

March 31, 2006

MEMORANDUM TO: Thomas H. Boyce, Chief
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: David E. Roth */RA/*
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF FEB. 23, 2006, CATEGORY 2 MEETING WITH THE
TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TO DISCUSS
TSTF SUBMITTALS, THE CURRENT TSTF TRAVELER PROCESS,
AND HOW TO IMPROVE THE PROCESS.

On February 23, 2006, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC), and representatives of the Technical Specifications Task Force (TSTF) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, MD. The purpose of the meeting was to have the U.S. Nuclear Regulatory Commission (NRC) Technical Specifications Branch meet with industry's TSTF representatives to discuss the status of TSTF Submittals, the current TSTF process, and how to improve the process.

The meeting generally followed the agenda in the meeting notice (ML060390584) as modified by the TSTF (ML060720528). The attendees concluded that improvements in implementing formal procedures for review of TSTF Travelers for modifications to the Standard Technical Specifications are being made. The attendees also concluded that progress is continuing in the adoption of the Consolidated Line Item Improvement Process (CLIIP) for Standard Technical Specifications (STS) changes for operating power reactors using the license amendment process.

The TSTF provided the NRC with the following documents for discussion during the meeting:

- * 2006 February TSTF Meeting Agenda (ML060720528)
- * Updated CLIIP Survey Summary (ML060720524)
- * TSTF 2006 Priorities (ML060720525)
- * Feb. 26, 2006, Monthly TSTF Management Report (ML060720526)

The NRC provided the TSTF with the following documents for discussion during the meeting:

- * LIC-TSTF Draft Rev. 0.2 (ML060590111)
- * Proposed web page for
<http://www.nrc.gov/reactors/operating/licensing/techspecs/post-revision3-sts.html>

(ML060590119)

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To assure that the NRC and the TSTF had a common understanding of issues and action items from the meeting, the TSTF provided the NRC with a draft copy of the TSTF's meeting minutes on 02/28/2006. The NRC reviewed the minutes and identified only minor clarifications. Enclosure 1 contains the minutes with the NRC's corrections incorporated.

Action items where the TSTF or NRC intended to exchange information are identified in the minutes. If dates and/or specific staff were discussed in association with an action item, that information is also provided. If the date or staff information is not present, it is anticipated that those data will be discussed during monthly TSTF status calls.

A list of meeting attendees is in Enclosure 2.

Please direct any inquiries to David Roth at 301-415-2749, or der@nrc.gov.

D. Roth

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Please direct any inquiries to David Roth at 301-415-2749, or der@nrc.gov.

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ADAMS ACCESSION NO: ML060890678

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DATE	03/31/2006	03/31/2006

OFFICIAL RECORD COPY

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Enclosure 1: Meeting Details

The details below were primarily based on the draft minutes provided by the TSTF to the NRC after the meeting. The format of the minutes follows the proposed agenda. The meeting discussed most items in the agenda, but not always in order due to personnel availability.

1. ADMINISTRATIVE ISSUES
 - a. Introductions
 - b. Agenda Review
 - c. Review of Open Items for 10/13/05 Meeting
 - i. Open Items to be addressed through agenda
 - d. Other Administrative Issues
 - i. Feedback on use of EIE submittals
 - (1) Use has been positive
 - (2) System is fast
 - (3) TSTF will continue to use it
 - ii. Including the NRC TSB on Topicals that affect TS
 - (1) Industry will do this
 - (2) **(TSTF Action)** TSTF develop a list of all Topicals that affect TS and the associated TSTF submittal schedule that are currently at NRC or will be submitted in the next year and provide the document to TSB and maintain the document
 - e. Public Participation Invited
2. PROCESS ISSUES
 - a. Review Fee Issues
 - i. TSTF 448
 - (1) Need to ensure submitted revisions to TSTFs that are already fee exempt state so and cite the appropriate reference in the cover letter
 - ii. TSTF 493
 - (1) NRR has requested fee exemption for TSTF 493 and CFO has not yet responded [Subsequently, the NRC granted the fee waiver for TSTF-493. See Letter to W. Sparkman from J. Funches dated 3/2/06, ML060620213]
 - iii. IAW 1/10/03 letter the Risk Informed Initiatives are fee exempt
 - iv. TSTF believes we need to establish a process for all NRC requested Travelers to ensure they are all fee exempt
 - v. Just because the Traveler is risk informed does not mean it is fee exempt – if Topical is fee exempt then the TSTF should be fee exempt
 - (1) NRC believes only a portion of the Initiative 4a TSTFs are fee exempt
 - vi. **(TSTF Action)** TSTF plans to submit a letter to show why all Travelers should be fee exempt
 - (1) Mail the letter to NRR by 4/7/06 – Bruce Boger and OGC with cc to Tom Boyce
 - b. Industry Feedback in Revised NRC Meeting Minutes Format
 - i. TSTF/NRC exchange the meeting minutes after the meeting before formally publishing them
 - ii. Review actions/assignees/schedules at end of meeting

