove/Relocate non-safety & non-risk significant systems from TS
- Public Questions and Discussion
- Schedule Next Meeting
- Closing Comments

Enclosure 3

Flexible AOT and the HPSI Pilot

March 2003

1

Background

- RITS Changes per current RGs in progress since 1995
  - Emphasis on single AOT extensions
- Joint NRC/Industry Global Risk Informed Initiative began in 1998
  - initiatives designed to risk inform the ISTS
  - goal to allow plant to manage risk and avert unnecessary shutdowns
  - Further meld maintenance rule philosophy, and PSA with TS

2

Enclosure 4

The Flexible AOT is a Logical Adjunct to the Maintenance Rule

- The flexible AOT concept was proposed in NRC sponsored meetings in 1998 as initiative 4B to the global risk informed TS revisions
- Flexible AOTs were desired to let Maintenance Rule Control plant risk and Maintenance:
  - Inflexibility of prescriptive TS structure can discourage and complicate some maintenance
    - Multiple partial repairs
    - parallel vs. series maintenance
    - total system inoperability encouraged
  - TS prescriptive actions can be risk adverse
    - transition risk -power operation trade off
  - Establish consistency with Regulations i.e., (Maintenance Rule a(4))
  - Ties maintenance decisions to plant risk impact

FEATURES of the FLEXIBLE TS AOT

- Front Stop established by current TS
- Risk assessment managed by Risk-Informed Technical Specifications Risk Management Guide
  - tracked
  - limited to small risk increments
  - robust a(4) process with shutdown decision process
- Backstop Time Limit provided for return of system to Operability regardless of low risk level.
- Accumulated use of backstop AOT monitored and compared to RG 1.174 guidelines

Why a Single System Pilot?

- Example system TS Pilot was selected to incrementally introduce and explore the concept of flexible AOTs
- Flexibility in TSs requires study of programmatic issues
  - Single, well-understood system provides a means to explore impact of change in detail

OK then, Why HPSI?

- HPSI is a risk important and challenging system.
- However,
  - the HPSI System has several low risk states which may challenge operability without significantly impacting risk.
    - degraded pump performance
    - single injection valve inoperability
  - HPSI has limited interaction with external event scenarios
  - risk can be well quantified
  - TS may be implemented by all CE designed PWRs with a technically adequate PRA
- HPSI provides a focused example to test guidance document.

What is in the Report?

- The HPSI TS AOT Pilot Report Includes
  - Description of the proposed TS change
  - Basis and need for request
  - Potential risk impacts over a group of plants with varying HPSI system designs
    - comparison of partial inoperabilities
      - valve maintenance examples
      - support system examples
      - includes impact of simultaneous maintenance activities
    - Includes LERF estimate and insights
    - Includes insights associated with fire, seismic and transition risks.

The Role of the Guidance Document

- Submitted with Risk-Informed Technical Specifications Risk Management Guide
  - Identifies key elements of the process
  - recommends risk targets
  - recommends tracking alternatives
- The guidance is appropriate for single or multiple system implementation
- Details to be resolved on implementation and review

Closure

- HPSI Pilot helping to resolve industry issues associated with implementation of the Flexible AOT and the associated guidance document
- The Pilot is a building block in a process to extend flexible AOTs to a wider range of systems.
- Pilot provides a critical step at consistently integrating Maintenance Rule practices and the TS.

