



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 16, 2005

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

SUBJECT: SUMMARY OF MEETING ON APRIL 21, 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 April 21, 2005. Significant progress is being made on the Risk Management Technical Specifications Initiatives. The meeting was expanded to include a discussion of the Risk Management Technical Specifications Initiative 4b, Risk-Informed Completion Times, Risk Management Guidance Document.

Sincerely,

A handwritten signature in black ink, appearing to read "T. R. Tjader".

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. RMTS Initiative 4b Risk Management Guidance Document Discussion Topics
6. White Paper, Interface of RITSTF Initiative 4b and Initiative 6b/c

cc w/encl: See next page

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Sincerely,

/RA/

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Technical Specifications Section
Reactor Operations Branch
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cc w/encl: See next page

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ADAMS ACCESSION NUMBER:

DOCUMENT NAME: G:\DIPMITSS\Tjader\RITSTF-MTGsum-4-21-05.wpd

OFFICE	TSS:IROB-A:DIPM	SC:TSS:IROB-A:DIPM		
NAME	TRTjader <i>TRT</i>	THBoyce <i>TH</i>		
DATE	05/16/2005	05/16/2005		

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Mr. Biff Bradley

cc via e-mail:

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Mr. Biff Bradley
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Mr. Mike Schoppman
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Mr. Alan Hackerott, Chairman
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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
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Mr. J. E. Rhoads
Energy Northwest

Ms. Deann Raleigh
Scientech

Mr. Ken Canavan
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Mr. Sam Chien
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TRQuay (RidsNrrDipmleh)

OGC (RidsOgcRp)

ACRS/ACNW (RidsAcrsAcnwMailCenter)

NSaltos (NTS)

MLWohl (MLW1)

GSShukla (GSS)

SPWall (SPW)

WDReckley (WDR)

FMReinhart (FMR)

DGHarrison (DGH)

CKDoutt (CKD)]

DFTatcher (DFT)

SDAlexander (SDA)

PFPrescott (PFP)

KCoyne (KXC)

MDrouin (MXD)

MCThadani (MCT)

GWMorris (GWM2)

YGHsii (YGH)

DHShum (DHS)

RKMathew (RKM)

GWParry (GWP)

ABWang (ABW)

BMPham (BMP)

AJHowe (AJH1)

TWAlexion (TWA)

MAStutzkie (MAS7)

**SUMMARY OF THE APRIL 21, 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 April 21, 2005, from 9:00 a.m. to 4:30 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 in the order in which they were discussed.

Initiative 1, TS Actions End States Modifications: The CE TSTF-422 will be published in the Federal Register requesting public comment in May 2005 (70 FR 23238, May 4, 2005), as part of the Consolidated Line Item Improvement Process (CLIP). NEI will provide a final version of the implementation guidance for BWR TSTF-423, and its model SE will be published in the Federal Register, requesting public comment in about June 2005, as part of CLIP. The staff has commenced review of the B&W Topical Report RAI Responses. The WOG will submit its Topical Report in July 2005.

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 submitted an Initiative 5b methodology document in February 2005. The staff provided RAIs on Limerick's proposed pilot plant license amendment and the Initiative 5b methodology. In early June 2005 the staff and industry will meet to discuss the RAIs.

Initiative 8 a and 8b, Remove/Relocate non-safety and non-risk significant systems from TS that do not meet 4 criteria of 10 CFR 50.36: Initiative 8a would review tech specs to remove systems that were included solely because they were judged to be risk significant at one time and have now been shown by analysis not to be. The RITSTF will develop a white paper on Initiative 8a, outlining the guidance and methodology for implementation. Initiative 8b would make the scope of technical specifications depend only on risk significance. The RITSTF will interface with the NRC in the development of guidance and a methodology, based on NEI 00-04 (proposed NEI Option 2 implementing guidance), for the application of 10 CFR 50.36 criteria. The RITSTF will develop and submit a white paper on Initiative 8b guidance and methodology for implementation.

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 RAIs for CE TSTF-426 on November 13, 2004. Industry will provide RAI responses and develop implementation guidance in May 2005.

