

September 6, 2005

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

SUBJECT: SUMMARY OF MEETING ON AUGUST 17, 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 (RITSTF). The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on August 17, 2005. Since the last meeting in April 2005, the Risk Management Technical Specifications (RMTS) Initiative 1 TSTF-423 (Modified End States for Combustion Engineering Plants) and Initiative 7 TSTF-372 (Inoperable Snubbers) have been made available to licensees via the Consolidate Line Item Improvement Process.

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. RMTS Initiative 4b Risk
Management Guidance Document, Revised 8/05

cc w/encl: See next page

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DATE	09/06/2005	09/06/2005		

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RidsNrrDipmlehb

RidsOgcRp

RidsAcrsAcnwMailCenter

NSaltos (NTS)

MLWohl (MLW1)

GSShukla (GSS)

SPWall (SPW)

WDReckley (WDR)

FMReinhart (FMR)

DGHarrison (DGH)

CKDoutt (CKD)]

DFThatcher (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)

DHJaffe (DHJ)

LAMrowca (LXM4)

JAVail (JAV)

Mr. Biff Bradley

cc via e-mail:

Mr. Tony Pietrangelo
Nuclear Energy Institute

Mr. Biff Bradley
Nuclear Energy Institute

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 AUGUST 17, 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 August 17, 2005, from 9:00 a.m. to 12:45 p.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of discussions of the Risk Management Technical Specifications (RMTS) 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 notice of availability for licensee adoption was published in the Federal Register (70 FR 38729, July 5, 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, after final issues are resolved. The TSTF-423 model SE will subsequently be published in the Federal Register, requesting public comment as part of CLIP, in September 2005. The staff has commenced review of the B&W Topical Report RAI Responses. The WOG will submit its Topical Report in September 2005.

Initiative 4a, CT/AOT Extensions: The BWR TSTF-454 PCIV CT Extension draft SE was issued for public comment on May 25, 2005, via CLIP, and the TSTF provided comments on July 25, 2005. The TSTF is revising TSTF-454. Staff review of WOG TSTF-446 CIV CT Extension draft SE is to be issued for public comment in the near future. STP submitted a license amendment request for CT extensions to the Essential Cooling Water System and various supported systems; it is a non-generic change. This proposed change needs to be considered in conjunction with the proposed RMTS I4b change.

Initiative 4b, Risk Informed CTs/AOTs: The staff provided RAIs on the STP pilot LAR on May 31, 2005. On July 12 and 13, 2005 the staff and STP discussed the RAIs; STP intends to respond to the RAIs in the 1st quarter of FY 2006. The industry and staff will continue to work to define RMTS Initiative 4b requirements with respect to PRA and CRMP scope and capability, and overall process. The industry provided an updated RMTS RMG document at the RITSTF meeting. The industry will provide an updated CE topical report and TSTF-424. The staff will be developing a TI for inspection guidance. The industry and staff will meet again in about one month to continue RMG guidance document discussions and to continue defining RMTS Initiative 4b requirements with respect to PRA and CRMP scope and capability, and overall process.

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. The licensee will provide RAI responses in September 2005. The methodology document will be enhanced.

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 provided RAI responses on April 27, 2005, and updated implementation guidance in August 2005. NRC will issue notice requesting public comment in the near future.

Initiative 7, Non-TS support system impact on TS operability determinations: The staff made TSTF-372, Inoperable Snubbers, available via CLIP (70 FR 23252, May 4, 2005). 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 are working to resolve RAI issues. Industry will submit a revised TSTF-427 and associated implementation guidance in October 2005.

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, for submittal in the fourth quarter of CY 2005. 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.

The next NRC TSS/NEI RITSTF meeting is to be determined.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
AUGUST 17, 2005

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	RITSTF/EXCEL SERVICES
JIM ANDRACHEK	WESTINGHOUSE/WOG
STANLEY LEVINSON	AREVA
WAYNE HARRISON	STP NOC
RICK GRANTOM	STP NOC
RAY SCHNEIDER	WESTINGHOUSE
MIKE KITLAN	DUKE ENERGY
JIM LIMING	ABS CONSULTING/EPRI
MICHAEL ADELIZZI	PPL SUSQUEHANNA
NORMAN STRINGFELLOW	SNC
STEVEN DOLLEY	PLATTS
NANCY CHAPMAN	SERCH/BECHTEL
TOM BOYCE	NRC/NRR/DIPM/IROB/TSS
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
DAVID ROTH	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
ANDREW HOWE	NRC/NRR/DSSA/SPSB
JIM VAIL	NRC/NRR/DSSA/SPSB
LYNN MROWCA	NRC/NRR/DSSA/SPSB
GEORGE MORRIS	NRC/NRR/DE/EEIB
JOHN G. LAMB	NRC/ACRS STAFF

AGENDA

TSS/NEI RITSTF MEETING

AUGUST 17, 2005

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

O-12 B4

1. Status of Initiatives
 - Initiative 1, End States
 - BWROG TSTF-423 Status
 - B&W Topical, BAW-2441
 - Initiative 5b, SR Frequency Evaluation Methodology/SR Frequency TS Program
 - Limerick Pilot Status/RAI Response 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; CLIP Notice for Comment Status
 - Initiative 7, Non-TS Support System Inoperability Impact on TS System & TSTF-372
 - TSTF-427 Status; CLIP Notice for Comment 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
 - RMTS Risk Management Guidance Document
2. Public Questions and Discussion
 - Schedule Next Meeting
 - Closing Comments