

**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"> Industry and NRC developing implementation guidance for TSTF-422 and TSTF-423. 	<ul style="list-style-type: none"> NRC/Industry met 1/30/04 on TSTF 422 and TSTF 423. The NRC/RITSTF agreed to resolutions for all the NRC comments. A draft of the TSTF-422 implementation guidance document was provided to the NRC for comment in 6/04. NRC provided comments on 7/9/04 and a revised document has been developed to address these comments. The document will be submitted to NRC by 9/20/04. NRC will attempt to issue TSTF 422 Notice for Comment and Availability in 2004. TSTF-423 was submitted to the NRC on 8/12/03. RITSTF provided draft responses to NRC comments on TSTF 423 at the 1/30/04 meeting. A draft of the TSTF-423 implementation guidance document was provided to the NRC on 7/20/04. The NRC had not provided any comments before the 9/9/04 meeting. The NRC wants more information in the BWROG TSTF 423 Implementation Guidance. Based on review of the CEOG TSTF 422 Implementation Guidance, the NRC will provide the scope of additional information they want to BWROG. 	CEOG - TSTF-422 R0 BWROG - TSTF-423 R0 BWOG - TSTF-431 R0 WOG - TSTF-432 R0 <i>(Not created)</i>

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1	Technical Specification Required Actions Preferred End States	<ul style="list-style-type: none"> • Industry and NRC developing implementation guidance for TSTF-422 and TSTF-423. 	<ul style="list-style-type: none"> • BWOG Topical Report was submitted to NRC on 1/19/04. The NRC provided an RAI on 6/29/04. BWOG informed the NRC they could not respond to the RAI until early 2005, and the NRC has put review of the Topical Report on hold. • TSTF-431 has been distributed to the BWOG and the RITSTF for review. 	CEOG - TSTF-422 R0 BWROG - TSTF-423 R0 BWOG - TSTF-431 R0 WOG - TSTF-432 R0 <i>(Not created)</i>

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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 (ALL OG) 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	<p>Hope Creek, Fort Calhoun, South Texas Project, and Prairie Island have volunteered to develop pilot submittals.</p> <p>Fort Calhoun and South Texas Project have submitted their pilots.</p>	<ul style="list-style-type: none"> • 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 for ITS and non ITS plants and provide to NRC in October 2004. • NRC provided 3 separate RAIs in 8/04 to NEI. • The RITSTF has created an Initiative 4b Subgroup to coordinate responses to the NRC RAIs. • Current schedule is to provide responses to NRC and meet in 12/04. 	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 12/04. 	None assigned
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 2004. 	<ul style="list-style-type: none"> • NRC attended several Limerick IDP meetings to observe process. • The Limerick lead plant license amendment was submitted on June 11, 2004. • TSTF-425 was submitted to the NRC on 8/31/04. • NEI is preparing the methodology document for submittal to the NRC in 09/04. 	TSTF-425 R0

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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 issued Safety Evaluation for Topical Report on 7/9/04. • TSTF-426 R0 was submitted to the NRC on 8/30/2004. 	<ul style="list-style-type: none"> • CEOG submitted revised version of Topical Report to address NRC RAIs in 10/03. • NRC issued Safety Evaluation for Topical Report on 7/9/04. • TSTF-426 R0 was submitted to the NRC on 8/30/04. • RITSTF submit draft Implementation Guidance in 11/04. 	TSTF-426 R0
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 issued Safety Evaluation for Topical Report on 7/9/04. • TSTF-426 R0 was submitted to the NRC on 8/30/2004. 	<ul style="list-style-type: none"> • CEOG submitted revised version of Topical Report to address NRC RAIs in 10/03. • NRC issued Safety Evaluation for Topical Report on 7/9/04. • TSTF-426 R0 was submitted to the NRC on 8/30/04. • RITSTF submit draft Implementation Guidance in 11/04. 	TSTF-426 R0

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7a	Impact of Non Technical Specification Design Features on Operability Requirements - Barriers	<ul style="list-style-type: none"> • TSTF-372, Rev. 4 submitted on 4/23/04. • TSTF-427 submitted on 3/4/03. • NRC provided comments on TSTF-427 on 6/26/03. 	<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. TSTF-372, Rev. 4 submitted to NRC on 4/23/04. • On 5/28/04, the NRC requested additional information to support review of TSTF-372. The TSTF/RITSTF responded on 6/7/04. • NRC requested additional information in 7/04 and Industry/NEI responded with responses 9/7/04. • NRC plans FRN for Comment for TSTF 372 by 10/04. • NRC provided feedback on RITSTF responses on TSTF 427 in February 2004. • TSTF/RITSTF will delete the additions to the definition of OPERABILITY for TSTF 427 to address NRC concerns. • TSTF-427 implementation guidance being developed and will be provided to the NRC by 09/17/04. • TSTF/RITSTF will provide a revision to TSTF-427 after completion of the implementation guidance document. 	<p>TSTF-372 R4</p> <p>TSTF-427 R0</p>

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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 10/04. • RITSTF/TSTF reviewed and has commented on the revised Operability guidance that will supersede the guidance distributed with GL 91-18. • RITSTF/TSTF will develop a TSTF and submit to NRC by 12/04. 	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 fourth 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