Initiative 7, Non-TS support system impact on TS operability determinations: The staff will resolve issues related to the public comments received in response to the Federal Register Notice (69 FR 68412, November 24, 2004) and make TSTF-372, Inoperable Snubbers, available via CLIP in May 2005 (70 FR 23252, May 4, 2005). The industry provided draft implementation guidance for TSTF-427, Inoperable Barriers, on September 20, 2004. The staff

provided RAIs for TSTF-427 on November 13, 2004. Industry responded to the staff's RAIs on the proposed TSTF-427 implementation guidance on March 23, 2005. Staff and industry will meet in the near future to resolve RAI issues, with a goal of publishing a CLIIP model SE for public comment by August 2005.

Initiative 4a, CT/AOT Extensions: BWR TSTF-454 PCIV CT Extension draft SE is to be issued for public comment in May 2005 via CLIIP. WOG TSTF-446 CIV CT Extension draft SE is to be issued for public comment in June 2005 via CLIIP. The WOG will request a meeting to discuss future RG 1.177 submittals.

Initiative 4b, Risk Informed CTs/AOTs: The industry and staff met in March 2005 to begin defining RMTS Initiative 4b requirements with respect to PRA and CRMP scope and capability. This RITSTF meeting included a continuation of that earlier meeting, with discussions focusing on I4b processes (Enclosure 5). NEI provided a point paper on the nexus between I4b and Initiative 6, on LCO 3.0.3 entry times, and its relationship on how I4b might treat a TS system loss-of-function (Enclosure 6). In general, it is perceived that a voluntary TS system loss-of-function will not be permitted, and that time to restore an emergent TS system loss-of-function will be determined on a system-by-system basis. Also discussed was the interrelationship between TS Operability and PRA functionality. It is recognized that the overwhelming majority of time the two will be identical, however, there will be instances where the two will diverge. The Risk Management Guidance (RMG) document must clearly address constraints and how the situation will be handled when the two are not the same. The industry and staff will meet again to continue defining RMTS Initiative 4b requirements with respect to PRA and CRMP scope and capability, and overall process. The industry will provide an updated RMTS RMG document, CE topical report and TSTF-424, in May 2005. The staff will provide RAIs on the STP pilot LAR in May 2005. The staff will be developing a TI for providing inspection guidance, to be available this summer for comment. The ACRS has requested a meeting, scheduled for June 15, 2005, to discuss the quality and use of PRA and Risk Monitors in the Initiative 4b application. Industry and the NRC staff will provide ACRS with a joint presentation on PRA and CRMP tools.

The next NRC TSS/NEI RITSTF meeting is scheduled for August 17, 2005, at the NRC Headquarters.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
APRIL 21, 2005

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
TONY PIETRANGELO	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	RITSTF/EXCEL SERVICES
JOHN GAERTNER	EPRI
JIM ANDRACHEK	WESTINGHOUSE/WOG
STANLEY LEVINSON	AREVA
WAYNE HARRISON	STP NOC
DREW RICHARDS	STP NOC
GARY CHUNG	SCE
MARK RIEMER	FENOC
MIKE KITLAN	DUKE ENERGY
JIM LIMING	ABS CONSULTING
MICHAEL ADELIZZI	PPL SUSQUEHANNA
DEANN RALEIGH	SCIENTECH
TOM BOYCE	NRC/NRR/DIPM/IROB/TSS
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
NANCY SALGADO	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
NICK SALTOS	NRC/NRR/DSSA/SPSB
ANDREW HOWE	NRC/NRR/DSSA/SPSB

AGENDA
TSS/NEI RITSTF MEETING
APRIL 21, 2005
9:00 A.M. - 4:30 P.M.
0-12 B4

- Status of Initiatives
 - Initiative 1, End States
 - CEOG TSTF-422 Status
 - BWROG TSTF-423 Status
 - B&W Topical, BAW-2441
 - 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, CLIP Status
 - TSTF-427 Status
- Public Questions and Discussion
 - Initiative 4a, Generic RG 1.177 Completion Time Extensions
 - Initiative 4b, Risk-Informed Completion Times
 - STP Pilot
 - FCS Pilot
 - CE Pilot, TSTF-424
 - Hope Creek Pilot
 - Prairie Island Pilot
- Public Questions and Discussion
 - Initiative 4b, Risk-Informed Completion Times
 - RMTS Risk Management Guidance Document
 - ACRS Sub-Committees Meeting on PRA/CRM Monitors/Tools; June 15, 2005
- Public Questions and Discussion
- Schedule Next Meeting

