



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 29, 2003

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

SUBJECT: MAY 15, 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 May 15, 2003.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerri Kavanagh", is positioned above the typed name.

Kerri Kavanagh, Acting 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
5. Initial Staff Impressions of RMTS Risk Management Guide
6. Presentation Vugraphs on "BWROG Initiative 5b Method"

cc w/encl: See attached page

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NAME	TRTjader <i>TR</i>	KAKavanagh <i>KAK</i>		
DATE	05/29/2003	05/29/2003		

OFFICIAL RECORD COPY

Mr. Biff Bradley

cc via e-mail:

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Mr. Sam Chien
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Mr. Gary Chung
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PSEG Nuclear LLC

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Westinghouse Electric Company

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TSS R/F

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TRQuay (RidsNrrDipmlehb)

OGC (RidsOgcRp)

ACRS/ACNW (RidsAcrsAcnwMailCenter)

MLWohl (MLW1)

NSaltos (NTS)

WScott (WES)

GSShukla (GSS)

SPWall (SPW)

WDRackley (WDR)

FMReinhart (FMR)

CKDoutt (CKD)

AWMarkley (AWM)

SLMagruder (SLM1)

RFDudley (RFD)

DFTthatcher (DFT)

MACaruso (MAC)

MLScott (MLS3)

EMMcKenna (EMM)

MACunningham (MAC3)

ASKuritzky (ASK1)

MTMarkley (MTM)

WEScott (WES)

SDAlexander (SDA)

MDrouin (MXD)

MCThadani (MCT)

TAReed (TAR)

SWest (KSW)

SUMMARY OF THE MAY 15, 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 May 15, 2003, from 8:30 a.m. to 10:00 a.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of discussions of the six active RITSTF initiatives. The RITSTF provided a summary of the status of the initiatives (Enclosure 4). 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 & SR 3.0.4:

The staff published the final CLIP Federal Register Notice announcing availability of this change on April 4, 2003. NEI will be conducting a workshop in Boston, on July 17, 2003, for operators and PRA practitioners on implementation of initiatives 2 and 3; the staff has been invited to attend.

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 support of the DG-1122 Office of Research effort on PRA quality and this initiative. The NRC staff has commenced the review process for the RMTS Risk Management Guide and TSTF-424 submittals. The staff provided (Enclosure 5) initial impressions of the RMTS Risk Management Guide. The RITSTF would like to meet with the staff to discuss potential RAs as soon as they are available.

Initiative 7, Non-TS support system impact on TS operability determinations: The RITSTF plans to delay submittal of TSTF-372, Revision 4, on snubber inoperability due to issues with the staff approach to multi-train inoperabilities. TSTF-427, addressing hazard barrier inoperability, is currently under review by the staff.

Initiative 1, TS Actions End States Modifications: The BWR topical SER was issued on September 27, 2002. The BWR TSTF-423 is being developed. 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 very near future.

Initiative 6, Modification of LCO 3.0.3 Actions and Completion Times: 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 is developing a Guidance Document on an Initiative 5b methodology. The RITSTF presented a briefing on the "BWROG Initiative 5b Method," (Enclosure 6). The staff has determined that this proposal may conflict with the requirements of 10 CFR 50.36. Limerick and Peach Bottom have volunteered to be pilot plants to test the proposed program and procedures.

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. NEI noted that the priority of Initiative 8b, on rule making, may need to be increased if an appropriate methodology cannot be found for Initiative 5b, or if other problems arise.

