

TSTF /NRC

Meeting

8/17/06

I. ADMINISTRATIVE ISSUES

- A. Introductions
- B. Agenda Review
- C. Other Administrative Issues
 - 1. Status of NRC activity to make electronic copies of all current plant TS available for NRC website
 - a) NRC plans to make public but probably 8-12 months
 - b) Current copies may not be the latest and greatest
 - c) NRC not sure how they will update information

II. PROCESS ISSUES

- A. Updated TSTF Review Procedures
 - 1. Status of LIC 505
 - a) Currently in concurrence and will be made public when final
 - b) Tim K envisions that this process needs to be more efficient like the Topical process where NRC has a meeting before the TSTF is submitted and they do an acceptance review and set a schedule for the NRC and the TSTF to complete activities and responses
 - c) There will be accountability for the NRC and the TSTF
 - d) The TSTF proposed 90 days versus 45 days as a typical time required to respond to an RAI on a Traveler
 - (1) Under the new process, the TSTF will need to advise the NRC in writing if we will not meet a schedule or the NRC will close the TAC, placing the review at the back of the priority que
 - (2) NRC will call the TSTF about major impediments or issues
 - (3) For LARs the licensees usually get a draft set of RAIs and TSTF would like that process to be followed for Travelers
 - (a) **(NRC Action)** Tim K will evaluate this

- (4) (**EXCEL Action**) NRC and TSTF need to develop a procedure for use of the online review process
- (5) The Acceptance Review conference call will allow NRC/TSTF to agree to a response time for RAIs
- (6) (**NRC Action**) NRC will consider changing the time from 60 to 90 days and providing for a phone call
- (7) Responses to RAIs have to be in writing
- (8) If there is a phone call on the issues then the results need to be documented
- (9) **Goals:**
accountability, documentation and efficiency
- (10) NRC wants a pre-application meeting before a new Traveler is submitted
- (11) Even a revision to a Traveler or a RAI response needs to be flagged to the NRC by a phone call to the TSB for now → Ross
- e) Implications of Closing a TAC
 - (1) This is just an internal process that closes the charge number until a response is received
 - (2) NRC believes if we follow the process there will be no closed TACs
- f) NRC plans to establish a schedule of milestones for NRC and TSTF
- g) TSTF suggested the NRC publish the Model Application for review with the CLIP Notice for Comment
 - (1) The TSB procedure calls for publication of the draft SE and the Model Application at the same time
- h) TSTF request that Travelers issue for comment not be removed from website until the Notice for Availability is issued
 - (1) (**NRC Action**) NRC will retain listing the Traveler on the website until the Notice of Availability is issued
- 2. Status of LIC 101 Revision
 - a) Eric Thomas has inputs available to this document
 - b) The current NRC schedule seems to be late 2006
- 3. Use of Online Comment Resolution for Traveler
 - a) NRC will not use for current TSTFs
 - b) (**EXCEL Action**) Discuss with NRC TSB the benefits of the process and develop a written process for NRC and Industry

4. EXCEL Website
 - a) Brief discussion of ITS reports available on the EXCEL website
- B. NRC Website Update Scheduling
 1. TSTF asked the NRC the schedule for their updates
 2. The current schedule is event driven not a specific schedule
 3. At least quarterly
 4. The NRC web services has a typically good turnaround time
 5. NRC will publish a schedule when they first start a review that lists all correspondence
 6. TSTF is concerned that, by default, the TSTF submitted documents are marked by the NRC as "private" and are not available on ADAMS
 - a) NRC is working on this but there is no simple solution
 - b) TSTF would be willing to establish a Docket Number to ensure the documents submitted are all public
- C. TSTF Schedule Priorities
 1. Status of TSB FY 2006 Goals
 - a) TSB met goals in 2006 plan for TSTFs and risk informed Travelers
 - b) TSB met goals on ITS conversions
 2. TSTF Priorities for 2006
 - a) TSTF-GG-05-01 Writer Guide, TSTF asked the TSB review and endorse
 - b) **(NRC Action)** Tim K will look into means of review and endorsement
 3. TSTF/TSB Priorities for FY 2007
 - a) NRC believes maintaining a list of priorities is extremely useful for scheduling and presentation
 - b) Tim K believes the new process will outline the priorities
 - c) TSB will develop a FY 2007 list of priorities
- D. Fees
 1. June 14, 2006 rejection letter
 2. There are consequences of the NRC decision
 - a) The TSTF/Industry will continue to submit TSTFs that have real cost benefit
 - b) However many other changes that need to be made just do not have enough cost benefit to justify NRC review fees. The TSTF will develop T Travelers for Industry use but these are not sent to NRC for review

