

# RISK INFORMED TECHNICAL SPECIFICATION TASK FORCE (RITSTF) RISK MANAGEMENT TECHNICAL SPECIFICATION INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
1	Technical Specification Required Actions Preferred End States	<ul style="list-style-type: none"> <li>NRC issued the CLIIP Notice of Availability for TSTF-422 on July 5, 2005.</li> <li>NRC issued the CLIIP Notice of Availability for TSTF-423 on March 10, 2006.</li> </ul>	<ul style="list-style-type: none"> <li>NRC issued the TSTF-422 Notice of Availability on July 5, 2005.</li> <li>NRC issued the TSTF-423 Notice of Availability on March 23, 2006.</li> <li>TSTF-431 was distributed to the BWO and the RITSTF for review on 7/11/04.</li> <li>BWO Topical Report (BAW-2441) was submitted to NRC on 1/19/04. The NRC provided RAIs on 6/29/04. The BWO responded to the RAIs in 2/05.</li> <li>The NRC provided the draft SE for the BWO Topical Report for review in May 2006. Areva preparing comments. TSTF-431 will be revised and submitted to the NRC following approval of the Topical Report. Implementation guidance to be developed.</li> <li>WOG submitted their Topical Report on 9/9/05.</li> <li>NRC will review the WOG Topical Report in FY 06.</li> </ul>	TSTF-422-A R0 (CEOG)  TSTF-423-A R0 (BWROG)  TSTF-431 R0 (BWO)  TSTF-432 R0 (WOG) <i>(Not created)</i>
2	Missed Surveillances SR 3.0.3	<ul style="list-style-type: none"> <li>TSTF-358, R6 has been approved and published for CLIIP adoption.</li> </ul>	<ul style="list-style-type: none"> <li>Initiative Complete.</li> <li>The TSTF issued implementation guidance, TSTF-IG-06-01, for TSTF-358 on 5/05/06.</li> </ul>	TSTF-358-A R6

## NEI RITSTF

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## RITSTF INITIATIVE STATUS

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3	Increase Flexibility in Mode Restraints LCO 3.0.4	<ul style="list-style-type: none"> <li>TSTF-359, R9, has been approved and published for CLIIP adoption.</li> </ul>	<ul style="list-style-type: none"> <li>Initiative Complete.</li> <li>The TSTF issued updated implementation guidance, TSTF-IG-06-02, for TSTF-359 on 5/08/06</li> </ul>	TSTF-359-A R9
4a	Individual Risk Informed Completion Times	<ul style="list-style-type: none"> <li>Owners Groups (OGs) are pursuing generic Risk Informed Completion Time extensions through OG-specific Topicals and license amendments.</li> </ul>	<ul style="list-style-type: none"> <li>TSTF-373R2, "Increase CIV Completion Time in Accordance With CE-NPSD-1168," approved on 2/27/04.</li> <li>The Notice for Comment for TSTF-409R2, "Containment Spray System Completion Time Extension (CE NPSD-1045-A)," was published on 4/11/06. The RITSTF provided comments on 5/10/06. On 6/13/06, NRC provided responses and requested a meeting.</li> <li>TSTF-417R0, "AC Electrical Power System Completion Times (WCAP-15622)," has been withdrawn.</li> <li>TSTF-430R0, "AOT Extension to 7 Days for LPI and Containment Spray (BAW-2295-A, Rev. 1)," approved on 8/5/04.</li> <li>NRC accepted TSTF-439R2, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO," as an administrative change in Rev. 3.1 of the ISTS NUREGs.</li> <li>The NRC completed their review of the Topical Report that supports TSTF-446R0, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)," on 3/10/06. Additional issues being pursued by the lead plant (Wolf Creek). RAI response scheduled to be submitted in July. Revision to the Topical Report or Traveler may be required.</li> <li>TSTF-454R1, "Extend PCIV Completion Times (NEDC-33046)," approved on 12/13/05.</li> </ul>	<p>TSTF-373-A R2 (CEOG)</p> <p>TSTF-409 R2 (CEOG)</p> <p>TSTF-417 R0 (WOG)</p> <p>TSTF-430-A R0 (BWOG)</p> <p>TSTF-439-A R2 (ALL OG)</p> <p>TSTF-446 R0 (WOG)</p> <p>TSTF-454-A R1 (BWROG)</p>