The next NRC TSS/NEI RITSTF meeting will be scheduled for either July 16 or July 18, 2003, in Boston. The NRC is hosting an Operability Workshop, to update Generic Letter 91-18, on August 14, 2003, at the NRC Headquarters in Rockville, MD.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
MAY 15, 2003

<u>NAME</u>	<u>AFFILIATION</u>
TONY PIETRANGELO	NUCLEAR ENERGY INSTITUTE
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
BRIAN MANN	TSTF/EXCEL SERVICES
FRANK RAHN	EPRI
JIM ANDRACHEK	WESTINGHOUSE/WOG
MIKE KITLAN	DUKE ENERGY
JACK STRINGFELLOW	SOUTHERN NUCLEAR OPERATING COMPANY
J. E. DUSTY RHOADS	ENERGY NORTHWEST/BWROG
DREW RICHARDS	STP NOC
SCOTT HEAD	STP NOC
BOB SCHOMAKER	FRAMATOME-ANP
RAY SCHNEIDER	WESTINGHOUSE PSA
DON McCAMY	BWROG/TVA
GENE KELLY	EXELON
DAVID HELHER	EXELON
BILL BECKNER	NRC/NRR/DRIP/RORP
BOB DENNIG	NRC/NRR/DRIP/RORP/TSS
KERRI KAVANAGH	NRC/NRR/DRIP/RORP/TSS
PETER HEARN	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 CARUSO	NRC/NRR/DSSA/SPSB
CLIFF DOUTT	NRC/NRR/DSSA/SPSB
GEORGE THOMAS	NRC/NRR/DSSA/SRXB
WAYNE SCOTT	NRC/NRR/DIPM/IEHB
SCOTT WALL	NRC/NRR/DLPM/LPD1

AGENDA

TSB/NEI RITSTF Meeting

May 15, 2003 from 8:30 AM to 12:30 PM, in O-13 B4

- Status of Initiatives
 - Initiative 3, LCO 3.0.4 & SR 3.0.4 (Mode Restraint) Flexibility
Success
July 17, 2003 Workshop on Implementation of Initiatives 2 & 3
 - Initiative 4b, RI AOTs with CRMP
Review of:
Industry proposed approaches, pilots
RMTS Risk Management Guide
CE Pilot, TSTF-424
- Public Questions and Discussion
- Initiative 7, Non-TS Support System Inoperability Impact on TS System & TSTF-372
- 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
- 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

**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"> TSTF-422 submitted to NRC on January 24, 2003. TSTF-423 to be submitted to NRC in 6/03. 	<ul style="list-style-type: none"> 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. 	<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>

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

NEI RITSTF

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
BWOG Rick Hill, GE, 408 925-5388
Dusty Rhoads, Energy Northwest, 509 377-4298
Don McCamy, TVA 256 729-4595