- iii. There needs to be one list of actions for TSTF and one list of actions for NRC
- c. New TS Branch Traveler Review and Approval Process and Procedures
 - i. NRC provided their latest draft – Draft 0.2 of LIC - TSTF
 - ii. TSTF comments
 - (1) The TSTF does not believe the procedure needs to discuss proprietary information. NRC wants to keep the proprietary data portion of the process even though the TSTF believes this complicates the process.
 - (2) The TSTF does not plan to submit "A" Versions of Travelers that include the NRC's Safety Evaluation. NRC will consider deleting the statement
 - (3) TSTF does not believe everything will be CLIIPED – NRC does want everything to be CLIIPable and TSTF agrees with this but TSTF believes the procedure needs clarification because CLIIPable is not the same as CLIIPed. TSTF points to BASES-ONLY changes as examples of items that might not be appropriate for a CLIIP.
 - (4) Issue is timing. CLIIPing a Traveler adds 6 - 9 months before a TSTF is available for plant-specific adoption
 - (5) NRC stated that - if necessary - it is acceptable for a plant to submit a LAR based on a CLIIP once the Notice for Comment has been issued.
 - (6) TSTF believes that timeliness goals should be in the procedure. Regarding timeliness
 - (a) TSB has provided a 2 year metric for TSTFs
 - (b) The plant specific LARs referencing CLIIPs will have a goal of 6 months
 - iii. NRC reviewed their LIC TSTF Revision Draft 0.2 with TSTF
 - iv. Nomenclature
 - (1) Refer to Technical Specification Task Force as TSTF
 - (2) Refer to TSTFs as Travelers
 - v. The "I" in TSB is referring to Inspection for the Inspection Division TSB is in; TSB will change to use TSB or ITSB consistently
 - vi. **(TSTF Action)** TSTF to provide detailed comments on LIC-TSTF by 4/4/06
 - vii. Comments in LIC 101 Section 8
 - (1) Timeliness goals will be addressed
 - (2) The title needs to be changed to something like "Plant Specific LARs based on Generic Changes to the ITS"
 - (3) LIC-101 needs to provide guidance in the level of detail of Justification required for LARs based on adopting Travelers similar to the guidance in NEI 06-02
 - viii. TSB continues to interface with DORL
 - ix. TSTF is continuing to provide comments on NEI 06-02 to ensure there is coordination of the Industry and TSB/NRC processes
 - x. **(TSTF Action)** TSB would like to see the Traveler become the Model Application. This requires some reformatting of the Traveler to outline everything that should be in the plant specific LAR. TSTF to consider how the Traveler could do this

- (1) **(NRC Action)** TSB is developing a Model Application – Eric Thomas provided the draft to TSTF on 3/2/06
 - (2) TSTF 409 will be the pilot for the model
 - (3) There would need to be a model for each new TSTF – the good model application makes the SE very short and easy to process
- d. NRC CLIIP Responsibilities after NRC Reorganization
 - i. TSB has taken over all CLIIP responsibilities
 - ii. Discussed in revision to LIC-101, Section 8
- e. TSB Changes to NRC Website
 - i. NRC is working to make this website live
 - ii. NRC has provided the latest update that will be posted
 - iii. TSTF/NRC should be working together to keep the NRC and TSTF websites up to date and coordinated
 - iv. Need to support the NRC and TSTF websites updates
 - v. **(TSTF Action)** NRC requested that the TSTF formally submit (by EIE) the Monthly TSTF Status Report. TSTF does not want to provide the Monthly TSTF Status Report to NRC as a formal submittal. Instead of e-mailing the Monthly Status Report to the NRC, EXCEL will e-mail a link to the report on the EXCEL website.
 - vi. EXCEL website
 - (1) New website rolled out by end of March
 - (2) First step is the TSTF 493 comment database where we want NRC to do a trial use
 - vii. EXCEL Action: Talk to Frank Gillespie and Dave Matthews about Website for COL/LR/EPU License Application
- f. Status of NRC TSB FY 2006 Goals
 - i. The NRC website actually has an outline of this
 - ii. NRC Status
 - (1) TSTF 409 will become Model
 - (2) Others are being worked on
 - (3) NRC providing their management a graph of the TSTF inventory
 - (4) The issues that affect the TSB making their schedules include:
 - (a) TSB resources
 - (b) Technical Branch resources
 - (c) TSTF timeliness and quality
 - (5) Tom Boyce provided the statistics of TSB meeting the goals for FY 06
 - (6) NRC reviewing all Inspection Manual Part 9900 Technical Guidance on Technical Specifications
 - (a) Identify and remove any out-of-date guidance
 - (b) Make remaining guidance more concise and usable
 - (c) Assigned to Carl Schulten
 - (7) **(TSTF Action)** TSTF/EXCEL work with NRC to develop the new Part 9900 and the document to outline sections applicable to ITS by section
 - (a) Also communicate with the plants to see what they have developed that can contribute
 - (8) NRC is still trying to get electronic copies of all plants TS posted to their website
 - (a) **(NRC Action)** NRC will provide an update of this at the

