

September 15, 2004

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

SUBJECT: SUMMARY OF MEETING ON SEPTEMBER 9, 2004, WITH THE 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 September 9, 2004. Significant progress is being made on the Risk Management Technical Specifications Initiatives. By the end of the year, generic changes are expected to be made available via the consolidate line item improvement program on: Initiatives 1, on preferred end states for CE plants (followed shortly thereafter by similar changes for BWR plants); and, Initiative 7, on snubber inoperability for all plants (followed shortly thereafter by changes on hazard barrier inoperability).

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. RAI/PRA Issues Categories
6. TSTF-372 RAI Responses

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)

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
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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 SEPTEMBER 9, 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 September 9, 2004, from 9:00 a.m. to 12:10 p.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of discussions of five of the active RITSTF initiatives, and Initiative 4a generic completion time extension submittals. 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: The safety evaluations for the Combustion Engineering Owner's Group (CEOG) and Boiling Water Reactor Owner's Group (BWROG) topical reports have been issued, and the industry has proposed technical specifications changes which are under staff review. NEI provided draft implementation guidance for the CE STS change, TSTF-422, for staff review, on May 27, 2004. Staff provided comments on the draft implementation guidance in July 2004, and issues are currently being resolved. The RITSTF submitted the B&W Topical Report (BAW-2441, Rev 2) on January 19, 2004. The staff provided RAIs on the B&W Topical Report on June 29, 2004, and subsequently the BWOG informed the staff that RAI responses would not be provided before March 2005. Therefore, the B&W Topical Report review is on hold. *Next Action:* NEI will provide TSTF-422 RAI responses in September 2004. TSTF-422 is expected to be available through the Consolidated Line Item Improvement Process (CLIIP) in December 2004. The staff will provide feedback on the content of the implementation guidance needed for the BWR STS change, TSTF-423.

Initiative 4b, Risk Informed CTs/AOTs: The staff provided RAIs to the Risk Management Guidance Document, the CE pilot proposal, TSTF-424, and the South Texas Project draft pilot proposal in July 2004. The industry has established an Initiative 4b subgroup, which has classified the RAI/PRA issues into 20 categories, listed in Enclosure 5. STP submitted their official pilot plant license amendment proposal on August 2, 2004, and FCS submitted their pilot plant license amendment proposal on May 14, 2004. Hope Creek, a BWR plant, expects to submit at the end of 2005. Prairie Island, an STS plant, has volunteered to be a pilot plant. *Next Action:* The industry will respond to the RAIs on the RMTS Risk Management Guidance, CE TSTF-424, and the STP pilot proposals, with a meeting to discuss issues scheduled for December 15, 2004. NEI will be providing a point paper on the nexus between I4b and Initiative 6, on LCO 3.0.3 entry times. The staff plans visits to the regional staff to conduct educational briefs, and then subsequent visits to pilot plants.

Initiative 4a, CT/AOT Extensions: Generic RG 1.177 CT/AOT extension submittals were discussed, in light of recent staff rejections. The staff noted that the generic topical reports supporting multiple CT/AOT extensions were lacking in that Tier 2 configuration constraints were lacking, and that multiple CT/AOT extensions need to consider the potential risk of multiple system inoperabilities either through extensive Tier 2 configuration constraints or in an Initiative 4b manner, and that aggregate risk must be taken into account. *Next Action:* Further discussions on future submittals are needed, with consideration given to routing generic Initiative 4a CT/AOT extension submittals through the RITSTF for a comprehensive and integrated review.

Initiative 5, Relocation of non-safety SRs (5a) and relocation of all SR frequency requirements (5b) out of TS: Exelon submitted Limerick's proposed pilot plant license amendment request on June 25, 2004. The industry is developing an Initiative 5b methodology. The associated proposed technical specifications changes, TSTF-425, were submitted on 31 August, 2004. *Next Action:* The industry will submit an Initiative 5b methodology document in September 2004. The staff will then commence an integrated review of Limerick's proposed pilot plant license amendment, TSTF-425, and the Initiative 5b methodology.

Initiative 6, Modification of LCO 3.0.3 Actions and Completion Times: The staff approved and issued the SER on the CE Topical Report on July 9, 2004. Industry submitted a proposed CE TSTF-426 on August 30, 2004. *Next Action:* NEI will provide draft implementation guidance in November 2004.

Initiative 7, Non-TS support system impact on TS operability determinations: The RITSTF submitted TSTF-372, Revision 4, on April 27, 2004, and the staff responded with comments on May 18, 2004. TSTF-372R4 included a bounding risk assessment for snubbers affecting two trains, showing that the 12 hour delay time proposed is acceptable. The staff has requested additional information on non-seismic snubbers (Enclosure 6). The staff has started writing the SE for TSTF-372, Revision 4, in May 2004, and is reviewing and resolving issues related to RITSTF responses to staff comments as they are provided. The staff has found that the industry response to staff comments on TSTF-427 are generally acceptable, though lacking in detail. *Next Action:* The staff is scheduled to issue the safety evaluation for TSTF-372 in September 2004, subsequent to the resolution of the final issue. The RITSTF will provide TSTF-427 draft implementation guidance in September 2004.

The staff conducted a public workshop on Generic Letter 91-18, Operability, on August 25, 2004.

The next NRC TSS/NEI RITSTF meeting is tentatively scheduled for the last week in January 2005, at the NRC Headquarters.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
SEPTEMBER 9, 2004

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	RITSTF/EXCEL SERVICES
JIM LIMING	ABSC/EPRI
JIM ANDRACHEK	WESTINGHOUSE/WOG
ALAN HACKEROTT	OPPD
GARY CHUNG	SONGS
WAYNE HARRISON	STP NOC
DREW RICHARDS	STP NOC
MARK RIEMER	FENOC
RAY SCHNEIDER	WESTINGHOUSE PSA
GABE SALAMON	NMC
YU SHEN	NMC
MIKE KITLAN	DUKE ENERGY
RICK HILL	GE
WEI HE	PSEG NUCLEAR
DEANN RALEIGH	SCIENTECH
NANCY CHAPMAN	SERCH/BECHTEL
FRANK COSTELLO	NRC/NRR/DIPM/IROB
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
CARL SCHULTEN	NRC/NRR/DIPM/IROB/TSS
KERRI KAVANAGH	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
MARK CARUSO	NRC/NRR/DSSA/SPSB
NICK SALTOS	NRC/NRR/DSSA/SPSB
MICHELE LAUR	NRC/NRR/DSSA/SPSB

AGENDA

**TSS/NEI RITSTF MEETING
SEPTEMBER 9, 2004
9:00 A.M. - 12:30 P.M.
0-9 B4**

- Status of Initiatives
 - Initiative 4b, Risk-Informed Completion Times
 - RMTS Risk Management Guidance Document
 - CE Pilot, TSTF-424
 - FCS Pilot
 - STP Pilot
 - Hope Creek Pilot
 - Prairie Island Pilot
 - Initiative 4a, Generic RG 1.177 Completion Time Extensions
- 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 Status
 - 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 TSTF-426 Status
 - Initiative 7, Non-TS Support System Inoperability Impact on TS System & TSTF-372
 - TSTF-372, Rev 4, SER Status
 - TSTF-427 Status
- Public Questions and Discussion
- Schedule Next Meeting
- Closing Comments