

February 23, 2004

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

SUBJECT: FEBRUARY 11, 2004: 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 February 11, 2004. In principle, the final industry submittals for Risk Management Technical Specifications (RMTS) Initiatives 1, on preferred end states for CE and BWR plants, and Initiative 7, on snubber and hazard barrier inoperabilities, have been agreed to and success in these areas is expected in the coming months. Progress is also being made on the other initiatives.

Sincerely,

*/RA/*

T. R. Tjader, Senior Reactor Engineer  
Technical Specifications Section  
Reactor Operations Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

Enclosures:

1. Meeting Summary
2. Attendance List
3. Agenda
4. RITSTF Initiative Status
5. RMTS Initiative 4b Acceptance Criteria

cc w/encl: See attached page

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MDTschiltz (RidsNrrDssaSpsb)

JNHannon (RidsNrrDssaSplb)

ACRS/ACNW (RidsAcrsAcnwMailCenter)

OGC (RidsOgcRp)

FMReinhart (FMR)

CKDoutt (CKD)

RKMathew (RKM)

MLWohl (MLW1)

DFThatcher (DFT)

DHShum (DHS)

NSaltos (NTS)

MACaruso (MAC)

WScott (WES)

MDrouin (MXD)

GSShukla (GSS)

MCThadani (MCT)

SPWall (SPW)

SCDinsmore (SCD)

WDReckley (WDR)

SBSun (SBS)

DGHarrison (DGH)

OPChopra (OPC)

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. Gene Kelly  
Exelon

Mr. Glenn Stewart  
Exelon

Mr. Phil Tarpinian  
Exelon

Ms. Nancy Chapman  
SERCH/Bechtel

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

Mr. David Helher  
Exelon

Mr. James Liming  
ABSG

Mr. Stanley Levinson  
Framatone ANP

## SUMMARY OF THE FEBRUARY 11, 2004, 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 February 11, 2004, from 9:00 a.m. to 11:15 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.

**Initiative 1, TS Actions End States Modifications:** NEI responded to staff comments on CE TSTF-422 by letter on November 10, 2003. Review comments to BWR TSTF-423 were provided on November 13, 2003. CE and BWR issues were discussed at a meeting on January 30, 2004, and most issues were resolved. NEI to provide draft implementation guidance, for staff review, by March 15, 2004. Final issues are to be resolved subsequent to receipt of draft implementation guidance. The RITSTF stated that the B&W Topical Report was submitted during the week of January 23, 2004; the BWOG will provide an electronic version of the Topical Report to the staff. The Westinghouse Topical Report will be submitted by June 30, 2004.

**Initiative 4b, Risk Informed CTs/AOTs:** The staff and industry met to discuss the Risk Management Guidance Document on December 16, 2003. The staff and industry met to discuss the STP pilot proposal, including the staff's initial comments, on January 21, 2004. The staff and industry met to discuss the CE pilot proposal, including the staff's acceptance review comments on TSTF-424, on January 29, 2004. Significant points from those meetings were summarized and briefly discussed. The staff will provide written feedback resulting from the recent meetings by the end of March 2004. The industry will then update the RMTS Risk Management Guidance Document, CE TSTF-424, and the STP pilot proposals. If necessary, meetings to discuss and resolve final issues will be held prior to approval of the pilot plant proposals. It was noted that an objective of the Risk Management Guidance Document is to provide enough detail about the I4b process to allow the NRC to endorse it, possibly as a Regulatory Guide, such that it is suitable to be referenced in the Administrative Controls Section of the TS. This will provide suitable generic guidance on the I4b process for all follow-on plants adopting I4b. The staff provided RMTS Initiative 4b Pilot Plant Acceptance Criteria (Enclosure 5) for consideration; the general principles (Reliable, Repeatable, Oversight/Enforcement, and Exportable) for acceptance criteria were agreed upon. Also, it was agreed that I4b should be performance based. NEI will be providing a point paper on the nexus between I4b and Initiative 6, on LCO 3.0.3 entry times, in March 2004; a topic that was discussed at the STP pilot meeting on January 21, 2004.

**Initiative 5, Relocation of non-safety SRs (5a) and relocation of all SR frequency requirements (5b) out of TS:** It was noted that the I4b acceptance criteria, noted above, is equally applicable to this initiative. The RITSTF will now submit the Limerick pilot license amendment request, a Methodology Document, and the associated proposed technical specifications changes, TSTF-425, in late March or early April 2004. NEI no longer plans to submit a white paper on Initiative 5b addressing staff concerns that this proposal may conflict with requirements of 10 CFR 50.36. Industry believes that, between existing precedents for defining SR frequency requirements external to the TS and the documents to be submitted, a white paper would be superfluous.

