

June 16, 2005

Mr. Brian D. Mann
Technical Specifications Task Force
11921 Rockville Pike, Suite 100
Rockville, Maryland 20852

SUBJECT: COMMENTS ON PROPOSED U.S. NUCLEAR REGULATORY COMMISSION
(NRC) REVIEW PROCESS FOR T-TRAVELERS

Dear Mr. Mann:

In the meeting with the U.S. Nuclear Regulatory Commission (NRC) staff on January 26, 2005, the Owners Group (OG) technical specifications task force (TSTF) proposed an NRC review process for OG-approved travelers that are not chosen for submission to the NRC using the existing traveler review and approval processes. Each such traveler is referred to as a "T-traveler" because an uppercase letter "T" is appended to its numerical designation. The attachment to this letter contains Technical Specifications Section (TSS) staff comments on the TSTF's proposal.

For the first plant applying to adopt a particular T-traveler, the proposed process expects that the licensee or its sponsoring OG would incur the fees associated with NRC review of both the plant-specific and standardization aspects of the traveler; i.e., the license amendment and the change to the standard technical specifications. We have a concern that the NRC resources for reviewing the standardization aspect may exceed the licensee's or OG's expectations. We propose to discuss this issue along with the enclosed comments during the next meeting of the TSTF with the NRC staff on June 23, 2005.

Sincerely,

/RA/

Thomas H. Boyce, Section Chief
Technical Specifications Section
Reactor Operations Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc w/encl: See attached page

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NRC Technical Specifications Section (TSS) Comments
on the TSTF Proposed Process for NRC Review of T-Travellers

1. To ensure appropriate NRC staff work control, NRC would issue two TACs to review a T-traveler application under the proposed process; one for the lead plant license amendment and one for the change to the STS. The first TAC for the lead plant amendment would be opened by the plant's assigned Licensing Project Manager (PM) under the NRC budget PA Code 111-102, License Amendments. The second TAC for the STS change would be opened by the TSS assigned reviewer under NRC budget PA Code 111-106, iSTS Program Development. The fees for work under both TACs would be assessed to the lead plant, its supporting owners group, or both as requested in the application letter.

Usually, NRC would assess most fees for reviewing the T-traveler under the TAC for the lead plant amendment. Fees assessed under the TAC for the STS change would derive from processing the T-traveler using the Consolidated Line Item Improvement (CLiIP) process. Fees usually result from public comments and development of a model application and safety evaluation (SE).

TSS believes that a process should be established to manage or control the costs of the NRC staff's review of the STS change. For example, instead of responding to RAIs deemed excessive, the lead plant licensee or owners group may decline to respond and withdraw the T-traveler.
2. For further discussion: A flow path on the chart is desired to address proposed TS changes that are of low significance or not worthy of a separate TS change, such as administrative changes to the STS. Conceptually, this flow path may not result in a separate safety evaluation (SE), but the change may be adopted during a subsequent revision to the STS. The decision involving the SE and the adoption of the change in the STS Revision is determined by the TSS. Some controls on STS configuration would need to be put into place.
3. In the first introductory paragraph of the proposed process description, it is recommended to remove the sentence beginning with (However, a limited number of Travelers.....).
4. In the second introductory paragraph of proposed process, regarding the phrase, ".....NRC generic approval of the change without incurring significant additional review fees to the licensee." The statement is only true if the lead plant application is actually representative of most other plants, or at least most plants with the same NSSS supplier. In order to prevent significant unanticipated costs to the lead plant licensee or owners group, TSS believes that the some sort of process should be established to control the fees associated with the review of the STS change (see comment #1.)
5. In Item 4 of the proposed process description, it is recommended to remove second sentence and add a sentence that references cost limitations for the lead plant licensee (see comment #1.).
6. NRC Approved T-travelers should become A-travelers.
7. To limit the cost of reviewing the STS change, the lead plant approved version of the T-traveler (including plant specific deviations from the traveler as posted on the EXCEL Services web site) should become the officially approved TSTF with a suffix "A", but with its plant specific provisions denoted by square brackets. The NRC staff's SE for the STS change should reflect the plant-specific application and provisions, as well as the generic provisions, with no attempt to generalize the plant-specific issues.

Enclosure

8. OG review of changes to a T-traveler resulting from NRC comments could significantly delay approval of the T-traveler. It is recommended the process address this with more specificity on timeliness of OG review of a revision to a T-traveler.
9. Although the proposed process cannot prevent this, it is recommended that there be only one lead plant for each T-traveler; i.e., only one facility should apply to initially adopt a particular T-traveler at a time. This limitation will promote efficiency and conservation of industry and NRC resources. Once a T-traveler is approved for the lead plant, in most cases as a CLIP, it should become an A-Traveler, which could then be adopted by other plants.