STP Risk-Informed Technical Specifications

Benefits of RITS

- Focus on what is really important to safety
  - Eliminates many opportunities for TS 3.0.3
  - Would virtually eliminate NOEDs for the SSCs covered by the change
- Complements Maintenance Rule
  - Applies same Configuration Risk Management Program
- Facilitates on-line maintenance

2

STP Risk-Informed TS

- WOG Lead Plant
  - Result of NRC-Industry initiative
  - STP model will provide opportunity for industry and NRC to develop an acceptable generic format and approach

3

Submittal Schedule

- Submit "Letter of Intent" with proposed changes in early 2003
  - Just a BIG meeting agenda
  - Identify and resolve policy issues
  - Propose STP as a pilot, specifically for DG-1122
  - Provides opportunity for industry involvement
- Meet with NRC to resolve major issues
- Formal License Amendment submittal after comments resolved
- Final approval in mid to late 2004

4

STP RITS Model

- Apply the Configuration Risk Management Program to extend allowed outage times for selected LCO
- Addition of TS 3.13
  - Will be called out by the individual TS to which it may be applied
  - Allows the application of CRMP as an alternative to the existing allowed outage times ("frontstop" time)
  - Incorporates a not-to-exceed "backstop" time of 30 days

5

STP General Concept

- **A broadly applicable TS 3.13 based on incremental risk thresholds determined in the CRMP**
- **Consistent with "Risk Management Technical Specifications Risk Management Guide"**

6

Draft TS 3.13

RISK MANAGEMENT

ALLOWED OUTAGE TIME DETERMINATIONS

LIMITING CONDITION FOR OPERATION

3 13 1 When referred to this specification, equipment that has been removed from service or declared inoperable shall be evaluated for its impact on plant risk and allowed outage times determined accordingly

APPLICABILITY. As required by the referencing specification

ACTION.

Determine that the configuration is acceptable for Completion Time extension beyond the [Front Stop AOT].

AND

Determine that the configuration is acceptable for continued operation beyond the [Front Stop AOT] whenever configuration changes occur that may affect plant risk.

AND

Restore required inoperable [subsystem, component] to OPERABLE status within the Acceptable Allowed Outage Time Extension or 30 days, whichever is shorter

Note The 30 day limitation may be applied individually to each specification for which Specification 3 13 1 has been entered

OR

Take the ACTION required in the referencing specification for required action or completion time not met

SURVEILLANCE REQUIREMENTS

4 13 1 As required by the referencing specification

7

Sample Specification

PLANT SYSTEMS

3/4.7.4 ESSENTIAL COOLING WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3 7 4 At least three independent essential cooling water loops shall be OPERABLE.

APPLICABILITY. MODES 1, 2, 3, and 4

ACTION

a With only two essential cooling water loops OPERABLE, within 7 days restore at least three loops to OPERABLE status or apply the requirements of Specification 3.13, OR be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

b With two or more essential cooling water loops inoperable, within 12 hours restore at least two loops to OPERABLE status or apply the requirements of Specification 3.13, OR be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours

8

Implementation

- Option to use the existing TS allowed outage time for routine plant activities ("front-stop" time)
  - Also provides sufficient time to apply the CRMP
- Once a component has exceeded its front-stop time, the CRMP must be applied to determine the allowed outage time for configuration changes until no components are in actions beyond their frontstop time.
  - Could be more restrictive than existing frontstop times

9

Specifications Affected

- Selected instrumentation of TS 3.3
- Code safety valves
- Pressurizer PORVs
- Accumulators
- ECCS
- RHR
- RWST
- RCB Purge
- Containment Spray
- Containment Fan Coolers
- AFW
- MSIVs
- Atmospheric Steam Relief
- Component Cooling Water
- Essential Cooling Water
- CRE HVAC
- FHB HVAC
- Essential Chilled Water
- SDGs and Off-site circuits
- Batteries
- ESF Buses

10

Comparison to "Standard RITS"

- TS 3.13 format is different, but the application is the same
- Applies in MODE 1-4 for SSCs modeled in the PRA
- Would apply to conditions where TS 3.0.3 currently applies.
- References the Implementation Guidelines
  - Takes exception to proscription against allowing loss of function

11

DG-1122 Pilot

- Submittal is proposed as a DG-1122 pilot application
- Pilot application requires substantial effort
  - Complete response to Peer Review
  - Detailed information will not be ready at the time of the first submittal
- STP PRA has undergone extensive review in the past
  - 7 Licensing applications since 1994

