

**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"> <li>Industry revising implementation guidance for TSTF-422 and TSTF-423 to address NRC comments.</li> </ul>	<ul style="list-style-type: none"> <li>NRC/Industry met 1/30/04 on TSTF-422 and TSTF-423. The NRC/RITSTF agreed to resolutions for all the NRC comments.</li> <li>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. A revised draft was submitted to the NRC on 9/21/04.</li> <li>The NRC provided comments on the TSTF-422 implementation guidance on October 13. The RITSTF is revising the document to address the NRC's comments.</li> <li>The WOG transmitted the final TSTF-422 implementation guidance to NEI on 12/2/04. NEI forwarded the document to the NRC in 12/04.</li> <li>NRC plants to issue TSTF-422 Notice for Comment in March 2005.</li> <li>TSTF-423 was submitted to the NRC on 8/12/03.</li> <li>RITSTF provided draft responses to NRC comments on TSTF-423 at the 1/30/04 meeting.</li> <li>The NRC provided comments on the TSTF-423 implementation guidance on October 13. The RITSTF revised the document to address the NRC's comments.</li> <li>NRC plants to issue TSTF-423 Notice for Comment in March 2005.</li> </ul>	<p>TSTF-422 R0 (CEOG)</p> <p>TSTF-423 R0 (BWROG)</p> <p>TSTF-431 R0 (BWOG)</p> <p>TSTF-432 R0 (WOG) <i>(Not created)</i></p>

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1	Technical Specification Required Actions Preferred End States	<ul style="list-style-type: none"> <li>• Industry and NRC developing implementation guidance for TSTF-422 and TSTF-423.</li> </ul>	<p>(continued)</p> <ul style="list-style-type: none"> <li>• BWOG Topical Report was submitted to NRC on 1/19/04. The NRC provided an RAI on 6/29/04. The BWOG will respond in 2/05.</li> <li>• TSTF-431 was distributed to the BWOG and the RITSTF for review on 7/11/04.</li> </ul>	<p>TSTF-422 R0 (CEOG) TSTF-423 R0 (BWROG) TSTF-431 R0 (BWOG) TSTF-432 R0 (WOG) <i>(Not created)</i></p>
2	Missed Surveillances SR 3.0.3	<ul style="list-style-type: none"> <li>• TSTF-358, R6, has been approved and published for CLIP adoption.</li> </ul>	<ul style="list-style-type: none"> <li>• Initiative Complete.</li> </ul>	TSTF-358 R6
3	Increase Flexibility in Mode Restraints LCO 3.0.4	<ul style="list-style-type: none"> <li>• TSTF-359, R9, has been approved and published for CLIP adoption.</li> <li>• The final Implementation Guidance, NEI-03-10, was issued on September 5, 2003.</li> </ul>	<ul style="list-style-type: none"> <li>• Initiative Complete.</li> <li>• Revisions are needed to clarify the implementation guidance. The TSTF will provide the proposed changes to NEI in the first quarter of 2005.</li> </ul>	TSTF-359 R9
4a	Individual Risk Informed Allowed Outage Times (AOTs)	<ul style="list-style-type: none"> <li>• Owners Groups (OGs) are pursuing generic Risk Informed AOT extensions through OG-specific Topicals and license amendments.</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing.</li> <li>• TSTF-373R2 approved on 2/27/04.</li> <li>• TSTF-430R0 approved on 8/5/04.</li> </ul>	<p>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)</p>

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4b	Risk Informed AOTs With Configuration Risk Management Program or Maintenance Rule Backstop	<ul style="list-style-type: none"> <li>• Hope Creek, Fort Calhoun, South Texas Project, and Prairie Island have volunteered to develop pilot submittals.</li> <li>• Fort Calhoun and South Texas Project have submitted their pilots.</li> </ul>	<ul style="list-style-type: none"> <li>• 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 2/05.</li> <li>• NRC/RITSTF will meet 2/17-2/18, 2005 to discuss specifics of Initiative 4b</li> <li>• RITSTF will provide revised deliverables for the RMG, CEOG and STP based on the 12/15/04 meeting and 2/17-2/18, 2005 meeting results.</li> <li>• The RITSTF has created an Initiative 4b Subgroup to coordinate responses to the NRC RAIs.</li> <li>• The RITSTF provided responses to the NRC and met to discuss these responses on 12/15/04.</li> <li>• NRC visited STP week of 1/18/05 to evaluate applications of Initiative 4b.</li> </ul>	TSTF-424 R0
5a	Relocate Surveillance Requirements Not Related to Safety	<ul style="list-style-type: none"> <li>• Deterministic portion of Initiative 5 transferred to TSTF responsibility.</li> </ul>	<ul style="list-style-type: none"> <li>• TSTF reviewing candidate SRs to be relocated.</li> <li>• TSTF will provide a TSTF to the NRC by 6/05.</li> </ul>	None assigned