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/ SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
2	Missed Surveillances SR 3.0.3	<ul style="list-style-type: none"> TSTF-358, R6, has been approved and published for CLIIP adoption. 	<ul style="list-style-type: none"> Initiative Complete 	TSTF-358 R6
3	Increase Flexibility in Mode Restraints LCO 3.0.4	<ul style="list-style-type: none"> TSTF-359, R8, has been approved and published for CLIIP adoption. TSTF-359, R9, has been approved by NRC and will be posted on NRC web site. 	<ul style="list-style-type: none"> 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 published for availability on 3/26/03. <p>TSTF submitted TSTF-359, Rev. 9, to NRC on 4/28/03 incorporating changes made in the Notice of Availability, NRC has stated that Rev. 9 is approved and will be posted on NRC web site.</p>	TSTF-359 R9
4a	Individual Risk Informed Allowed Outage Times (AOTs)	<ul style="list-style-type: none"> Individual Owners Groups (OGs) and plants are pursuing individual Risk Informed AOTs through Topicals and license amendments. 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> TSTF-424 and the Draft Risk Management Guide were provided to the NRC on 1/21/03. 	<ul style="list-style-type: none"> 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 (continued)	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.	<ul style="list-style-type: none"> NRC plans to get initial responses to Industry in 5/03 	TSTF-424 R0
5a	Relocate Surveillance Requirements Not Related to Safety	<ul style="list-style-type: none"> Deterministic portion of Initiative 5 transferred to TSTF responsibility. 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> RITSTF/BWROG/Pilot Plant will be applying the methodology and interfacing with the NRC on the issues in 2003. 	<ul style="list-style-type: none"> 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 7/15/03 for RITSTF/TSTF review. RITSTF to provide the Draft Guidance Document and the draft TSTF to NRC by 7/03 BWROG has identified two pilot plants 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 in 1/04. 	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	<ul style="list-style-type: none"> On hold. 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> NRC drafting Safety Evaluation. 	<ul style="list-style-type: none"> CEOG to provide revised version to address the RAIs to NRC in 7/03 NRC will finalize the SE based on the CE responses and should have it completed by 9/03. CEOG to provide a list of ISTS changes and justification to TSTF after NRC completes Safety Evaluation. 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 11/03. 	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	<ul style="list-style-type: none"> NRC drafting Safety Evaluation. 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> • TSTF-427 transmitted to NRC on 3/4/03. • Draft Revision 4 of TSTF-372 determined to not meet the original goals of the change. TSTF and SNUG to address issue with NRC management. 	<ul style="list-style-type: none"> • Draft Revision 4 of TSTF-372 created on 2/24/03. NRC reviewed and agreed it addressed their comments. Draft being reviewed by TSTF, RITSTF, and Snubbers Users Group (SNUG). • Consensus of TSTF, RITSTF, and SNUG is that TSTF-372 as structured is not beneficial and does not meet the original goals of the change. TSTF to work with the SNUG to address the issue with NRC management in order to accomplish the goals of the Traveler as originally proposed by NRC. • 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. 	<p>TSTF-372 R2</p> <p>TSTF-427 R0</p>

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	<ul style="list-style-type: none"> A White Paper on the process to address this scope of SSCs is being developed. 	<ul style="list-style-type: none"> RITSTF will develop a White Paper to outline the process to address this scope of SSCs by 12/03. 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 2/04. 	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"> A White Paper on the application of the 10 CFR 50.36 criteria is being developed. 	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> Requires Rulemaking 	<ul style="list-style-type: none"> 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

INITIAL STAFF IMPRESSIONS OF RMTS RISK MANAGEMENT GUIDE

- 1.a. Times for performing risk assessments need a rational basis. Why 24 hours for emergent conditions; why not 6 hours or less; why not minutes? How is [6] hour "re-assessment" time limit implemented? Why 30 days for the backstop time; what precludes a NOED at that point? [pages 4, 8, 10, 13]
- 1.b. Why is reliance on front stop CTs appropriate for multiple inoperabilities. [page 15]
2. Terms need to be better defined and explained; "functional" vs "operable", "degree of residual capability", "intended" vs "specified", "restored to service", "key safety function", "RMTS tool" vs "quantitative risk assessment tool", etc.
- 3.a. How does risk assessment of (a)(4) differ from risk assessment of "inoperability"/for determining appropriate CT? Says the assessment process will be "three tiered" but the tiers are not discussed. Guidance needs to be more detailed and explicit. [pages 4, 8]
- 3.b. PRA Quality considerations need to be defined; depth/rigor "commensurate with complexity of plant configuration"; qualitative vs quantitative vs blended risk assessment requirements need to be explicit. Shouldn't level 3 ASME PRA standards be required for technical specification work rather than level 2? What is more important than operational safety? [pages 13, 14]
- 3.c. Why is consideration of transitional risk optional? [page 7]
- 4.a. It is not evident what decisions or actions the quantitative and qualitative considerations discussed refer to or how they relate logically (to the unspecified action or decision). What acceptance criteria will the results of these considerations be tested against? Qualitative Consideration 1 and 3 seem to be redundant since they both address impact on "key safety functions." [pages 15, 16]
- 4.b. Why are acceptance criteria of RG 1.177/1.174 not used? They seem entirely appropriate for TS work. [page 19]
5. Use of figures needs work. The static nature of figure 3-1 does not capture the dynamic nature of emergent conditions. For example, what happens when an emergent condition creates a configuration that is outside the modeling capability of the PRA so that calculation of a RICT is not possible? The discussion of determining a RICT under Process Description is hard to follow and could benefit from use of a diagram. [pages 4, 5, 11, 26]
6. The discussion of RMTS and RMTS Assessment Scope is very confusing. What about initiating events caused by out-of-scope components; how are they captured? [page 14]
7. The staff fully supports and expects that RMTS Quantitative Risk Acceptance Guidelines will be implemented that include both instantaneous and cumulative performance indicators, and used to assess risk management as an element of a unit's annual NRC assessment. [page 21]