12

Enclosure 6

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	• TSTF-422 submitted to NRC on January 24, 2003. • TSTF-423 to be submitted to NRC on 6/03.	• 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. • 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. • TSTF-422, Rev. 1 was submitted to the NRC on 1/24/03. • The BWROG SE was issued 9/27/02. • BWROG Topical A version was issued in 2/03. • TSTF-423 is being developed based on the approved Topical and is scheduled to be submitted to the NRC 6/03.	CEOG - TSTF-422 R0 BWROG - TSTF-423 R0 *(Being Developed)* BWOG - TSTF-431 R0 *(Not created)* WOG - TSTF-432 R0 *(Not created)*

NEI RITSTF

NEI Biff Bradley, 202 739-8083
Tony Pietrangelo, 202 739-8081
EXCEL Don Hoffman, 301 984-4400
EPRI Frank Rahn, 650 855-2037
John Gaertner, 704 547-6169

WOG Jack Stringfellow, Southern Nuclear, 205 992-7037
Jim Andrachek, Westinghouse, 412 374-5018
Jerry Andre, Westinghouse, 412 374-4723
BWOG Noel Clarkson, Duke, 864 885-3077
R. Schomaker, Framatome, 434 832-2917
Mike Kitlan, Duke, 704 373-8348

CEOG Alan Hackerott, OPPD, 402 533-7276
Gary Chung, SCE, 949 368-9431
Ray Schneider, CE, 860 731-6461
BWROG Rick Hill, GE, 408 925-5388
Dusty Rhoads, Energy Northwest, 509 377-4298
Don McCamy, TVA 256 729-4595

03/05/2003

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
2	Missed Surveillances SR 3.0.3	• TSTF-358, R6, has been approved and published for CLIIP adoption.	• Initiative Complete	TSTF-358 R6
3	Increase Flexibility in Mode Restraints LCO 3.0.4	• TSTF-359 R8 submitted to NRC on 12/4/02.	• TSTF provided TSTF-359 R7 to NRC with changes to match the final completed Safety Evaluation on 7/10/02. • CLIIP FRN on 8/2/02. • NRC received 4 sets of comments. NRC currently resolving the comments and plan to finalize the CLIIP Notice of Availability in 10/2002. • TSTF-359, Rev. 8 submitted on 12/4/02. Notice of Availability expected late March 2003.	TSTF-359 R8
4a	Individual Risk Informed Allowed Outage Times (AOTs)	• Individual Owners Groups (OGs) and plants are pursuing individual Risk Informed AOTs through Topicals and license amendments.	• Ongoing	Various

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
4b	Risk Informed AOTs With Configuration Risk Management Program or Maintenance Rule Backstop	• TSTF-424 and the Draft Risk Management Guide were provided to the NRC on 1/21/03.	• NRC provided comments on the NEI White Paper. • RITSTF provided an Integration Plan with schedules 8/15/02. • RITSTF provided a draft Risk Management Guidance Document 10/31/02. • 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. • RITSTF has coordinated with South Texas Project (STP) to integrate the generic Initiative 4b and the STP approach. • TSTF-424 and the Draft Risk Management Guide were provided to the NRC on 1/21/03. • The STP application will be provided as a letter of intent by 3/03. • NRC is putting together a Task Action Plan to determine action and schedule for review.	TSTF-424 R0

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
4b	Risk Informed AOTs With Configuration Risk Management Program or Maintenance Rule Backstop	TSTF-424 and the Draft Risk Management Guide were provided to the NRC on 1/21/03.	• NRC plan is to get initial responses to Industry in 5/03	
5a	Relocate Surveillance Requirements Not Related to Safety	• Deterministic portion of Initiative 5 transferred to TSTF responsibility.	• TSTF reviewing candidate SRs to be relocated. • TSTF will provide a TSTF to the NRC by 9/30/03.	None assigned