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5b	Relocate Surveillance Test Intervals to Licensee Control	<ul style="list-style-type: none"> <li>• RITSTF/BWROG/Pilot Plant will be applying the methodology and interfacing with the NRC on the issues in 2004.</li> </ul>	<ul style="list-style-type: none"> <li>• NRC attended several Limerick IDP meetings to observe process.</li> <li>• The Limerick lead plant license amendment was submitted on June 11, 2004.</li> <li>• TSTF-425 was submitted to the NRC on 8/31/04.</li> <li>• A final draft of the methodology document was provided to the NRC in 09/04.</li> <li>• NEI will provide the formal Methodology Document to NRC by 2/4/05.</li> <li>• NRC is currently reviewing the Limerick LAR, TSTF-425, and the methodology document and plans to issue RAIs in 3/05.</li> </ul>	TSTF-425 R0

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INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
6a	Modify LCO 3.0.3 Actions and Timing 1 hour - 24 hours	<ul style="list-style-type: none"> <li>• On hold.</li> </ul>	<ul style="list-style-type: none"> <li>• On hold for resolution of Initiative 6b and 6c to determine if Initiative 6a is required.</li> </ul>	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"> <li>• NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>• TSTF-426 R0 was submitted to the NRC on 8/30/2004.</li> </ul>	<ul style="list-style-type: none"> <li>• CEOG submitted revised version of Topical Report to address NRC RAIs in 10/03.</li> <li>• NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>• TSTF-426 R0 was submitted to the NRC on 8/30/04.</li> <li>• NRC provided an RAI on TSTF-426 on 11/13/04.</li> <li>• The TSTF will develop draft Implementation Guidance and provide responses to the NRC's RAIs by 3/31/05.</li> </ul>	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"> <li>• NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>• TSTF-426 R0 was submitted to the NRC on 8/30/2004.</li> </ul>	<ul style="list-style-type: none"> <li>• CEOG submitted revised version of Topical Report to address NRC RAIs in 10/03.</li> <li>• NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>• TSTF-426 R0 was submitted to the NRC on 8/30/04.</li> <li>• NRC provided an RAI on TSTF-426 on 11/13/04.</li> <li>• The TSTF will develop draft Implementation Guidance and provide responses to the NRC's RAIs by 3/31/05.</li> </ul>	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"> <li>• TSTF-372, Rev. 4 submitted on 4/23/04.</li> <li>• TSTF-427 submitted on 3/4/03.</li> <li>• NRC provided comments on TSTF-427 on 11/13/04.</li> </ul>	<ul style="list-style-type: none"> <li>• The NRC published the FRN Notice for Comment on TSTF-372 on 11/24/04.</li> <li>• The TSTF provided comments on the FRN Notice for Comment on 1/10/05.</li> <li>• The NRC is reviewing the TSTF comments and will work with the TSTF to revise the SE and issue the FRN Notice of Availability in 2/05.</li> <li>• NRC provided feedback on RITSTF responses on TSTF-427 in February 2004.</li> <li>• TSTF/RITSTF will delete the additions to the definition of OPERABILITY for TSTF-427 to address NRC concerns.</li> <li>• TSTF-427 implementation guidance was provided to the NRC on 09/21/04. NRC provided comments on the draft guidance on 10/13.</li> <li>• NRC provided an RAI on TSTF-427 on 11/13/04.</li> <li>• RITSTF will provide response to the NRC's RAIs by 3/31/05 and TSTF / RITSTF will provide a revision to TSTF-427 after completion of NRC review of the implementation guidance document and resolution of the NRC's questions.</li> </ul>	TSTF-372 R4  TSTF-427 R0
7b	Impact of Non TS Design Features on Operability Requirements – All other SSCs not in Technical Specifications	<ul style="list-style-type: none"> <li>• A White Paper on the process to address this scope of SSCs is being developed.</li> </ul>	<ul style="list-style-type: none"> <li>• RITSTF will develop a White Paper to outline the process to address this scope of SSCs by 3/05.</li> <li>• RITSTF/TSTF reviewed and has commented on the revised Operability guidance that will supersede the guidance distributed with GL 91-18.</li> <li>• RITSTF/TSTF will develop a TSTF and submit to NRC by 9/05.</li> </ul>	None assigned

## RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
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"> <li>• A White Paper on the application of the 10 CFR 50.36 criteria is being developed.</li> </ul>	<ul style="list-style-type: none"> <li>• NEI 00-04 is being reviewed and will serve as the basis for Criterion 4 application.</li> <li>• 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 second quarter 2005.</li> </ul>	None assigned
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"> <li>• Requires Rulemaking</li> </ul>	<ul style="list-style-type: none"> <li>• RITSTF looking at coordinating Initiative 8b with longer term initiatives given the requirements for rulemaking.</li> <li>• 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).</li> </ul>	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