

August 27, 2004

MEMORANDUM TO: Stephen Dembek, Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Girija Shukla, Project Manager, Section 2 **/RA/**  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MEETING HELD ON AUGUST 17, 2004, WITH THE  
WESTINGHOUSE OWNERS GROUP (WOG) TO DISCUSS A  
PROGRAM TO ADD AN ACTION TO NUREG-1431 FOR TWO  
INOPERABLE REACTOR TRIP SYSTEM (RTS) OR ENGINEERED  
SAFETY FEATURES ACTUATION SYSTEM (ESFAS) CHANNELS

On August 17, 2004, representatives of the WOG met with the staff to discuss preparation of a future topical report (TR) based on a proposed WOG program to add an action to NUREG-1431, "Standard Technical Specifications Westinghouse Plants" for two inoperable RTS or ESFAS channels.

The WOG began the meeting with an overview presentation of the proposed WOG program and stated that Technical Specification (TS) 3.3.1, "RTS Instrumentation," and TS 3.3.2, "ESFAS Instrumentation," in NUREG-1431 do not contain an Action for two inoperable channels, and Limiting Condition for Operation 3.0.3 must be entered if two RTS or ESFAS channels are inoperable. This condition has occurred at Westinghouse plants resulting in a request for enforcement discretion. The WOG further stated that it plans to develop a risk-informed justification utilizing Regulatory Guide (RG) 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," and RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," that supports adding a required action and associated completion time for two RTS or ESFAS inoperable channels, only for RTS and ESFAS functions that contain four channels and that require two channels for signal actuation, because a four channel function can still perform the safety function with two inoperable channels.

Based on the WOG presentation, the staff expressed concerns with the proposal as this will be a violation of the single failure criteria required by 10 CFR 50.55(a)h. The staff has previously allowed exception to single failure criteria because of the hardship consideration based on the hardware design configuration. However, this is not the case for the WOG's proposal and violation of the single failure criteria affects one element of the defense-in-depth approach to reactor safety. Based on this, the staff does not believe that there is enough justification to

proceed with the proposed TR and compliance with the required single failure criteria should be addressed if the WOG intends to submit a TR for staff review.

Following the meeting, the staff expressed its appreciation to the WOG for the presentation. An attendance list is provided in the attachment. There were no members of the public represented at the meeting. The slides used during the meeting are available in ADAMS under Accession No. ML042310495.

Project No. 694

Attachment: Meeting Attendees

cc w/att:

Mr. James A. Gresham, Manager  
Regulatory Compliance and Plant Licensing  
Westinghouse Electric Company  
P.O. Box 355  
Pittsburgh, PA 15230-0355

Mr. Gordon Bischoff, Manager  
Owners Group Program Management Office  
Westinghouse Electric Company  
P.O. Box 355  
Pittsburgh, PA 15230-0355

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**Package No.: ML042400191**

**MEETING NOTICE ACCESSION NO.: ML041960431**

**PRESENTATION SLIDES ACCESSION Nos.: ML042310495**

**ADAMS Accession No.: ML042400171**

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## **MEETING ATTENDEES**

### **MEETING WITH THE WESTINGHOUSE OWNERS GROUP**

**August 17, 2004**

#### **WESTINGHOUSE OWNERS GROUP**

J. Andre  
J. Andrachek  
J. Smith

#### **NRC**

G. Shukla  
T. Boyce  
H. Garg  
C. Doult