

June 26, 2006

MEMORANDUM TO: Timothy J. Kobetz, Chief
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: David E. Roth, Reactor Systems Engineer */RA/*
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SUBJECT: SUMMARY OF JUNE 8, 2006, CATEGORY 2 MEETING WITH
THE TECHNICAL SPECIFICATIONS TASK FORCE TO
DISCUSS TSTF-459, REV. 1, PROVIDE AN EXCEPTION TO
THE REQUIREMENT TO HAVE ONE RHR SHUTDOWN
COOLING SYSTEM IN OPERATION (TAC NO. MD0039)

On June 8, 2006, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of the Technical Specifications Task Force at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, MD. The purpose of the meeting was to discuss TSTF-459 "Provide an Exception to the Requirement to Have One RHR Shutdown Cooling System in Operation." The "traveler" (a suggested change to the standard technical specifications) would permit RHR shutdown cooling to be secured until a certain temperature limit is reached instead of the current time-based limit. The traveler was submitted to the NRC on February 13, 2006 (ML060440645).

The meeting generally followed the planned agenda (see ML061440428). The purpose of the meeting was information gathering. Highlights of some topics are below.

Need for Traveler

The TSTF representatives stated that the proposed change was to assist the performance of in-vessel visual inspections (IVVI). The current technical specifications did not provide sufficient time to complete the inspections under ideal pump-off conditions.

The traveler proposed changes for reactor operational MODE 4, MODE 5 with irradiated fuel in the reactor pressure vessel (RPV) and the water level \geq [23] ft above the top of the RPV flange, and MODE 5 with irradiated fuel in the RPV and the water level $<$ [23] ft above the top of the RPV flange. During the discussions, it was not clear that the traveler would be needed for MODE 4 operations. The TSTF representatives agreed to discuss this aspect of the change more with industry. Accordingly, the discussion on the need for the MODE 4 change was tabled.

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The industry representatives expressed that the change was needed to address the perceived potential for regulatory action if a licensee did a planned outage on the SDC system. The concern was that even if all the required technical specifications actions statements were taken (e.g. alternate circulation was established, alternate method of decay heat removal was available), the NRC might take regulatory action based on failure to have operable, operating, RHR SDC.

Changes in Potential Operator Error

The TSTF representatives stated that potential operator errors would be reduced because there would be fewer manipulations of equipment due to a reduced need to start and stop the pumps.

Instruments Used to Monitor Temperature

The proposed change would alter the LCO from monitoring time to monitoring temperature. The meeting attendees discussed the various methods available for temperature monitoring, including the typical locations for instrumentation sensors and readouts. The representatives discussed how procedures at a BWR/6 plant (Perry) addressed activities associated with the LCOs that would be affected by the proposed change. Generally, it appeared that the bulk reactor water and refueling water temperature monitoring was done on non-TS instruments that were not permanently installed (e.g. a strip chart recorder that was easier to read than a digital display).

Suggested Upper Temperature

The staff discussed the origin of the proposed 200°F temperature limit, but recognized that the actual value would be site-specific. The staff stated that reaching a 200°F bulk pool temperature prior to requiring additional actions seemed high. Discussions showed the value was chosen was related to other TS requirements (e.g. MODE changes). It did not appear the value was related to the heat up rate and time needed to address an unexpected heatup in the reactor. The industry representative noted an example of procedures that limited the temperature to 190°F. The industry representative agreed to re-examine the suggested temperature.

Traveler's Impact on Automatic LPCI Initiation.

The industry representatives discussed how the requested change would not have an impact on LPCI automatic initiations.

Traveler's Relationship to Previous Events

The industry representatives stated that previous events appeared to have in common a failure to establish reactor coolant circulation. The NRC and the industry staff discussed how the current technical specifications do have an action statement to verify reactor coolant circulation by an alternate method if it is discovered that reactor coolant circulation existed. However, under the proposed TSTF-459, this action statement would not be entered. The industry representatives agreed to consider revising the proposal to require establishment of reactor coolant circulation, perhaps taking advantage of natural circulation.

Re-Visit Need for Traveler

The discussions returned to the need for TSTF-459 -- specifically if by taking the actions already specified in the various LCOs for no RHR SDC, the licensees had sufficient regulatory

flexibility to perform the IVVIs. The industry representatives agreed to discuss the issue further with the various reactor licensees.

Time for Next Discussion

The industry representatives agreed to decide, within about three months, if a revision to the traveler to address the above comments would be submitted.

Handouts

No handouts were provided during the meeting.

Public Attendance

The meeting was done by teleconference. A members of the public was in attendance via teleconference. Public Meeting Feedback forms were not received.

Enclosure: Meeting Attendees

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ATTENDEES OF THE JUNE 8, 2006, CATEGORY 2 MEETING WITH THE TECHNICAL SPECIFICATIONS TASK FORCE TO DISCUSS TSTF-459, REV. 1, PROVIDE AN EXCEPTION TO THE REQUIREMENT TO HAVE ONE RHR SHUTDOWN COOLING SYSTEM IN OPERATION

NRC

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David Roth, Reactor Systems Engineer, Technical Specifications Branch, NRR/ADRO/DIRS
George Thomas, Reactor Systems Engineer, BWR Systems Branch, NRR/ADES/DSS

INDUSTRY

Brad Ferrell, TSTF-459 lead, TSTF (via teleconference)
Brian Mann, EXCEL Services Corporation (via teleconference)

PUBLIC

Nancy Chapman, Bechtel (via teleconference)

Enclosure