

February 27, 2006

MEMORANDUM TO: Marc L. Dapas, Deputy Regional Administrator, RI  
Loren R. Plisco, Deputy Regional Administrator, RII  
Geoffrey E. Grant, Deputy Regional Administrator, RIII  
Thomas P. Gwynn, Deputy Regional Administrator, RIV

FROM: Patrick L. Hiland, Deputy Director */RA/*  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: RISK INFORMED TECHNICAL SPECIFICATION DOCUMENTS FOR  
COMMENT

At a recent ROP Friday call Bob Tjader briefed the regions on the Risk Informed Technical Specification project. The NRC staff is currently engaged in a review of pilot plant license amendment requests for two significant Risk Management Technical Specifications initiatives: Initiative 4b, Risk-Informed Completion Times, and Initiative 5b, Surveillance Frequency Determination Program. The approval of these license amendments is dependent upon the successful development of the associated methodology documents which are attached. Formal comment reviews of the attached two documents were requested from the regions during the ROP call.

The comment period for these documents is 30 days. There is an industry meeting on February 28, 2006 at the NRC HQ at 8:30 to discuss Attachment I relating to Initiative 4b. Regional participation in person or by phone is encouraged. The following bridge line is set up for participation on the 28<sup>th</sup>: 1-800-638-8081, pass code number 0380.

Additional relevant information is:

TAC No.:	MB3541
Maximum Review Hours:	18 hrs/region
Comment Response Date:	30 days
Contact Person:	Bob Tjader, <a href="mailto:trt@nrc.gov">trt@nrc.gov</a> , 301-415-1187

CONTACT: Theodore R. Tjader, Sr., DIRS/NRR  
301-415-1187

**Enclosure I, Draft Risk-Managed Technical Specifications (RMTS) Guidelines Technical Update to EPRI Report 1011758**

This document relates to Initiative 4, Risk-Informed Completion Times and use of a configuration risk management program (CRMP). Current technical specifications (TS) contain equipment-specific outage times; known as TS completion times (CTs) and also referred to as allowed outage times (AOTs). The TS contain limiting conditions for operation (LCO) action statements and associated CTs (e.g., if the diesel generator is inoperable, restore within 7 days; if not restored, take actions to proceed to plant shutdown within 24 hours). Current TS address systems independently, and do not generally account for the combined risk impact of multiple concurrent equipment out of service conditions. The maintenance rule configuration risk assessment requirement was added to address this consideration, but does not obviate compliance with current TS requirements. These current TS requirements may present inconsistencies with the maintenance rule requirements, and may require plant shutdown, or other actions, that are not the most risk-effective actions given the specific plant configuration. The overall objective of this initiative is to modify the TS to reflect a configuration risk management approach that is more consistent with the maintenance rule (a)(4) approach. The proposal involves a combination of the current TS CTs, a quantified (a)(4) based risk assessment to determine CT extension feasibility, and CT backstop limits. The CT backstop limits ensure that low risk safety functions are not permitted to be inoperable for an indefinite period of time. This initiative would permit, contingent upon the results of a plant configuration risk assessment, temporary revision of the existing CT within an LCO using a quantitative implementation of 50.65(a)(4).

**Enclosure II, Nuclear Energy Institution NEI-04-10 Draft Rev 2 December 2005**

This document relates to Initiative 5, Surveillance Frequency determination. Current technical specifications provide specific surveillance requirements and surveillance test intervals. Compliance with these requirements are necessary to retain operability of the equipment, and avoid entrance into action requirements. The surveillance requirements address the function of the primary safety systems as well as instrumentation and control logic, etc. The goal of this initiative is to develop a risk-informed process that would establish surveillance intervals based on risk insights, equipment availability and reliability factors, performance history, etc., to determine an "optimum" SR frequency. Upon development and approval of this process, the intent is to retain the existing surveillance requirements in the technical specifications, but to remove the equipment-specific surveillance test intervals. Test intervals would be controlled through the NRC approved process that is defined in the Administrative Controls Section of TS, and contained in a licensee controlled document.

Please provide your comments to Bob Tjader, [trt@nrc.gov](mailto:trt@nrc.gov), 301-415-1187 within 30 days of the date of this memorandum. Your assistance is appreciated.

Enclosures: As stated

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Distribution: See next page.

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