

February 8, 2005

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

SUBJECT: SUMMARY OF MEETING ON JANUARY 28, 2005, 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 January 28, 2005. Significant progress is being made on the Risk Management Technical Specifications Initiatives. The risk-informed technical specification change on snubber inoperability, TSTF-372, will be made available for adoption by licensees in the near future.

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. BWROG Initiative 1 Implementation Guidance
6. RAI BWROG Topical NEDC-33046 LERF Assessment

cc w/encl: See attached page

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DFThatcher (DFT)

SDAlexander (SDA)

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KCoyne (KXC)

MDrouin (MXD)

MCThadani (MCT)

GWMorris (GWM2)

YGHsii (YGH)

DHShum (DHS)

RKMathew (RKM)

GWPerry (GWP)

ABWang (ABW)

BMPPham (BMP)

AJHowe (AJH1)

TWAlexion (TWA)

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

Mr. John Gaertner
EPRI

SUMMARY OF THE JANUARY 28, 2005, 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 January 28, 2005, from 9:00 a.m. to 12:05 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 have been found acceptable. NEI provided draft implementation guidance for the CE STS change, TSTF-422, and for the BWR STS change, TSTF-423. Issues related to the draft implementation guidance have been resolved. The BWROG provided an updated version of the BWR implementation guidance (Enclosure 5). The staff will now prepare the first CLIIP Federal Register Notices requesting public comment. 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. At this meeting the BWOG informed the staff that RAI responses would be provided in February 2005. *Next Action:* NEI will provide final versions of the implementation guidance. The TSTF-422 and TSTF-423 SE will be published in the Federal Register, requesting public comment, as part of the Consolidated Line Item Improvement Process (CLIIP).

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. On December 15, 2004, industry and the staff met to discuss the RAIs. At that time an updated version of the Risk Management Guidance Document was submitted. 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, and Prairie Island, an STS Westinghouse plant, expect to submit at the end of 2005. On January 19, 2005, the NRC staff visited STP to become familiar with their Configuration Risk Management Process (CRMP), and their CRMP tool, RASCAL. The NRC staff visit to STP was very informative and productive in helping the staff gain an appreciation of the STP CRMP capabilities; confidence was gained. The visit highlighted the need in RMTS Initiative 4b to adequately address: PRA and CRMP scope and capability; PRA and CRMP updates; QA requirements; and, whether the NEI/EPRI Risk Management Guidelines should be incorporated into the Technical Specifications. The staff will be developing a TI for providing inspection guidance. *Next Action:* The industry and staff will meet in March 2005 to define RMTS Initiative 4b requirements with respect to PRA and CRMP scope and capability, and to address the issues highlighted by the STP staff visit. The industry will provide updated RMTS Risk Management Guidance, CE topical report and TSTF-424, within a month of the March 2005 meeting reflecting the results of that meeting and the December 15, 2004 meeting. The staff will provide RAIs on the STP pilot LAR within a month of the March 2005 meeting. NEI will

be providing in February 2005 a point paper on the nexus between I4b and Initiative 6, on LCO 3.0.3 entry times. The staff is planning to meet with the ACRS to discuss RMTS Initiative 4b developments in about the May 2005 time frame.

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, 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, that aggregate risk must be taken into account, and that external events must be addressed. It was noted that the North Anna Plants have submitted a fluid systems completion time extension license amendment request that, while not referencing the rejected WOG topical report it was of a similar nature. The North Anna LAR is under review and could act as a lead plant for the topical if approved. The WOG does intend to submit a revised topical addressing staff concerns. The status of the WOG Electrical Systems topical (WCAP-15622), which is currently under review, was questioned. *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 February 2005. The staff will then complete an integrated review of Limerick's proposed pilot plant license amendment, TSTF-425, and the Initiative 5b methodology, and provide RAs about a month thereafter.

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. The staff provided RAs for CE TSTF-426 on November 13, 2004. *Next Action:* Industry will provide RA responses and develop implementation guidance by the end of March 2005.