next meeting or TSTF/NRC conference call. Problem is having copies of TS that will be maintained and updated as revisions occur

- g. TSTF Priorities for 2006
 - i. NRC LAR review process for plant-specific amendments for approved Travelers (single and bulk)
 - ii. NRC/Industry agreed position regarding fee exempt Travelers (what's fee exempt and how documented)
 - iii. Established procedures and pilot use of on-line commenting for complex Travelers
 - iv. Obtain NRC endorsement of TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications"
 - v. Obtain NRC approval of a version of TSTF-448 that is acceptable to the industry
 - vi. Obtain NRC approval of a version of TSTF-493 that is acceptable to the industry
 - vii. Obtain NRC approval of risk-informed Travelers TSTF-423, TSTF-425, TSTF-426 and TSTF-427
 - viii. Obtain NRC approval of the Travelers that have no outstanding issues and have been under NRC review for > 12 months
 - (1) TSTF-374, Rev. 0
 - (2) TSTF-409, Rev. 2
 - (3) TSTF-476, Rev. 0
 - ix. Obtain NRC approval of the following high-benefit Travelers:
 - (1) TSTF-478 (CAD)
 - (2) TSTF-477 (CR HVAC)
 - (3) TSTF-459 (RHR)
 - (4) TSTF-486 (STAR)
 - x. NRC acknowledge that these are the TSTF's priorities
- h. Maintaining Current Status of Traveler Reviews
 - i. NRC agrees to have a monthly status conference call, usually on the next to last Thursday of each month at 1:00 PM EST
 - ii. TSTF will develop a standard agenda to keep the call < 30 minutes and will provide an agenda before each call
 - iii. The monthly status call is not intended to preclude the NRC from calling anyone on the TSTF about issues at other times.
- i. Travelers Under Development for Submittal
 - i. Safety Function Determination Program (SFDP) Bases Change
 - ii. High Point Venting
 - (1) NRC stated that this is a very large issue and the NRC is developing a position on this. Any submitted Traveler may receive extra attention as the NRC develops its position.
 - iii. Admin controls reference clarified
 - iv. Clarify "direct access" to outside atmosphere
 - v. Bases change only on GE SIL
 - (1) **(TSTF Action)** NRC requested a pre-submittal conference call on this Traveler
- j. Use of Online Comment Resolution for Travelers
 - i. NRC agrees with TSTF process
- k. Solicitation of NRC comments on Travelers to Facilitate the Ability of the NRC to

use the Traveler Justification and NSHC to create Safety Evaluation and Model Application