**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	NRC plans to issue CLIP Notice for Comment for TSTF- 422 in April and TSTF-423 in May 2005.	<p>NRC/Industry met 1/30/04 on TSTF-422 and TSTF-423. The NRC/RITSTF agreed to resolutions for all the NRC comments.</p> <p>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 was submitted to the NRC on 9/21/04.</p> <p>The NRC provided comments on the TSTF-422 implementation guidance on 10/13/04. The final TSTF-422 implementation guidance was submitted to the NRC in 12/04.</p> <p>NRC plans to issue TSTF-422 Notice for Comment in May 2005.</p> <p>NRC plans to issue TSTF-422 for Notice for Availability in August 2005.</p> <p>TSTF-423 was submitted to the NRC on 8/12/03.</p> <ul style="list-style-type: none"> RITSTF provided draft responses to NRC comments on TSTF-423 at the 1/30/04 meeting. <p>The NRC provided comments on TSTF-423 and the implementation guidance on 10/13/04. The RITSTF provided responses and revised implementation guidance in 12/04.</p> <p>NRC plans to issue TSTF-423 Notice for Comment in June 2005.</p>	<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>

Enclosure 4

NEI RITSTF

NEI	Biff Bradley	202 739-8083	WOG	Jack Stringfellow, Southern Nuclear	205 992-7037	CEOG	Alan Hackcrott, OPPD	402 533-7276
	Tony Pictrangelo	202 739-8081		Jim Andrachek, Westinghouse	412 374-5018		Gary Chung, SCE	949 368-9431
TSTF	Donald Hoffman, EXCEL	301 984-4400		Jerry Andre, Westinghouse	412 374-4723		Ray Schneider, CE	860 731-6461
EPRI	Frank Rahn	650 855-2037	BWOG	Paul Infanger, Progress Energy	352 563-4796	BWROG	Fred Emerson, GE	
	John Gaertner	704 547-6169		Stanley Levinson, Framatome	434 832-2768		Dusty Rhoads, Energy Northwest	509 377-4298
				Mike Kitlan, Duke	980 373-8348			

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
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. • Revisions are needed to clarify the implementation guidance. The TSTF will provide the proposed changes to NEI in the second quarter of 2005. 	TSTF-359 R9
4a	Individual Risk Informed Completion Times	<ul style="list-style-type: none"> • Owners Groups (OGs) are pursuing generic Risk Informed Completion Time extensions through OG-specific Topicals and license amendments. 	<ul style="list-style-type: none"> • Ongoing. • TSTF-373R2 approved on 2/27/04. • TSTF-430R0 approved on 8/5/04. • NRC to issue TSTF-446 FRN Notice for Comment in 05/05. • NRC to issue TSTF-454 FRN Notice for Comment in 5/05. 	TSTF-373 R2 (CEOG) TSTF-409 R1 (CEOG) TSTF-417 R0 (WOG) TSTF-430 R0 (BWOOG) TSTF-439 R1 (ALL OG) TSTF-446 R0 (WOG) TSTF-454 R0 (BWROG)

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
4b	Risk Informed Completion Times With Configuration Risk Management Program or Maintenance Rule Backstop	<ul style="list-style-type: none"> • Hope Creek, Fort Calhoun, South Texas Project, and Prairie Island have volunteered to develop pilot submittals. • Fort Calhoun and South Texas Project have submitted their pilots. • The RITSTF is working to resolve the NRC's comments on the Risk Management Guidelines, the STP submittal, and the Traveler. • Action – Add description of Pilots 	<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 will provide to NRC in 4/05. • 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. • The RITSTF provided responses to the NRC and met to discuss these responses on 12/15/04. • NRC visited STP week of 1/18/05 to evaluate applications of Initiative 4b. • NRC and RITSTF met 3/17-18/05 to discuss policy issues. There will be another policy meeting 5/3-5/4, 2005. NRC will issue meeting summaries of these meetings. • The RITSTF is to provide a revised Risk Management Guideline document incorporating the results of the discussions by early 6/2005. • The NRC has requested that half of the April 21 RITSTF meeting be dedicated to Initiative 4b comments. • The NRC is reviewing the STP responses on the STP Pilot and will provide formal comments in 4/05. 	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 9/05. 	None assigned

