

August 2, 2006

Mr. Biff Bradley
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

SUBJECT: SUMMARY OF JULY 25, 2006, MEETING TO DISCUSS TSTF-409

Dear Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the Pressurized Water Reactor Owners Group (PWROG) and the Nuclear Energy Institute (NEI). The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on July 25, 2006. The purpose of the meeting was to resolve any remaining issues associated with Technical Specification Task Force (TSTF) Change Traveler TSTF-409 (Containment Spray System Completion Time Extension) and to establish a consensus for proceeding with the consolidated line item improvement process (CLIIP) for this and other risk-informed TSTFs.

The model license amendment request (LAR) and model safety evaluation (SE) for TSTF-409 were noticed for comment in the *Federal Register* on April 11, 2006, [71 FR 18380]. NEI provided comments in a letter dated May 10, 2006.

Sincerely,

Eric M. Thomas, Reactor Engineer/**RA**/
Technical Specifications Branch
Division of Inspection & Regional (DIRS/ADRO)
Office of Nuclear Reactor Regulation

Enclosures: 1. Meeting Summary
2. Attendance List
3. Agenda
4. PWROG Handout dated July 25, 2006

cc w/encl: See attached page

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Letter to Biff Bradley from E. Thomas dated August 2, 2006

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SUMMARY OF THE JULY 25, 2006, NRC/INDUSTRY MEETING TO DISCUSS THE STATUS OF TSTF-409

The NRC staff met with members of the Pressurized Water Reactor Owners Group (PWROG) and the Nuclear Energy Institute (NEI) on July 25, 2006, from 1:00 p.m. to 3:45 p.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of discussions of industry comments on the TSTF-409 *Federal Register* Notice for Comment, and establishing a path forward to publish a *Federal Register* Notice of Availability for TSTF-409. In addition, the agenda included a general discussion of other pending risk-informed TSTFs (RITSTFs), and the appropriate level of probabilistic risk assessment (PRA) discussion that should be required for their adoption. Following is a brief description of the dialogue that took place, and agreements that the participants reached.

Introduction and Background

After a brief discussion of the history of TSTF-409 and its associated Joint Applications Report (JAR), Mr. Ray Schneider of the PWROG presented the slides in Enclosure 4. The members of the PWROG stressed that a major difference between the JAR upon which TSTF-409 is based, and the topical reports (TRs) which provide the basis for many other risk-informed TSTFs is that the JAR is based on plant-specific PRA results for nearly all Combustion Engineering plants, while a TR is based on a generic, bounding analysis of PRA data.

While the PWROG members understood the reasoning behind the NRC staff's approach to TSTF-409, they stressed that this particular TSTF should not be the "poster-child" for all RITSTFs due to its low risk-significance and limited scope. They also recommended that any consolidated line item improvement process (CLIIP) notice published in the *Federal Register* should acknowledge the approved JAR, and only address the PRA issues that are applicable to the containment spray system (which is the system in question for TSTF-409).

The NRC staff stated that licensees with an external events core damage frequency (CDF) near the RG 1.174 limit should be required to justify why it is okay to implement TSTF-409, or else choose not to implement it. The staff also asked how an issue was determined to be "risk-insignificant" and how a plant adequately demonstrates whether it is aligned with a JAR or TR.

Discussion of NEI Comments of May 10, 2006 (Question numbering corresponds to NRC response letter of June 13, 2006)

Question #2: The PWROG expressed a general consensus that the PRA expectations published by the staff in 71 FR 18380 were much more stringent than what was expected. The staff replied that the purpose of publishing explicit conditions and expectations in the model LAR was to eliminate the need for subsequent requests for additional information (RAIs) by the staff when plant specific LARs were later submitted by licensees. The PWROG asked how the staff expected to make a "one size fits all" set of requirements to be applied to generic issues, and asked if the TSTF-446 model LAR conditions would be similar to the RAIs generated thus far on the Wolf Creek plant specific amendment package.