**Initiative 6, Modification of LCO 3.0.3 Actions and Completion Times:** The RITSTF submitted a revised CE Topical Report on October 3, 2003. The staff will prepare a draft SE by April 30, 2004, on the revised CE Topical Report. The RITSTF plans to submit a proposed TSTF-426 after issuance of the final SER.

**Initiative 7, Non-TS support system impact on TS operability determinations:** The staff provided comments regarding TSTF-427, on barriers, to the RITSTF on June 26, 2003, and the RITSTF responded to the comments on November 7, 2003. The RITSTF submitted TSTF-372, Revision 3, on snubber inoperability, in November 2003. The staff provided feedback to TSTF-372, Revision 3, and TSTF-427, on barriers, at the meeting. It was agreed that the industry will provide, in Revision 4 to TSTF-372, a bounding risk assessment for snubbers affecting two trains, showing that the 12 hour delay time proposed in TSTF-372, Revision 3, is acceptable. The staff has found that the industry response to staff comments on TSTF-427 is generally acceptable, though lacking in detail. It was agreed that the industry will provide draft implementation guidance providing the necessary detail, that in its final form can be committed to by licensees, for implementation of TSTF-427. NEI will submit TSTF-372, Revision 4, and the TSTF-427 draft implementation guidance in March 2004.

**Initiative 8a, Remove/Relocate non-safety and non-risk significant systems from TS that do not meet 4 criteria of 10 CFR 50.36:** 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 staff will be presenting an RMTS overview, with emphasis on I4b, to an ACRS subcommittee on March 25, 2004, and to the full ACRS Committee on April 15, 2004. Industry/NEI participation was invited, and NEI accepted.

The next NRC TSS/NEI RITSTF meeting is scheduled for April 29, 2004, at the NRC Headquarters.

NRC/INDUSTRY MEETING OF THE  
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST  
FEBRUARY 11, 2004

<u>NAME</u>	<u>AFFILIATION</u>
TONY PIETRANGELO	NUCLEAR ENERGY INSTITUTE
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	TSTF/EXCEL SERVICES
FRANK RAHN	EPRI
JIM ANDRACHEK	WESTINGHOUSE/WOG
JACK STRINGFELLOW	SOUTHERN NUCLEAR OPERATING COMPANY
DREW RICHARDS	STP NOC
GARY CHUNG	SCE
DON McCAMY	TVA/BWROG
STANLEY LEVINSON	FRAMATOME-ANP
RAY SCHNEIDER	WESTINGHOUSE PSA
DEANN RALEIGH	SCIENTECH
NANCY CHAPMAN	SERCH/BECHTEL
BILL BECKNER	NRC/NRR/DIPM/IROB
TOM BOYCE	NRC/NRR/DIPM/IROB/TSS
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
KERRI KAVANAGH	NRC/NRR/DIPM/IROB/TSS
CARL SCHULTEN	NRC/NRR/DIPM/IROB/TSS
PETER HEARN	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
NICK SALTOS	NRC/NRR/DSSA/SPSB
MILLARD WOHL	NRC/NRR/DSSA/SPSB
MARK CARUSO	NRC/NRR/DSSA/SPSB
DAVID SHUM	NRC/NRR/DSSA/SPLB
SUMMER SUN	NRC/NRR/DSSA/SRXB
WAYNE SCOTT	NRC/NRR/DIPM/IEHB

# **AGENDA**

TSS/NEI RITSTF Meeting  
FEBRUARY 11, 2004  
9:00 A.M. - 12:30 P.M.  
0-13 B4

## Status of Initiatives

- Initiative 4b, Risk-Informed Completion Times
  - RMTS Risk Management Guidance Document
  - CE Pilot, TSTF-424
  - STP Pilot
- Public Questions and Discussion
- Initiative 1, End States
  - CEOG TSTF-422 Review Status
  - BWROG TSTF-423 Review Status
- Initiative 5b, SR Frequency Evaluation Methodology/SR Frequency TS Program
  - Limerick Pilot
  - SR Frequency TS Program/Methodology
- Initiative 8, Remove/Relocate non-safety & non-risk significant systems from TS
- Public Questions and Discussion
- Initiative 6, LCO 3.0.3 Actions and Completion Times
  - CEOG Final SER Status
- Initiative 7, Non-TS Support System Inoperability Impact on TS System & TSTF-372
  - TSTF-372, Rev 4, Status
  - TSTF-427 Status
- Public Questions and Discussion
- Schedule Next Meeting
- Closing Comments