BWROG Initiative 5b Method

Presentation to the NRC

RITSTF Meeting

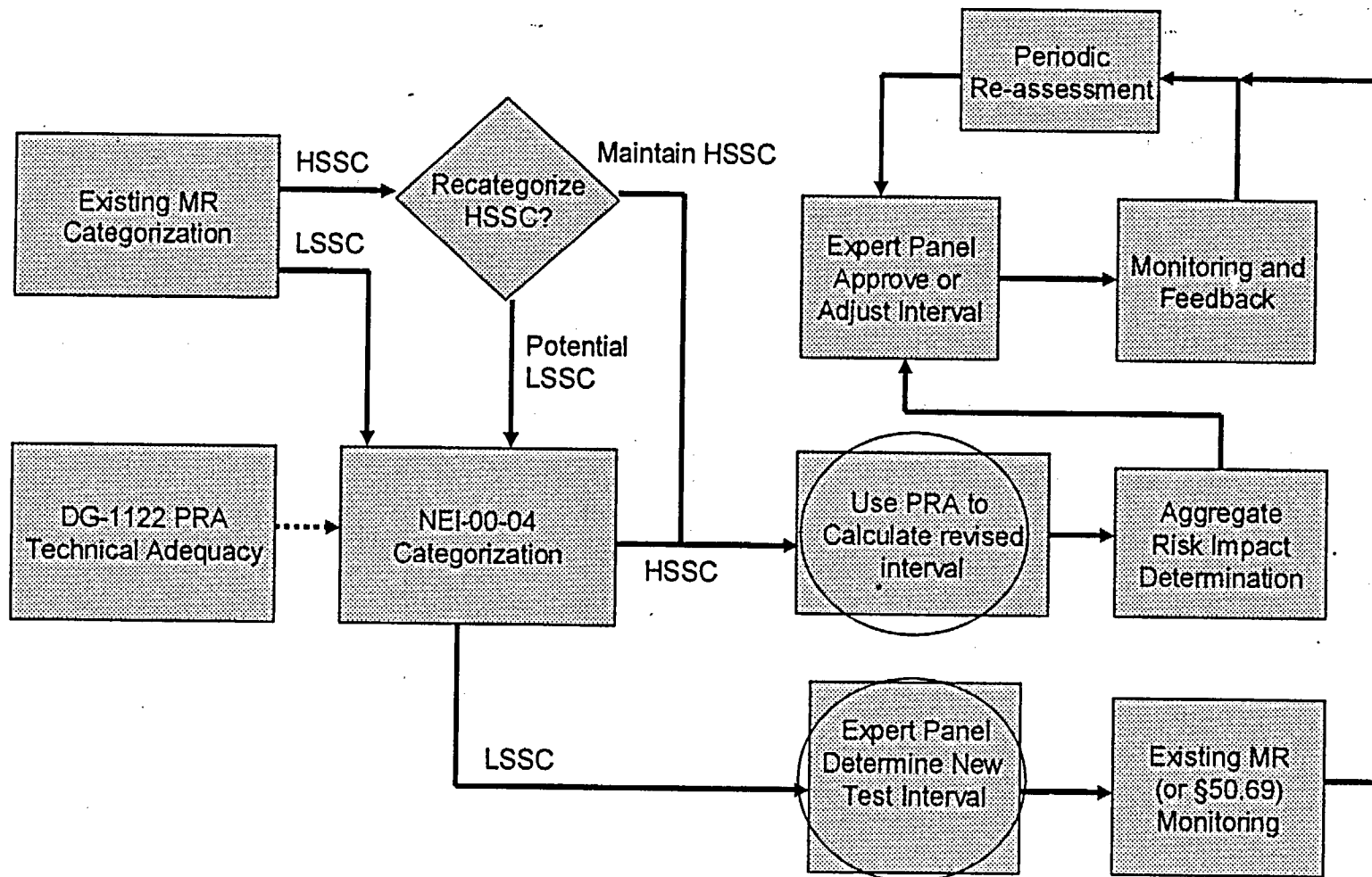
May 15, 2003

Exelon & BWROG

Project Definition

- Initiative 5b project has 2 pilots
 - Limerick (STS plant)
 - Peach Bottom (ITS plant)
- Both have fire PRAs
- Both plants have SMA
- Both plants have addressed peer review comments and have updated their models
- Both have full level 2 PRAs
- Shutdown PRA – Peach Bottom only

Tech Spec Initiative 5B Process



Process Highlights

- Pilot project to demonstrate method for optimizing STIs
- Process applies to HSS and LSS SSCs
- Use DG 1122 (current version)
- Use NEI 00-04 Rev. D.
- Sixteen candidate STIs
 - Testing all elements of the method
- Fee waivers will be requested for both pilots and the TSTF

Risk Informed Initiative 5b
Peach Bottom and Limerick

RI-STI LEG / Candidate Surveillance	Current TS Frequency	Modeled High	Modeled Low	Can Be Modeled (Including, Shutdown, Fire, Seismic)		Impractical to Model (Step 27)	Fire (Currently Modeled)	Seismic (Currently Modeled)	Benefits
				High	Low				
1. LGS EDG Run (and UV relays)	M			X			Can be	No	On-line work coordination
2. CRD Notching	W					X	No	No	Man-hours; on-line work coordination; reactivity management
3. LOCA / LOOP	R			X			Can be	No	Man-hours; outage work control; outage length