Question #4: NEI felt that requiring licensees to justify their use of a zero-maintenance PRA model was not necessary because RITSTF Initiative 4b allows for the use of a zero maintenance model, and an average maintenance model is inferior in the case of TSTF-409. The PWROG continued by stating that change in core damage frequency (Δ CDF) numbers for an average maintenance model in this instance are so small that they can be considered consistent with the zero maintenance model, so the requirement for licensees to justify use of a zero maintenance model should be removed. The staff responded that it considered this as a Δ CDF rather than a configuration risk management program (CRMP) issue, and that it could be addressed by using the guidance in RG 1.177. The PWROG agreed to provide a recommended generic comment. The staff recommended having licensees show that there is no plant-specific unavailability that would cause a spike in CDF, and that this would be sufficient to relieve them from having to show a quantitative solution.

Question #5: NEI expressed the opinion that it was unnecessary to address external events in this specific application, and that a quantitative analysis of external events would be difficult for many licensees. The PWROG recommended (and the staff agreed) that an approach similar to that of RG 1.174 would be more sensible, where a detailed quantitative approach would only be required if the thresholds in the RG were exceeded. The PWROG stated that, while other applications (involving RITSTFs) may require a more quantitative approach, TSTF-409 should only require a qualitative approach initially. The staff stated the need to verify that licensees had met the commitments they made when validating their individual plant examinations for external events (IPEEEs) so that external risk could be confirmed. The PWROG felt that licensees should be able to use the latest and greatest tools to verify risk, whether or not those tools have been reviewed.

Conclusion

The PWROG expressed a desire to have an additional chance to provide comments and recommendations prior to the staff publishing a *Federal Register* Notice of Availability for TSTF-409. These additional comments and recommendations were provided to the NRC on August 1, 2006.

A brief discussion of TSTF-446 ensued. Attendees agreed in principle that the TSTF-409 result would be used to influence the content of TSTF-446, but that TSTF-446 was a more comprehensive RITSTF example, and would provide a better template for other RITSTF Initiative 4a submittals.

The staff intends to evaluate the additional comments and recommendations received from the PWROG on August 1, 2006, and incorporate them into the TSTF-409 *Federal Register* CLIIP Notice of Availability.

NRC/INDUSTRY MEETING OF THE
RISK-INFORMED TECHNICAL SPECIFICATION TASK FORCE ATTENDANCE LIST
JANUARY 19, 2006

| <u>NAME</u> | <u>AFFILIATION</u> |
|-----------------|--------------------------|
| BIFF BRADLEY | NUCLEAR ENERGY INSTITUTE |
| RAY SCHNEIDER | WESTINGHOUSE/WOG |
| JIM ANDRACHEK | WESTINGHOUSE/WOG |
| JERRY ANDRE | WESTINGHOUSE/WOG |
| NANCY CHAPMAN | SERCH/BECHTEL |
| TIMOTHY KOBETZ | NRC/NRR/ADRO/DIRS/ITSB |
| ERIC THOMAS | NRC/NRR/ADRO/DIRS/ITSB |
| RAVI GROVER | NRC/NRR/ADRO/DIRS/ITSB |
| DAVID ROTH | NRC/NRR/ADRO/DIRS/ITSB |
| BOB TJADER | NRC/NRR/ADRO/DIRS/ITSB |
| CLIFF DOUTT | NRC/NRR/ADRA/DRA/APLA |
| DONALD HARRISON | NRC/NRR/ADRA/DRA/APLA |
| ANDREW HOWE | NRC/NRR/ADRA/DRA/APLA |

AGENDA

SUBJECT: FORTHCOMING MEETING WITH NEI AND INDUSTRY REPRESENTATIVES TO RESOLVE REMAINING ISSUES ASSOCIATED WITH TSTF-409 AND DEFINE A PATH FORWARD FOR OTHER RISK MANAGEMENT TECHNICAL SPECIFICATIONS (RMTS) INITIATIVE 4a TSTFs

July 25, 2006

- Introductions and meeting overview
- Discussion of industry comments on TSTF-409 Federal Register Notice published April 11, 2006
- Public Comment
- Discussion of NRC staff responses to industry comments on TSTF-409
- Discuss content of Federal Register Notice of Availability for TSTF-409 model application and safety evaluation
- Discuss path ahead for other RITSTFs (e.g. TSTF-446)
- Public Comment

Enclosure 3