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4b	Risk Informed Completion Times With Configuration Risk Management Program or Maintenance Rule Backstop	<ul style="list-style-type: none"> <li>Fort Calhoun, South Texas Project, and Prairie Island have volunteered to develop pilot submittals.</li> <li>Fort Calhoun and South Texas Project have submitted their pilots.</li> <li>The RITSTF is working to resolve the NRC's comments on the Risk Management Guidelines, the STP submittal, and the Traveler.</li> </ul>	<ul style="list-style-type: none"> <li>RITSTF will develop a White Paper to address the interface of the a.4 process to the Initiative 4b and Initiative 6 process to show the overlap and transition for ITS and non ITS plants and will provide to NRC by 12/05.</li> <li>The RITSTF has created an Initiative 4b Subgroup to coordinate responses to the NRC RAIs.</li> <li>The RITSTF provided responses to the NRC and met to discuss these responses on 12/15/04.</li> <li>NRC visited STP week of 1/18/05 to evaluate applications of Initiative 4b.</li> <li>NRC and RITSTF met 3/17-18/05 and 5/3-5/4, 2005 to discuss policy issues.</li> <li>The RITSTF has revised the draft Risk-Managed Technical Specifications (RMTS) Guidelines document incorporating the results of the discussions with the NRC. The revised draft RMTS document was provided to the NRC at the August 2005 RITSTF/NRC meeting.</li> <li>NRC provided comments on the draft RMTS to RITSTF on 9/21/05. RITSTF developing a response.</li> <li>NRC and RITSTF met in 12/2005 to discuss the RAI responses on the STP pilot.</li> <li>RITSTF provided the revised RMTS guidelines document to the NRC on 2/3/06.</li> <li>NRC and RITSTF met to review the RMTS guidelines document on 2/28/06 and 4/27/06.</li> <li>RITSTF provided a revised RMTS guideline document to the NRC on 4/3/06 and 5/10/06.</li> <li>NRC visited STP 6/19-22/06 to audit process.</li> <li>The TSTF will submit a revision to TSTF-424 to address the NRC comments in the Fall of 2006.</li> </ul>	TSTF-424 R0

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5a	Relocate Surveillance Requirements Not Related to Safety	<ul style="list-style-type: none"> <li>Deterministic portion of Initiative 5 transferred to TSTF responsibility.</li> </ul>	<ul style="list-style-type: none"> <li>TSTF reviewing candidate SRs to be relocated.</li> <li>PWROG and BWROG to determine if funding will be requested for this initiative by 12/06.</li> </ul>	None assigned
5b	Relocate Surveillance Test Intervals to Licensee Control	<ul style="list-style-type: none"> <li>RITSTF/BWROG/Pilot Plant are applying the methodology and interfacing with the NRC on the issues.</li> </ul>	<ul style="list-style-type: none"> <li>The Limerick lead plant license amendment was submitted on 6/11/04.</li> <li>TSTF-425 was submitted to the NRC on 8/31/04.</li> <li>NEI provided the formal methodology document to the NRC on 2/3/05.</li> <li>NRC reviewed the Limerick LAR, TSTF-425, and the methodology document and issued RAIs 4/12/05 to the RITSTF.</li> <li>The NRC provided additional comments and the first set of RAIs on 10/20/05.</li> <li>The RITSTF has submitted responses to the first set of NRC RAIs in 12/05 and has significantly revised the methodology document. Limerick submitted responses to plant-specific RAIs in 12/05, 2/28/06, and 4/4/06.</li> <li>At the 2/22/06 TSTF/NRC meeting, the NRC stated that before approving TSTF-425 for general adoption, they would like a second lead plant in order to verify that the methodology is transferable.</li> <li>The NRC held an internal meeting on 5/30/06 to discuss the Electrical Engineering Branch's comments on TSTF-425.</li> <li>On 6/6/2006, NRC provided additional RAIs to Limerick.</li> <li>Limerick preparing response to NRC's RAIs. Draft to be provided to NRC in early 7/2006.</li> </ul>	TSTF-425 R0

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6a	Modify LCO 3.0.3 Actions and Timing 1 hour - 24 hours	<ul style="list-style-type: none"> <li>On hold.</li> </ul>	<ul style="list-style-type: none"> <li>On hold for resolution of Initiative 6b and 6c to determine if Initiative 6a is required.</li> </ul>	None assigned
6b	Provide Conditions in the LCOs for Those Levels of Degradation Where No Condition Currently Exists to Preclude Entry Into LCO 3.0.3	<ul style="list-style-type: none"> <li>NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>TSTF-426 R0 was submitted to the NRC on 8/30/04.</li> </ul>	<ul style="list-style-type: none"> <li>NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>TSTF-426 R0 was submitted to the NRC on 8/30/04.</li> <li>NRC provided an RAI on TSTF-426 on 11/13/04. The TSTF provided responses on 4/27/05.</li> <li>The TSTF-426 Implementation Guidance was provided to NRC in 8/05.</li> <li>NRC plans to issue the Notice for Comment by 7/15/06.</li> </ul>	TSTF-426 R0
6c	Provide Specific Times in the LCO For Those Conditions That Require Entry Into LCO 3.0.3 Immediately	<ul style="list-style-type: none"> <li>NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>TSTF-426 R0 was submitted to the NRC on 8/30/04.</li> </ul>	<ul style="list-style-type: none"> <li>NRC issued Safety Evaluation for Topical Report on 7/9/04.</li> <li>TSTF-426 R0 was submitted to the NRC on 8/30/04.</li> <li>NRC provided an RAI on TSTF-426 on 11/13/04. The TSTF provided responses on 4/27/05.</li> <li>The TSTF-426 Implementation Guidance was provided to NRC in 8/05.</li> <li>NRC plans to issue the Notice for Comment by 7/15/06.</li> </ul>	TSTF-426 R0