- i. Discussed above. TSTF will work with the NRC on the TSTFs to develop a model application to be a part of the Traveler
- I. Discussion of draft NEI 06-02, Appendix B, "Plant-Specific Adoption of TSTF Travelers, "to Determine if there are Issues Not Addressed in the Revised NRC Traveler Review Process
 - i. TSTF continuing to work with LATF on NEI 06-02 and with the TSB on LIC-101 and LIC-TSTF to ensure the procedures and processes are consistent and integrate well.
- m. NRC Generic Letter 2006-01 and Adoption of TSTF-449
 - i. General communication went through TSB
 - ii. The plan did not have a date when TSB reviewed it
 - iii. TSTF asked that TSB advise TSTF in the future if there is some correspondence that would affect TSTFs or Travelers and TSB agreed they would
- n. NUREG Related Issues
 - i. **(NRC Action)** NRC will put the Writers Guide on the NRC website as background material and to show its use by Industry and NRC (Roth, during next routine web update)
- 3. TRAVELERS AND TECHNICAL ISSUES
 - a. CLIP Activity
 - i. Preparing CLIPs for Previous Approved Travelers
 - (1) TSTF-360
 - (a) TSTF 360 Eva Brown Acting Branch Chief Electrical Branch
 - (i) TSTF 360 has the greatest interest to the Industry
 - (ii) 4 to 5 LARs are currently under review
 - (iii) The staff is focused on resolving the TSTF-360 amendments in-house, but does not recommend that others submit amendments on TSTF-360 until the issues are resolved.
 - (iv) There has been a great deal of NRC differences of opinion on TSTF 360
 - 1) Most of these are plant specific quality concerns – not necessarily the TSTF 360 itself
 - (v) This has highlighted some EE Branch issues with TSTF 360
 - (vi) NRC concerned with a lack of sufficient detail in expressing the design margin being removed by TSTF 360
 - (vii) NRC sees some of these issues as being operationally limiting and there are some policy issues
 - (viii) EE Branch is going to recommend a revision to the TSTF
 - (ix) EE Branch is not convinced TSF 360 is a good candidate for CLIP
 - (x) EE Branch is still trying to address technical and

policy issues

- 1) EE Branch considering revising Reg Guides
 - (xi) Concerned that the interaction of TSTF-360 changes and other changes may inappropriately reduce the design margin
 - (xii) The recent plant-specific RAIs are representative of the generic EE Branch concerns
 - (xiii) Industry wants to have a clearly defined box of requirements for the LAR to address when adopting TSTF 360
 - (xiv) There may be other TSTFs the EE Branch is looking at revising
 - (xv) EE Branch definitely concerned about grid stability and design margin erosion
 - (xvi) **(TSTF Action)** TSTF needs to look at the plant specific RAIs to get some sense of what the generic changes that need to be made to TSTF-360
 - (xvii) The concerns are coming out of the holistic view of all the electrical issues ongoing today from a cause and affect standpoint
 - (xviii) **(TSTF / NRC Action)** TSTF and EE Branch work together to outline the concerns of the TSTF 360
 - (xix) Need to address the risk informed change to the battery CT
- (2) Results of Owners Group Survey of other Travelers
- (a) TSTF-360, Revision 1, "DC Electrical Rewrite," Applicable to all NUREGs
 - (b) A combined model SE, model application, and review guide for Travelers that update Chapter 1 and Section 3.0. The TSTF will develop a list of candidate Travelers
 - (c) TSTF-51, Revision 2, "Revise containment requirements during handling irradiated fuel and core alterations," and TSTF-471-T, Revision 1, "Eliminate use of term CORE ALTERATIONS in ACTIONS and Notes," Applicable to all NUREGs
 - (d) TSTF-363, Revision 0, "Revise Topical Report references in ITS 5.6.5, COLR," Applicable to all NUREGs
 - (e) TSTF-400, Revision 1, "Clarify SR on Bypass of DG Automatic Trips," applicable to all NUREGs
 - (f) TSTF-439, Revision 2, "Eliminate Second Completion Times Limiting Time From Discovery of Failure to Meet an LCO," applicable to all NUREGs
 - (g) TSTF-258, Revision 4, "Changes to Section 5.0, Administrative Controls," Applicable to all NUREGs
 - (h) TSTF-286, Revision 2, "Define 'Operations Involving Positive Reactivity Additions'," Applicable to NUREG-1430, - 1431, -1432
 - (i) TSTF-222, Revision 1, "Control Rod Scram Time Testing," Applicable to NUREG-1433, -1434

