

**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"> NRC issued the CLIP Notice of Availability for TSTF-422 on July 7, 2005. NRC plans to issue CLIP Notice for Comment for TSTF-423 in September 2005. 	<ul style="list-style-type: none"> NRC issued the TSTF-422 Notice of Availability on July 7, 2005. TSTF-423 was submitted to the NRC on 8/12/03. BWROG working with NRC to address one issue for the Implementation Guidance regarding time to stay above 500 psig in MODE 3. The TSTF will submit the final TSTF-423 implementation guidance in September 2005. NRC plans to issue TSTF-423 Notice for Comment in September 2005. TSTF-431 was distributed to the BWOG and the RITSTF for review on 7/11/04. BWOG Topical Report (BAW-2441) was submitted to NRC on 1/19/04. The NRC provided RAIs on 6/29/04. The BWOG responded to the RAIs in 2/05. NRC is currently reviewing the BWOG RAI responses. NRC plans to issue Notice for Comment for TSTF 431 by 12/05. WOG plans to submit their Topical in 9/05. 	<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>

NEI RITSTF

NEI	Biff Bradley	202 739-8083	WOG	Jack Stringfellow, Southern Nuclear	205 992-7037	CEOG	Alan Hackerott, OPPD	402 533-7276
	Tony Pietrangelo	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			

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2	Missed Surveillances SR 3.0.3	<ul style="list-style-type: none"> • TSTF-358, R6, has been approved and published for CLIIP adoption. 	<ul style="list-style-type: none"> • Initiative Complete. • TSTF and RITSTF will issue implementation guidance in the fourth quarter of 2005. 	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 CLIIP 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 and RITSTF will revise and reissue the implementation guidance in the fourth 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 issued the TSTF-454 FRN Notice for Comment on 5/25/05. The TSTF provided comments on 7/25/05. The TSTF is preparing a revision to TSTF-454 to reflect the NRC-approved Topical Report. • TSTF-439R2 was submitted to the NRC on 6/20/05. • The NRC expects to issue the TSTF-409R1 CLIIP Notice for Comment in August 2005. • The NRC expects to complete their review of the Topical Reports that support TSTF-417R0 and TSTF-446R0 in August 2005. Review of the Travelers will follow approval of the Topical Reports. 	TSTF-373 R2 (CEOG) TSTF-409 R1 (CEOG) TSTF-417 R0 (WOG) TSTF-430 R0 (BWOG) TSTF-439 R2 (ALL OG) TSTF-446 R0 (WOG) TSTF-454 R0 (BWROG)

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4b	Risk Informed Completion Times With Configuration Risk Management Program or Maintenance Rule Backstop	<ul style="list-style-type: none"> • 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. 	<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 and 5/3-5/4, 2005 to discuss policy issues. NRC will issue meeting summaries of these meetings. • NRC will provide comments on the RMTS Guidelines by late 9/05. • The RITSTF has revised the draft Risk-Managed Technical Specifications (RMTS) Guidelines document incorporating the results of the discussions with the NRC. The revised draft RMTS document was provided to the NRC at the August RITSTF/NRC meeting. • NRC will provide comments on the draft RMTS to RITSTF in 9/05. 	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 Traveler to the NRC by 6/06. 	None assigned

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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"> • 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 was formed by the RITSTF to respond to the NRC's RAIs. • The 5b subcommittee met with the NRC on June 3 to discuss the RAI responses. • The RITSTF plans to respond to the RAIs in September, 2005. 	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

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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 will provide it to the NRC in 8/05. • The TSTF provided responses to the NRC's RAIs on 4/27/05. • The TSTF 426 Implementation Guidance was provided to NRC in early 8/05. • NRC plans to issue the Notice for Comment in September 2005. 	TSTF-426 R0

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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 will provide it to the NRC in 8/05. • The TSTF provided responses to the NRC's RAIs on 4/27/05. • The TSTF 426 Implementation Guidance was provided to NRC in early 8/05. <p>NRC plans to issue the Notice for Comment in September 2005.</p>	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"> • The NRC issued the FRN Notice of Availability for TSTF-372, Rev. 4 on 5/4/05. • RITSTF to respond to NRC comments on the TSTF-427 implementation guidance. 	<ul style="list-style-type: none"> • The NRC published the FRN Notice of Availability for TSTF-372 on 5/4/05. • NRC provided feedback on RITSTF responses on TSTF-427 in February 2004. • TSTF 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 NRC provided additional questions on the TSTF-427 implementation guidance in a letter dated June 2, 2005. RITSTF to respond. • Members of the TSTF & RITSTF met with the NRC on 7/28/05 to discuss NRC comments. The TSTF is preparing a revision of TSTF-427 to be submitted to the NRC in October 2005. • There was discussion of the LCO 3.0.9 that requires revision. The RITSTF will develop changes to LCO 3.0.9 and TSTF 427 Implementation Guidance to address the barrier that affects both trains of a system <u>and</u> the emergent condition of 1 barrier that affects 1 train and the second train becomes inoperable for another reason. • The revised implementation guidance and revised TSTF-427 will be distributed to the RITSTF for review in September for submittal to the NRC in October 2005. 	TSTF-372 R4 TSTF-427 R0

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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 in 9/05. 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 6/06. 	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 fourth 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