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
5b	Relocate Surveillance Test Intervals to Licensee Control	• RITSTF/BWROG/Pilot Plant will be applying the methodology and interfacing with the NRC on the issues in 2003.	• 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. • BWROG provided a revised Guidance Document to the RITSTF for review 3/4/03. • RITSTF to provide comments to the BWROG by 3/25/03. • Draft Traveler of just the marked up Technical Specifications to be developed by 4/15/03 for RITSTF/TSTF review. • RITSTF to provide the Draft Guidance Document and the draft TSTF of the marked up Technical Specifications to NRC by 5/03 • BWROG has identified a pilot plant and will develop a draft Traveler based on the application of the methodology. BWROG will attach the Guidance Document to the TSTF. • TSTF-425 to be submitted to NRC 12/15/03.	TSTF-425 R0 *(Not created)*

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
6a	Modify LCO 3.0.3 Actions and Timing 1 hour - 24 hours	• On hold.	• On hold for resolution of Initiative 6b and 6c to determine if Initiative 6a is required.	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	• NRC drafting Safety Evaluation.	• CEOG to provide revised version to address the RAIs to NRC in 5/03. • NRC will finalize the SE based on the CE responses and should have it completed by 7/03. • CEOG to provide a list of ISTS changes and justification to TSTF after NRC completes Safety Evaluation in 7/03. • 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 9/03.	TSTF-426 R0 *(Not created)*

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	• NRC drafting Safety Evaluation.	• CEOG to provide revised version to address the RAIs to NRC in 5/03. • NRC will finalize the SE based on the CE responses and should have it completed by 7/03. • CEOG to provide a list of ISTS changes and justification to TSTF after NRC completes Safety Evaluation in 7/03. • 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 9/03..	TSTF-426 R0 *(Not created)*

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
7a	Impact of Non Technical Specification Design Features on Operability Requirements - Barriers	• TSTF-427 transmitted to NRC on 3/4/03. • Draft Revision 4 of TSTF-372 in Industry review. Submit revision to NRC in 4/03.	• RITSTF provided draft Rev. 3 of TSTF-372 that addresses the NRC comments of 12/13/02 letter on 1/13/03. • On January 30, NRC stated that they had additional comments on TSTF-372. • On a conference call on February 13, the NRC stated they still had concerns regarding snubbers affecting more than one train of a system and requested changes. TSTF to develop revision incorporating NRC requested changes for Industry discussion. • Draft Revision 4 of TSTF-372 created. NRC reviewed and agreed it addressed their comments. Draft being reviewed by TSTF, RITSTF, and Snubbers Users Group. Plan is to submit revision to NRC in 4/03. • Draft Traveler for Initiative 7a (TSTF-427) drafted for discussion with the RITSTF on 12/18/02 and NRC 12/19/02. • TSTF-427 transmitted to NRC on 3/4/03.	TSTF-372 R2 TSTF-427 R0

RITSTF INITIATIVE STATUS

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		• RITSTF will develop a White Paper to outline the process to address this scope of SSCs by 5/1/03. . • RITSTF/TSTF will work with the NRC on a risk informed revision of GL 91-18 and integrate the Initiatives. • RITSTF/TSTF will develop a TSTF and submit to NRC by 6/30/03.	None assigned
8a	Remove or Relocate Systems LCOs That Do Not Meet the 4 Criterion of 10 CFR 50.36 From Technical Specifications	• A White Paper on the application of the 10 CFR 50.36 criteria is being developed.	• NEI 00-04 is being reviewed and will serve as the basis for Criterion 4 application. • 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 third quarter 2003.	None assigned

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
8b	Modify 50.36 Rule to Permit Removal or Relocation of Non Risk Significant Systems out of Technical Specifications	• Requires Rulemaking	• RITSTF looking at coordinating Initiative 8b with longer term initiatives given the requirements for rulemaking.	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