RITSTF INITIATIVE STATUS

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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 6/11/04. • TSTF-425 was submitted to the NRC on 8/31/04. • NEI provided the formal methodology document to the NRC on 2/3/05. • NRC reviewed the Limerick LAR, TSTF-425, and the methodology document and issued RAIs 4/12/05 to the RITSTF. • A separate subcommittee is being formed by the RITSTF in response to the NRC's RAIs and will have a meeting specific to Initiative 5b with the NRC. • The remaining RAIs should come out in early May 2005. • Meeting with NRC is scheduled for 6/1/05. 	TSTF-425 R0
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

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
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 8/30/04. 	<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. • NRC provided an RAI on TSTF-426 on 11/13/04. • The TSTF has developed Implementation Guidance and responses to the NRC's RAIs and will provide these to the NRC in 5/05. • NRC plans to issue Notice for Comment July 2005. 	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 8/30/04. 	<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. • NRC provided an RAI on TSTF-426 on 11/13/04. • The TSTF has developed Implementation Guidance and responses to the NRC's RAIs and will provide these to the NRC in 5/05. • NRC plans to issue Notice for Comment July 2005. 	TSTF-426 R0

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
7a	Impact of Non Technical Specification Design Features on Operability Requirements - Barriers	<ul style="list-style-type: none"> • The NRC plans to issue the FRN Notice for Comment on TSTF-372, Rev. 4 in 3/05. • NRC provided comments on TSTF-427 on 11/13/04. 	<ul style="list-style-type: none"> • The NRC published the FRN Notice for Comment on TSTF-372 on 11/24/04. • The TSTF provided comments on the FRN Notice for Comment on 1/10/05. • 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 early May 2005. • 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 was provided to the NRC on 09/21/04. NRC provided comments on the draft guidance on 10/13/04. • NRC provided an RAI on TSTF-427 on 11/13/04. • RITSTF provided responses to the NRC's RAIs on 3/23/05. The TSTF will provide a revision to TSTF-427 after completion of NRC review of the implementation guidance document and acceptance of the resolution of the NRC's RAIs. • NRC is reviewing the RITSTF responses. • Plan is to resolve the technical issues by late June 2005 and issue Notice for Comment late July/early August 2005. 	<p>TSTF-372 R4</p> <p>TSTF-427 R0</p>

RITSTF INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
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 6/05. • 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 12/05. 	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 third quarter 2005. 	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"> • 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

**DISCUSSION TOPICS FOR APRIL 21, 2005, RITSTF MEETING ON
INITIATIVE 4B RISK MANAGEMENT GUIDANCE DOCUMENT**

- Loss-of-Function/LCO 3.0.3 I4b treatment; Industry to provide white paper
- Operability vs Functionality / treatment of degradation / CCF: defined in RMG
- Application of contingency plans, compensatory actions, and risk management actions
- Process issues: i.e., actions following emergent events; shutdown; etc.
- Is a risk ALARA rule/requirement appropriate?
- Referencing RMG in TS is necessary in Admin Controls Program
- Uncertainty considerations / bounding assessments
- other issues

Deferred items to May 3 & 4 Meeting with industry

- Risk Metric requirements; what are they and are they needed in TS
- Cumulative risk criteria, quantitative risk criteria

White Paper

Interface of RITSTF Initiative 4b and Initiative 6b/6c

The Risk Informed Technical Specification Task Force (RITSTF) currently has several Risk Informed Initiatives in progress including Initiative 4b, “Risk Informed Completion Times With Configuration Risk Management Program or Maintenance Rule Backstop” and Initiative 6b/6c, “Provide Conditions in the LCOs for Those Levels of Degradation Where No Condition Currently Exists to Preclude Entry Into LCO 3.0.3” / “Provide Specific Times in the LCO For Those Conditions That Require Entry Into LCO 3.0.3 Immediately.”

