

January 17, 2006

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SUBJECT: SUMMARY OF MEETING ON DECEMBER 14 & 15, 2005, WITH SOUTH TEXAS PROJECT (STP) AND NEI/EPRI REPRESENTATIVES TO DISCUSS THE RISK MANAGEMENT TECHNICAL SPECIFICATIONS (RMTS) INITIATIVE 4b, RISK-INFORMED COMPLETION TIMES, STP PILOT EFFORT

Dear Mr. Bradley and Mr. Head:

The purpose of this letter is to transmit the summary of a meeting with STP and NEI/EPRI representatives to discuss the STP pilot proposal for RMTS Initiative 4b, on Risk-informed Completion Times (RICT). The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland on December 14 and 15, 2005.

Sincerely,

*/RA/*

T. R. Tjader, Senior Reactor Engineer  
Technical Specifications Branch  
Division of Inspection & Regional Support,  
Office of Nuclear Reactor Regulation

Enclosures:

1. Meeting Summary
2. Attendance List
3. STP Meeting Vu-graphs
4. STP Responses to Staff RMTS Initiative 4b Requests for Additional Information (RAIs)

cc: See attached page

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ADAMS ACCESSION NUMBER: MI060230241

DOCUMENT NAME: G:\ITSB\TJADER\MTG-Sum-STP-12-14&15-05.wpd

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SPWall (SPW)

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METonacci (MET)

SUMMARY OF THE DECEMBER 14 & 15, 2005 MEETING WITH  
SOUTH TEXAS PROJECT ON THE PILOT EFFORT FOR  
RISK MANAGEMENT TECHNICAL SPECIFICATIONS INITIATIVE 4b

The NRC staff met with South Texas Project (STP) representatives on December 14 & 15, 2005, to discuss their pilot proposal for Risk Management Technical Specifications (RMTS) Initiative 4b on Risk-informed Completion Times (RICT). The meeting attendees are listed in Enclosure 2.

STP provide vu-graphs (Enclosure 3) to facilitate discussions of their RMTS I4b proposal. The agenda (page 4 of Enclosure 3) consisted of discussions of: the STP responses (Enclosure 4) to the NRC Staff requests for additional information to the STP August 2, 2005 license amendment request; completion of the RMTS Guidelines/process for RMTS Initiative 4b determination of RICTs, which is on the critical path for approving the pilot application; and, milestones and schedule for approving the STP pilot proposal. Following are brief descriptions of the significant topics discussed during the meeting.

The NRC Staff RAIs were thoroughly discussed and resolutions were accepted. The industry, NEI/EPRI generated, Risk Management Guidance (RMG) Document will require significant revision to reflect RICT process, detail, and organizational improvements. The necessary changes to the RMG are to be consistent with the STP pilot process and to reflect NRC comments/input. The STP license amendment request (LAR) will also require modification to be acceptable for approval. Enclosures 3 and 4 include the staff RAIs and proposed resolutions. Some of the areas of the RMG and the STP LAR requiring significant revision are: organization, clarity and redundancy; qualitative versus bounding risk assessments; RICT limit thresholds; treatment of common cause failure; treatment of uncertainties; response to emergent conditions; application of functionality and degraded conditions; documentation requirements; training/qualification requirements; and PRA/Configuration Risk Management Tool requirements. It is envisioned that the RMG document, and in particular its associated requirements, will be incorporated by reference into the Administrative Controls Section of the plants technical specifications, thereby making its requirements enforceable through the Technical Specifications.

Schedule requirements were addressed. Below is a table that lists the significant milestones to be achieved in order to be able to approve the pilot application. Items related to inspection and enforcement that need to be completed are not listed, such as preparation of inspection procedures for implementation of Initiative 4b, ensure the SDP adequately addresses Initiative 4b, and staff training/preparation for implementation of Initiative 4b.

<b><u>ACTION</u></b>	<b><u>DATE</u></b>	<b><u>RESPONSIBILITY</u></b>
Submit revised RMG Document & docket RAI responses (w/o PRA responses)	31 Jan 06	STP/NEI
Hold meeting to resolve remaining RMG open items	22 Feb 06	Industry/NRC staff
Submit/docket PRA RAI responses w/revised Table 2	6 Mar 06	STP
Submit revised LAR	16 Mar 06	STP
NRC Staff conduct site visit to determine PRA & CRM Tool adequacy for I4b/RICT application: engage regions and RI's in developing and implementing TI.	Mar-Apr 06	NRC
Submit final RMG Document	6 Apr 06	NEI
Brief ACRS on status of I4b Pilot application	Apr-Jun 06	NRC/Industry
Complete STP LA SE (incl/addressing RMG in SE)	6/30/06	NRC
Issue STP Pilot LA	7/31/06	NRC
Ensure TI/SDP in place addressing I4b Pilot	7/31/06	NRC

ATTENDEES TO THE DECEMBER 14 & 15, 2005 MEETING WITH  
SOUTH TEXAS PROJECT ON THE PILOT EFFORT FOR  
RISK MANAGEMENT TECHNICAL SPECIFICATIONS INITIATIVE 4b

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WAYNE HARRISON	STP NOC
RICK GRANTOM	STP NOC
DREW RICHARDS	STP NOC
BILL STILLWELL	STP NOC
EVANS HEACOCK	STP NOC
JIM MORRIS	STP NOC
JOHN GAERTNER	EPRI
STEPHEN HESS	EPRI
ANDREW DYKES	ABS CONSULTING
PAT HILAND	NRC/NRR/ADRO/DIRS
MIKE TSCHILTZ	NRC/NRR/ADRA/DRA
T. R. TJADER	NRC/NRR/ADRO/DIRS/ITSB
ANDREW HOWE	NRC/NRR/ADRA/DRA/APLB
JIM VAIL	NRC/NRR/ADRA/DRA/APLB
GEORGE MORRIS	NRC/NRR/ADES/DE/EEEB
DAVID SHUM	NRC/NRR/ADES/DSS/SBPB
BHALCHANDRA VAIDYA	NRC/NRR/ADRO/DORL
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