- (j) TSTF-230, Revision 1, "Add new Condition B to LCO 3.6.2.3, 'RHR Suppression Pool Cooling,'"Applicable to NUREG –1433, -1434
 - (k) **(TSTF Action)** TSTF develop the combined Travelers that address a combined model SE, model application, and review guide for Travelers that update Chapter 1 and Section 3.0. The TSTF will develop a list of candidate Travelers for Section 1.0, 3.0
- b. Technical Issues
 - i. Applicability of SR 3.0.3 to Post Maintenance Testing and to SRs that have never been performed
 - (1) **(TSTF Action)** TSTF is currently developing a White Paper that is under review and will submit to TSB by April 7, 2006
 - ii. Apparent 10 CFR 50.36 requirement that LAR include a summary statement of the bases or reasons for such specifications, other than those covering administrative controls.
 - (1) **(TSTF Action)** TSTF is currently developing a White Paper that is under review and will submit to TSB by April 7, 2006
 - iii. Applicability of TSTF 479 change to applying SR 3.0.2 to IST Frequency
 - (1) TSTF 479 Discussion
 - Garry Hammer - Component Integrity
 - Dave Fischer – Component Integrity
 - (2) NRC concern is the apparent allowance of applying 25% of SR 3.0.2 to any frequency greater than 2 years given:
 - (a) That some valves are tested on 5 year and 10 year frequencies
 - (3) NRC wants to limit the applicability of the 25% of SR 3.0.2 to a 2 year frequency or less
 - (4) One plant has already agreed to make the change to limit the 25% to the frequencies of 2 years or less
 - (5) **(TSTF Action)** TSTF will go back to and look at this issue and if agree submit a new Traveler in about 6 weeks – 4/30/06
 - (6) This clarification would probably not be fee billable
 - (7) **(TSTF Action)** Provide recommended words to NRC for review in about 1 week *
- c. Traveler Status Review
 - i. Use Meeting Master Status Report or the Monthly Status Report for comments on all Travelers. The following Travelers were discussed in detail:
 - ii. TSTF 493
 - (1) Industry cannot provide the specific list of SL LSSS for approximately 6 months
 - (2) NRC needs an interim solution
 - (3) In the interim:
 - (a) NRC issue Generic Communications about status and use of TSTF 493
 - (b) Not issue TSTF 493 at this time
 - (c) State TSTF 493 under review until the Specific SL LSSSs identified
 - (d) NRC would use the TSTF 493 in the interim as a basis of plant specific LAR reviews
 - (e) RIS to be issued by 5/31/06
 - iii. TSTF 425

- (1) The NRC is not comfortable with many plants adopting TSTF-425 after Limerick is approved. Would like a second lead plant so they can verify that the guidance is transferable to a new site as intended

* Post-meeting, the TSTF stated that they do not agree and plan on presenting a technical position by April 15, 2006.

- iv.
 - (2) **(TSTF Action)** TSTF to seek a follow-on pilot for TSTF-425
 - TSTF 468
 - (1) **(TSTF Action)** TSTF develop a revision to the TSTF to clarify:
 - (a) That this is a deterministic change
 - (b) Clarify the CTs are not additive and either at time = 0 declare the component inoperable or the bus inoperable
 - (c) Provide revision within 2 months
 - (d) **(TSTF/NRC Action)** Have a pre application draft documentation meeting
- v. TSTF 446
 - (1) SE on Topical with Projects and to be issued by the end of February.
 - (2) The main issue is multiple condition entry since the topicals do not evaluate this - requiring a LERF evaluation is a product of the TS format and topical assumptions. A CRMP LERF evaluation is one way to control risk with multiple CIVs out of service. Limiting the PCIVs out of service based on the topical report analysis is another (only one CT PCIV out at a time) - standard (a)(4) evaluation then applies.
 - (3) The TSTF 446 , TSTF 373 and TSTF 454 may need to be revised to address LERF and Multiple Conditions Entry based on the Topical SE
 - (4) **(TSTF Action)** TSTF work with the NRC to outline the proposed changes to the CIV TSTFs to address LERF – work with the OG to have a call with NRC Friday 2/24/06
 - (5) NRC developing a Model Application and criteria for how the LERF will be evaluated.
- d. New Issues
 - i. Adding an LCO for BWOG ITS NUREG that was relocated
 - (1) **(NRC Action)** NRC will provide a proposed Traveler on internal vent valves (Harbuck, 2008)
 - ii. ESBWR Technical Specifications
 - (1) The NRC would like to see a NUREG for all the new designs
 - iii. Closing of TACs
 - (1) NRC will close TACs if there is no response in 90 days
 - (2) Monthly TSTF/NRC phone calls will support this not having to occur
 - iv. Standardized Format
 - (1) NRC wants some process assuring that LARs for CLIIPs meet standards defined or inferred in CLIIP
 - (2) NRC is evaluating appropriate criteria internally.
 - v. NRC wants to put a threshold on Custom Tech Spec plants and old Standard Tech Spec plants adopting a Traveler or a CLIIP – Custom TS plants need not apply and possibly even the old Standard Tech Spec plants need not apply

- vi. **(EXCEL Action)** EXCEL provided a list of non ITS custom Tech Spec plants and old Standard Tech plants by vendor by 3/15/06
4. NEXT MEETING
- a. **(TSTF Action)** TSTF will get back to NRC as to the recommended dates

February 23, 2006 TSTF Meeting Attendance

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