

## REVIEW PLAN FOR TSTF-449 CLIP AMENDMENTS

### Overview

The table below provides guidance to the Technical Specification Branch (ITSB) and Steam Generator Tube Integrity and Chemical Engineering Branch (CSGB) staff who will be processing license amendment requests (LARs) for licensees who wish to adopt TSTF-449, "Steam Generator Tube Integrity."

### Process

The consolidated line item improvement process (CLIP) for TSTF-449 requires the licensee to provide a large amount of information to the NRC staff. The first several LARs submitted for TSTF-449 have demonstrated that there are several factors that may lead to requests for additional information (RAIs) by the staff. Some of the RAIs to date have been administrative in nature, while others come about when the licensee wishes to incorporate alternate repair criteria into their steam generator program. Due to these and other factors, it is anticipated that almost all reviews of TSTF-449 LARs will result in some number of RAIs, and most of these RAIs will come from the CSGB staff. The staff anticipates that receiving and evaluating licensee answers to the RAIs will define the critical path for review and approval of each TSTF-449 license amendment. Therefore, the steps in the table below specify early and continuous communication between ITSB and CSGB reviewers regarding the status of RAIs and RAI response.

Responsibility	Action	Timeliness Metric*	
		STS Plants	Non-STS Plants**
NRC Project Manager	Follow LIC-101 procedures. Route WPC blue sheet to ITSB. Leave "Lead Branch" block blank.	<i>Time from receipt of licensee's amendment request</i>	
		10 days (5 hours charged to TRIM)	10 days (5 hours charged to TRIM)
ITSB CLIP Manager/DPR	Use the CLIP Tracking Table (located at G:\ADRO\DIRS\ITSB\CLIP\CLIP Tracking Table) to determine whether ITSB or CSGB will be lead technical reviewer. Fill out WPC blue form and send back to WPC	<i>Time from receipt of WPC Blue Sheet</i>	
		2 days (1 hour charged to TRIM)	2 days (1 hour charged to TRIM)

Responsibility	Action	Timeliness Metric*	
		STS Plants	Non-STS Plants**
ITSB Reviewer	Perform acceptance review by comparing licensee's submittal with model LAR and TSTF-449. Screening criteria include: (1) Licensee is proposing to use alternate repair criteria/methods based on older S/G's, or evaluation methods for portions of the S/G tubes that are within the tube sheet. (2) Other excessive deviations from the model LAR and SE. (3)	<i>Time from receipt of WPC Blue Sheet</i>	
		10 days (5 hours charged to TRIM)	20 days (5 hours charged to TRIM)
CSGB Reviewer	Review all incoming TSTF-449 LARs. Develop RAI's if necessary. Send RAI's to PM, copy to ITSB (Dave Roth and Eric Thomas)  [NOTE: If a Licensee is asking for the approval of extra licensing actions within its TSTF-449 LAR, the staff should consider either rejecting the submittal, or processing it as a normal license amendment request outside of the CLIP.]	<i>Time from receipt of WPC Green Sheet</i>	
		10 days (20 hours charged to TRIM)	20 days (40 hours charged to TRIM)

Responsibility	Action	Timeliness Metric*	
		STS Plants	Non-STS Plants**
<b>REVIEW PROCESS (ITSB AS LEAD BRANCH)</b>			
ITSB Reviewer	Draft plant-specific SE based on model SE from the ITSB web page. Coordinate with PM and CSGB if RAI's have been issued. Incorporate any relevant RAI responses, licensee letters, and other deviations into the generic SE for TSTF-449. Send concurrence package (licensee's LAR, licensee-specific SE) to PM for review and concurrence. [Optional: If there were significant RAIs issued to the licensee, the SE should be concurred on by CSGB prior to sending it to the PM}	<i>Time following completion of acceptance review (or time following receipt of RAI responses)</i>	
		20 days (20 hours charged to TRIM)	40 days (40 hours charged to TRIM)
CSGB Reviewer [Optional]	Review plant-specific SE. Ensure all RAI responses and deviations from the TSTF are adequately addressed. Concur on SE and forward to PM for issuance	<i>Time following receipt of SE from ITSB</i>	
		10 days (10 hours charged to TRIM)	20 days (20 hours charged to TRIM)
<b>REVIEW PROCESS (CSGB AS LEAD BRANCH)</b>			
CSGB Reviewer	Perform analysis of alternate repair criteria and any other deviations from TSTF-449 for acceptability.	<i>Time following receipt of WPC green sheet</i>	
		20 days (40 hours charged to TRIM)	40 days (80 hours charged to TRIM)

Responsibility	Action	Timeliness Metric*	
		STS Plants	Non-STS Plants**
CSGB Reviewer	Draft plant-specific SE input based on model from ITSB web page. Ensure all RAI responses and deviations from the TSTF are adequately addressed.	<i>Time following receipt of RAI responses</i>	
		10 days (20 hours charged to TRIM)	20 days (40 hours charged to TRIM)
ITSB Reviewer	Review and concur on CSGB input. Put together plant-specific SE package and forward to PM for issuance	<i>Time following receipt of SE input from CSGB</i>	
		5 days (10 hours charged to TRIM)	10 days (20 hours charged to TRIM)

\*The times listed assume the licensee's LAR for adoption of TSTF-449 is of high-quality, and meets the requirements in the model LAR, model SE, and the TSTF. Licensees who submit incomplete, inconsistent, or less detailed applications can expect longer review times, requests for additional information, or LAR rejection.

\*\* Plants using Custom Technical Specifications (CTS) can expect a longer review time, as CTS preclude NRC's ability to review TSTF-related LARs under this accelerated program.