Initiative 7, Non-TS support system impact on TS operability determinations: The staff completed the SE for TSTF-372, Revision 4, on September 27, 2004. On November 24, 2004, the NRR staff published in the Federal Register the model SE for TSTF-372, Revision 4, and a no-significant-hazards-consideration determination statement to make this change available via the Consolidated Line Item Improvement Process. The Federal Register Notice (69 FR 68412, November 24, 2004) requested public comment, and some comments have been received. The staff has found that the industry response to staff comments on TSTF-427 is generally acceptable, though lacking in detail. The industry provided draft implementation guidance for TSTF-427 on September 20, 2004. The staff provided RAs for TSTF-427 on November 13, 2004. *Next Action:* The staff will resolve issues related to the public comments received in response to the Federal Register Notice (FRN) request, and issue an FRN making TSTF-372 available via CLIP. Industry will respond to the staff's RAs on the proposed TSTF-427 implementation guidance by the end of March 2005. A summary of near term milestones are:

- Initiative 1: February 2005 - BWOOG submit B&W Topical Report RAI Responses
March 2005 - Staff publish initial CLIIP FRN for TSTFs -422 & -423
- Initiative 4b: February 2005 - NEI submit Initiative 4b/Initiative 6 Nexus Point Paper
March 2005 - PRA/CRMP Quality Issues Meeting
April 2005 - Industry submit updated: Risk Management Guide,
CE Topical and TSTF-424
- NRC Staff provide RAIs on STP LAR
- Initiative 5b: February 2005 - NEI submit formal Methodology Document
March 2005 - Staff provide RAIs on: Limerick LAR, TSTF-425, and
Methodology Document
- Initiative 6: March 2005 - NEI submit TSTF-426 RAI responses
- Initiative 7b: March 2005 - Staff publish CLIIP FRN on TSTF-372 availability
- NEI submit TSTF-427 RAI responses

The next NRC TSS/NEI RITSTF meeting is scheduled for April 21, 2005, at the NRC Headquarters.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
JANUARY 28, 2005

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	RITSTF/EXCEL SERVICES
JOHN GAERTNER	EPRI
JIM ANDRACHEK	WESTINGHOUSE/WOG
JERRY ANDRE	WESTINGHOUSE/WOG
STANLEY LEVINSON	AREVA
JACK STRINGFELLOW	SNC
DREW RICHARDS	STP NOC
MARK RIEMER	FENOC
RAY SCHNEIDER	WESTINGHOUSE PSA
MIKE KITLAN	DUKE ENERGY
RICK HILL	GE
DEANN RALEIGH	SCIENTECH
NANCY CHAPMAN	SERCH/BECHTEL
TOM BOYCE	NRC/NRR/DIPM/IROB/TSS
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
ROBERT CLARK	NRC/NRR/DIPM/IROB/TSS
CRAIG HARBUCK	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
NICK SALTOS	NRC/NRR/DSSA/SPSB
ANDREW HOWE	NRC/NRR/DSSA/SPSB
Y. GENE HSII	NRC/NRR/DSSA/SRXB
DAVID SHUM	NRC/NRR/DSSA/SPLB
GEORGE MORRIS	NRC/NRR/DE/EEIB
ALAN WANG	NRC/NRR/DLPM
BO PHAM	NRC/NRR/DLPM
TOM ALEXION	NRC/NRR/DLPM

AGENDA

TSS/NEI RITSTF MEETING

JANUARY 28, 2005

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

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- Status of Initiatives
 - Initiative 4b, Risk-Informed Completion Times
 - RMTS Risk Management Guidance Document
 - CE TSTF-424, & FCS Pilot
 - STP Pilot, Site Visit by Staff on 1/19/05
 - Other Pilots (Hope Creek & Prairie Island), Other Issues
 - Initiative 4a, Generic RG 1.177 Completion Time Extensions
 - CIV AOT Extensions, TSTFs -373(CE0 -446(WOG) -454(BWR), see RAIs
- 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; need formal submittal
- Public Questions and Discussion
 - Initiative 7, Non-TS Support System Inoperability Impact on TS System
 - TSTF-372, Rev 4, CLIIP Status; comments received to first CLIIP FRN
 - TSTF-427 Status
 - Initiative 6, LCO 3.0.3 Actions and Completion Times
 - CEOG TSTF-426 Status
 - Initiative 8, Remove/Relocate non-safety & non-risk significant systems from TS
- Public Questions and Discussion
- Schedule Next Meeting
- Closing Comments