

**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"> NRC provided comments on TSTF-422 on 6/23/03. TSTF and RITSTF provided responses on 11/10/03. TSTF-423 submitted to NRC on 8/12/03. 	<ul style="list-style-type: none"> TSTF-422, Rev. 1 was submitted to the NRC on 1/24/03. The NRC provided comments on TSTF-422 on 6/23/03. The TSTF and RITSTF provided responses on 11/10/03. Following NRC acceptance of comments, the final TSTF-422 will be submitted. The BWROG SE was issued 9/27/02 and the BWROG Topical A version was issued in 2/03. TSTF-423 was submitted to the NRC on 8/12/03. TSTF reviewed and provided comments on the BWOG Topical Report. BWOG Topical Report was submitted to NRC week of 1/23/04. RITSTF provided draft responses to NRC comments on TSTF 423 at the 1/30/04 meeting. NRC/Industry met 1/30/04 on TSTF 422 and TSTF 423. The NRC/RITSTF agreed to resolutions for all the NRC comments. TSTF will revise the TSTFs 422 and 423 accordingly and RITSTF/TSTF will provide a draft of the Initiative 1 Implementation Guidance to the NRC in March 2004. 	<p>CEOG - TSTF-422 R0</p> <p>BWROG - TSTF-423 R0</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"> • TSTF-358, R6, has been approved and published for CLIP 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, R9, has been approved and published for CLIP adoption. • The final Implementation Guidance, NEI-03-10, was issued on September 5, 2003. 	<ul style="list-style-type: none"> • Initiative Complete. 	TSTF-359 R9
4a	Individual Risk Informed Allowed Outage Times (AOTs)	<ul style="list-style-type: none"> • Owners Groups (OGs) are pursuing generic Risk Informed AOT extensions through OG-specific Topicals and license amendments. 	<ul style="list-style-type: none"> • Ongoing. 	TSTF-373 R2 (CEOG) TSTF-409 R1 (CEOG) TSTF-417 R0 (WOG) TSTF-430 R0 (BWOG) TSTF-439 R1 TSTF-446 R0 (WOG) TSTF-454 R0 (BWROG)

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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.	<ul style="list-style-type: none"> • NRC provided acceptance review comments on TSTF-424 on 10/2/03. NRC to provide first round of RAIs in the near future. • RITSTF provided the Interim Report to NRC at the 11/13/03 meeting. • RITSTF provided the Matrix of the responses to the NRC comments to NRC on 11/21/03. • RITSTF/NRC met to discuss the responses and documents 12/16/03. • STP met with NRC to discuss specifics of STP submittal 1/21/04. • RITSTF/NRC met 1/29/04 to discuss the TSTF 424 and associated risk guidance document. • RITSTF provided draft responses to NRC comments at the 1/29/04 meeting. • RITSTF will develop a White Paper to address the interface of the a.4 process to the Initiative 4b and Initiative 6 process to show the overlap and transition and provide to NRC in March 2004. • NRC will provide comments on the RMGD Industry response to NRC comments in March 2004. 	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 6/04. 	None assigned

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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. • RITSTF to address NRC position that Surveillance Test Intervals must be in the Technical Specifications 	<ul style="list-style-type: none"> • NRC provided a new concern regarding Surveillance Test Intervals at 5/15/03 RITSTF/NRC meeting. NRC stated that OGC was concerned that test intervals (Frequencies) should remain in Technical Specifications under 10 CFR 50.36. It may be acceptable for the Technical Specifications to contain a methodology rather than a fixed interval. • RITSTF to address NRC position that Surveillance Test Intervals must be in the Technical Specifications and NEI to provide a White Paper to NRC. • 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. • RITSTF provided a draft Technical Guidance Document to the NRC at the 11/13/03 meeting. • NRC attended several Limerick IDP meetings to observe process. • The TSTF is working closely with Limerick to ensure cohesiveness of the Limerick LAR and the TSTF. • Three documents will be submitted in late 3/04 to early 4/04: <ol style="list-style-type: none"> 1. Limerick Pilot as a License Amendment Request. 2. The Methodology Document 3. TSTF 425. 	TSTF-425 R0 <i>(Not created)</i>

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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 provided revised version to address the RAIs to NRC in 7/03. • NRC PSA Branch developed a draft SE and NRC will finalize the SE based on the CE responses. • CEOG to provide a list of ISTS changes and justification to TSTF after NRC completes Safety Evaluation. • TSTF reviewed CEOG Topical Report and recommended changes to support creation of a Traveler. CEOG developed a revision to the Topical to address NRC comments and the TSTF comments. • This revised topical was submitted to NRC 10/3/03. • The revised Topical is under NRC review and NRC plans to issue the draft SE 4/30/04. • TSTF to be submitted after NRC issues SE on Topical. 	TSTF-426 R0 <i>(Not created)</i>

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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 provided revised version to address the RAIs to NRC in 7/03. • NRC PSA Branch developed a draft SE and NRC will finalize the SE based on the CE responses. • CEOG to provide a list of ISTS changes and justification to TSTF after NRC completes Safety Evaluation. • TSTF reviewed CEOG Topical Report and recommended changes to support creation of a Traveler. CEOG developed a revision to the Topical to address NRC comments and the TSTF comments. • This revised topical was submitted to NRC 10/3/03. • The revised Topical is under NRC review and NRC plans to issue the draft SE 4/30/04. • TSTF to be submitted after NRC issues SE on Topical. 	TSTF-426 R0 <i>(Not created)</i>

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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"> • NRC provided comments on TSTF-427 on 6/26. • Revision 3 of TSTF-372 submitted on 11/17/03. 	<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). • TSTF, Snubbers User Group (SNUG), and NRC met to discuss TSTF-372 on June 16. SNUG gathered information from their members and worked with the TSTF to draft a revision that addresses the NRC and Industry concerns. Submitted Revision 3 on 11/17/03. • 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. • NRC provided comments on TSTF-427 on 6/26/03. RITSTF provided response to NRC comments on 11/7/03. • RITSTF/NRC discussed the RITSTF response at the 11/13/03 meeting. • NRC will provide feedback on RITSTF responses on TSTF 427 by February 2004. • TSTF/RITSTF will delete the additions to the definition of OPERABILITY for TSTF 427 and 372 to address NRC concerns. • TSTF/RITSTF will provide bounding analysis in the TSTF 372 for snubbers that affect both trains of a system. • TSTF/RITSTF will provide revisions to TSTF 372 and TSTF 427 in March 2004. • NRC will review and respond on TSTF 372 in March 2004. 	TSTF-372 R3 TSTF-427 R0

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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"> • 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 6/04. • RITSTF/TSTF will work with the NRC on a risk informed revision of GL 91-18 and integrate the Initiatives. • An Operability/GL 91-18 Workshop was held on 8/14/03 to discuss these issues. • A draft revision of GL 91-18 will be available 3/04 with another GL 91-18 Workshop currently scheduled for 4/09/04 • RITSTF/TSTF will develop a TSTF and submit to NRC by 8/04. 	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 2004. 	None assigned

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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. • Approach favored by NEI and NRC is making Criterion 4 a “two way door” (e.g., if it doesn’t meet Criterion 4, Specification can be relocated even if it meets Criteria 1, 2, or 3). 	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