

May 13, 2004

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

SUBJECT: APRIL 29, 2004: SUMMARY OF MEETING WITH RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE

Dear Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the Risk-Informed Technical Specification Task Force. The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on April 29, 2004. Significant progress is being made on the Risk Management Technical Specifications Initiatives. In the near future, generic changes are expected to be made available via the consolidate line item improvement program on: Initiatives 1, on preferred end states for CE and BWR plants; Initiative 6, on modified LCO 3.0.3 entry times for CE plants; and, Initiative 7, on snubber and hazard barrier inoperabilities for all plants.

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

cc w/encl: See attached page

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JNHannon (RidsNrrDssaSplb)

ACRS/ACNW (RidsAcrcsAcnwMailCenter)

OGC (RidsOgcRp)

FMReinhart (FMR)

CKDoutt (CKD)

RKMathew (RKM)

MLWohl (MLW1)

DFThatcher (DFT)

DHShum (DHS)

NSaltos (NTS)

MACaruso (MAC)

SMAlexander (SMA)

MDrouin (MXD)

GSShukla (GSS)

MCThadani (MCT)

SPWall (SPW)

SCDinsmore (SCD)

WDRreckley (WDR)

SBSun (SBS)

DGHarrison (DGH)

OPChopra (OPC)

KCoyne (KXC)

Mr. Biff Bradley

cc via e-mail:

Mr. Tony Pietrangelo
Nuclear Energy Institute

Mr. Biff Bradley
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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 APRIL 29, 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 April 29, 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, in June 2004. Final issues are to be resolved subsequent to receipt of draft implementation guidance. The RITSTF submitted the B&W Topical Report (BAW-2441, Rev 2) on January 19, 2004. The Westinghouse Topical Report will be submitted by June 30, 2004.

Initiative 4b, Risk Informed CTs/AOTs: The staff will provide written feedback resulting from the recent meetings by the end of May 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. NEI will be providing a point paper on the nexus between I4b and Initiative 6, on LCO 3.0.3 entry times, in May 2004; a topic that was discussed at the STP pilot meeting on January 21, 2004. The other I4b pilots are Fort Calhoun Station (CE single HPSI System pilot), and Hope Creek (a BWR unit). It is projected that STP and FCS will submit their pilot plant license amendment proposals during this coming summer. Hope Creek expects to submit at the end of 2005. The pilot plant submittals are expected to resolve questions such as what is the necessary scope and quality of PRAs required for I4b, the software QA/QC requirements of configuration risk monitors, and the adequacy of the risk assessment process described in the risk management guidance document.

Initiative 5, Relocation of non-safety SRs (5a) and relocation of all SR frequency requirements (5b) out of TS: The RITSTF will submit the Limerick pilot license amendment request, a Methodology Document, and the associated proposed technical specifications changes, TSTF-425, in May or June 2004.

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 the end of May 2004, on the revised CE Topical Report. The RITSTF plans to submit a proposed TSTF-426 after issuance of the final SER. As required, meetings to discuss and resolve TSTF-426 issues will be held.

Initiative 7, Non-TS support system impact on TS operability determinations: The industry provided Revision 4 to TSTF-372 on April 27, 2004. It included a bounding risk assessment for snubbers affecting two trains, showing that the 12 hour delay time proposed is acceptable. The staff will review TSTF-372R4, schedule meetings with industry if necessary to resolve issues, and prepare an SE for the initial CLIP FRN. 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-427 draft implementation guidance in May or June 2004.

Initiative 8, 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 conducting a public workshop on Generic Letter 91-18, Operability, on August 25, 2004.

The next NRC TSS/NEI RITSTF meeting is scheduled for August 19, 2004, at the NRC Headquarters.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
APRIL 29, 2004

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	TSTF/EXCEL SERVICES
BRIAN MANN	TSTF/EXCEL SERVICES
DENNIS BUSCHBAUM	TXU/WOG/TSTF
JOHN GAERTNER	EPRI
JIM LIMING	ABSG/EPRI
JIM ANDRACHEK	WESTINGHOUSE/WOG
JACK STRINGFELLOW	SOUTHERN NUCLEAR OPERATING COMPANY
WAYNE HARRISON	STP NOC
DREW RICHARDS	STP NOC
MARK RIEMER	FENOC
RAY SCHNEIDER	WESTINGHOUSE PSA
GABE SALAMON	NMC
MIKE KITLAN	DUKE ENERGY
DEANN RALEIGH	SCIENTECH
WILLIAM 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
NICK SALTOS	NRC/NRR/DSSA/SPSB
MILLARD WOHL	NRC/NRR/DSSA/SPSB
DAVID SHUM	NRC/NRR/DSSA/SPLB
SUMMER SUN	NRC/NRR/DSSA/SRXB
STEVE ALEXANDER	NRC/NRR/DIPM/IPSB
OM CHOPRA	NRC/NRR/DE/EEIB

AGENDA

TSS/NEI RITSTF MEETING

APRIL 29, 2004

9:00 A.M. - 12:30 P.M.

0-13 B4

1. Status of Initiatives
 - Initiative 4b, Risk-Informed Completion Times
 - RMTS Risk Management Guidance Document
 - CE Pilot, TSTF-424
 - STP Pilot
 - Hope Creek Pilot
2. Public Questions and Discussion
 - Initiative 1, End States
 - CEOG TSTF-422 Status
 - BWROG TSTF-423 Status
 - B&W Topical
 - 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