Initiative 4b provides for extending the Completion Time beyond the existing Completion Time (known as the “front stop” Completion Time) for up to 30 days based on risk evaluations demonstrating the acceptability of this Risk Informed Completion Time (RICT) or extended Completion Time. The 30 day limit is known as the “back stop” Completion Time. This concept is currently envisioned to be applicable to all Conditions and the risk evaluation will govern whether or not part or all of the RICT may be utilized.

Initiative 6b/6c provides Required Actions and Completion Times for those levels of degradation where no Condition is provided or where the Required Action is to enter LCO 3.0.3 immediately. Many of the Conditions added by this Initiative represent a loss of safety function for the respective LCO. A loss of safety function is considered a condition in which the safety function provided by the structure, system, or component (SSC) cannot perform its specified safety function absent a single failure.

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EXAMPLE 1

Assume a two train safety system.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One train inoperable.	A.1 Restore train to OPERABLE status.	72 hours
B. Two trains inoperable	B.1 Restore at least one train to OPERABLE status.	24 hours
C. Required Action or associated Completion Time not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Be in MODE 5.	36 hours

In general, there are three types of Conditions. The first type of Condition represents a level of degradation with respect to the LCO, but the subject SSC can still perform its specified safety function assuming a single failure affecting the SSC does not occur. A typical example is Condition A of Example 1. The second type of Condition represents a level of degradation with respect to the LCO and the SSC cannot perform its specified safety function. An example is Condition B of Example 1. The third type of Condition provides the Required Actions to be followed if other Required Actions or their associated Completion Times are not met. This is called the default Condition and is illustrated by Condition C of Example 1.

Required Action A.1 of Example 1 has a 72 hour Completion Time. Under Initiative 4b, the 72 hour Completion Time is the front stop Completion Time. Initiative 4b would add a second back

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stop Completion Time of 30 days. The Required Actions would also be modified to require a contemporaneous evaluation of plant risk and use of all or part of the 30 day back stop Completion Time would be dependant on an acceptable level of plant risk.

Condition B of Example 1 is typical of the Action added by Initiative 6b/6c. Prior to Initiative 6b/6c, this Condition – which represents a loss of function for the SSC that is the subject of the LCO – either would not have existed or would have directed immediate entry into LCO 3.0.3. Initiative 6b/6c demonstrated that in many cases the risk associated with this type of loss of safety function Condition did not warrant the immediate shutdown directed by LCO 3.0.3.

The RITSTF believes that the 30 day back stop Completion Time of Initiative 4b should be applied to the Conditions added or modified by Initiative 6b/6c or similar existing Conditions. The contemporaneous risk assessment required by Initiative 4b will dictate whether operation beyond the front stop Completion Time is permitted. Initiative 6b/6c has already demonstrated that the plant conditions represented by the modified Actions represent low risk configurations. It is appropriate to utilize those insights to allow continued plant operation up to the back stop Completion Time if the configuration continues to represent low plant risk

The RITSTF does not believe that the 30 day back stop Completion Time of Initiative 4b should be applied to the default condition, as illustrated by Condition C in Example 1. The default Condition is entered if either the Required Actions cannot be performed or if the Completion Time has been exceeded. The most common reason for entering the default Condition is the expiration of the Completion Time of the other Required Actions. If Initiative 4b is applied to the other Conditions

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(for example, Conditions A and B of Example 1), then either the plant risk does not support continued use of the Completion Time beyond the front stop Completion Time or the 30 day back stop Completion Time has been reached. In either case, providing an additional 30 day risk informed back stop Completion Time is not appropriate because it either could not be justified by plant risk or would represent an extension of the 30 day back stop Completion Time of the other Conditions.

Conclusion

It is appropriate to apply the Initiative 4b back stop Completion Time concept to Conditions added or modified by Initiative 6b/6c and to allow the contemporaneous risk assessment to manage plant risk to acceptable levels. The RITSTF does not support applying the Initiative 4b back stop Completion Time concept to default Conditions.