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7a	Impact of Non Technical Specification Design Features on Operability Requirements - Barriers	<ul style="list-style-type: none"> <li>The NRC issued the FRN Notice of Availability for TSTF-372, Rev. 4 on 5/4/05.</li> <li>The TSTF issued implementation guidance, TSTF-IG-05-03, for TSTF-372 on 11/1/05.</li> <li>The NRC issued the FRN Notice for Comment for TSTF-427, Rev. 2 on 6/2/06.</li> </ul>	<ul style="list-style-type: none"> <li>The NRC published the FRN Notice of Availability for TSTF-372 on 5/4/05.</li> <li>The TSTF issued implementation guidance for TSTF-372 on 11/1/05.</li> <li>TSTF-427 Implementation Guidance was provided to the NRC on 09/21/04. NRC provided comments on the draft guidance on 10/13/04.</li> <li>NRC provided RAIs on TSTF-427 and the implementation guidance on 11/13/04 and 6/2/2005. RITSTF provided responses to the NRC's RAIs on 3/23/05.</li> <li>Members of the TSTF &amp; RITSTF met with the NRC on 7/28/05 to discuss the NRC comments.</li> <li>The revised Implementation Guidance and a draft of TSTF-427 were provided to the NRC on 11/10/05. The NRC provided comments in 12/05. The TSTF submitted a revision to TSTF-427 on 2/3/06. The RITSTF submitted the Implementation Guidance on 2/6/06.</li> <li>The RITSTF submitted the revised Implementation Guidance to address NRC comments on 4/4/06.</li> <li>The TSTF submitted a revision to TSTF-427 on 5/3/06.</li> <li>The NRC issued the FRN Notice for Comment for TSTF-427, Rev. 2 on 6/2/06. The TSTF and RITSTF to submit comments.</li> </ul>	<p>TSTF-372-A R4</p> <p>TSTF-427 R0</p>

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7b	Impact of Non TS Design Features on Operability Requirements – All other SSCs not in Technical Specifications	<ul style="list-style-type: none"> <li>A White Paper on the process to address this scope of SSCs is being developed.</li> </ul>	<ul style="list-style-type: none"> <li>RITSTF will develop a White Paper to outline the process and to address the scope of SSCs in 12/06.</li> <li>The TSTF will develop a Traveler following NRC acceptance of the White Paper process.</li> </ul>	None assigned
8a	Remove or Relocate Systems LCOs That Do Not Meet the 4 Criterion of 10 CFR 50.36 From Technical Specifications	<ul style="list-style-type: none"> <li>A White Paper on the application of the 10 CFR 50.36 criteria has been developed.</li> </ul>	<ul style="list-style-type: none"> <li>The TSTF has developed a White Paper to outline the guidance and methodology based on NEI 00-04 for the application of the four criteria of 10 CFR 50.36 and a list of the systems identified for relocation.</li> <li>The White Paper was provided to the Owners Groups in 12/05. The TSTF and RITSTF will develop a draft Traveler for Owners Group consideration by the third quarter of 2006.</li> </ul>	None assigned
8b	Modify 50.36 Rule to Permit Removal or Relocation of Non Risk Significant Systems out of Technical Specifications	<ul style="list-style-type: none"> <li>Requires Rulemaking</li> </ul>	<ul style="list-style-type: none"> <li>RITSTF looking at coordinating Initiative 8b with longer-term initiatives given the requirements for rulemaking.</li> <li>Approach favored by NEI and NRC is making Criterion 4 a “two way door” (e.g., if it doesn’t meet Criterion 4, Specification can be relocated even if it meets Criteria 1, 2, or 3).</li> </ul>	Not applicable

PWROG - Active in Initiatives 1, 4, 5, 6 and 7

BWROG - Active in Initiatives 1, 4, 5 and 8