4. HPCI / RCIC 150 # Test	R				X		No	No	Outage work control; outage length
5. PBAPS Valve Lineup Verification	M	X					Yes	--	Man-hours; ALARA
6. LGS Turbine Valve Testing (SV, CV, MSIV) RPS Channel Functional Test	Q		X				Yes	No	Man-hours; on-line work coordination; production risk; reactivity management
7. PBAPS UV Bus Relays	M	X					Yes	--	Man-hours; production risk
8. Bridge Crane (Interlocks)	W					X	No	No	Outage work control; outage length
9. PBAPS Low Pressure ECCS Instrument (LPCI, Core Spray)	Q		X				Yes	--	Man-hours, production risk
10. LGS NSSSS LSF (D/W High Pressure) NSSSS Logic System Functional	R				X		Can be	No	Outage work control; outage length; man-hours
11. CRD Individual Accumulator Pressure	W					X	No	No	Man-hours; ALARA; reactivity management
12. SGTS / RERS Flow	M				X		No	No	Man-hours
13. LGS IRM / SRM NIs	W					X	No	No	Outage work control; outage length; reactivity management
14. LPRM Calibration (TIP System)	1000 MWD/T				X		Can be	No	Man-hours; production risk; reactivity management
15. DC Battery Charger	R	X					Yes	No	Outage work control; outage length
16. SDV High Level Float Switch	Q			X			Can be	No	Man-hours

Legend:

M = Monthly
W = Weekly
Q = Quarterly
R = Refuel Cycle

Schedule

- Method to NRC for review July 2003
- Anticipate submittal of both LAR and TSTF in January 2004
 - Combined submittal