3. (**EXCEL Action**) LIC 505 does recognize the distinction between A and T Travelers but needs to be expanded
4. (**TSTF Action**) TSTF may pursue the decision on fee exempt with the NRC Office Director

III. PUBLIC PARTICIPATION

IV. TSTF TRAVELER STATUS UPDATES

- A. TSTF-357, Rev. 1 Revision to TS 2.1.1.2, MCPR Safety Limit
 1. On hold until 12/31/2006
- B. TSTS-409, Rev. 2 Containment Spray System completion Time Extension (CE NPSD-1045-A)
 1. Due 9/30/06
- C. TSTF-412, Rev. 2 Provide Actions for One Steam Supply to Turbine Drive AFW/EFW Pump Inoperable
 1. Due 10/30/06
- D. TSTF-424, Rev. 0 Risk-Informed HPSI AOT/CT Extension (WCAP-15773)
 1. TSTF awaiting the resolution of some issues before creating full scope Traveler
- E. TSTF-425, Rev 0 Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5
 1. TSTF will submit a revision to NRC after Limerick LAR approved and wants
 2. NRC to CLIIP this change \approx 12/30/06 – N for C 3/31/07
 3. NRC Goal 3 months from the N for C to N for A
- F. TSTF-426, Rev 0 Revise or Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF Initiatives 6b and 6c
 1. TSTF to provide comments by 8/20/06
- G. TSTF-427, Rev 2 Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY
 1. Due 9/30/06
- H. TSTF-446, Rev 1 Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)
 1. Awaiting NRC response to Wolf Creek RAIs
- I. TSTF-448, Rev 3 Control Room Habitability

1. Discussed the need for the NRC to address plants that will need an exception to the SR in the model application
- J. TSTF -450, Rev 0 Staggered Integrated ESFAS Testing (WCAP – 15830)
1. Due 7/31/2006
 2. NRC to check on schedule
- K. TSTS-459, Rev 1 Provide an Exception to the Requirement to Have One RHR Shutdown Cooling System in Operation
1. TSTF response due 9/26/06
- L. TSTF-468, Rev 0 Follow Supported Systems Actions Due to an Inoperable MCC or Distribution Panel in lieu of ITS 3.8.9
1. TSTF Revise and resubmit deterministic change by 12/30/06
- M. TSTF -475, Rev 0 Control Rod Notch Testing Frequency and SRM Insert Control Rod Action
1. BWROG to submit Topical Report requested in the NRC’s RAI as a non proprietary version by 9/30/06
 2. NRC will open new TAC for a new review
- N. TSTF-476, Rev 0 Improved BPWS Control Rod Insertion Process (NEDO-33091)
1. Due 9/30/06
- O. TSTF-477, Rev 2 Add Action for Two Inoperable Control Room AC Subsystems
1. **(TSTF Action)** Statement “not change the EQ temperature in the CR” NRC requested revision to remove some of the detail provided in the last revision.
 2. TSTF provide revision due 9/15/06
- P. TSTF-478, Rev 0 BWR Technical Specification Changes that Implement the Revised Rule for Combustible Gas Control
1. **(NRC Action)** NRC has RAIs and will send them. BWROG will get back to NRC on the 5/30/07 date and if there are plants experiencing operational problems due to the delay of the Traveler by 8/30/06
- Q. TSTF-486, Rev 0 Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)
1. **(NRC Action)** NRC to look at date
- R. TSTF-487, Rev 0 Relocate DNB Parameters to COLR
1. **(NRC Action)** NRC to issue final version RAIs to TSTF by 8/19/06

- S. TSTF-490, Rev 0 Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec
 - 1. NRC issue Notice for comment by 10/30/06
- T. TSTF-491, Rev. 2 Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications.
 - 1. Notice for comment due 9/30/06
- U. TSTF-492, Rev 0 Modify RHR – High Water Level Bases to Address Decay Heat Removal with Upper Internals Installed
 - 1. **(EXCEL Action)** Provide examples of other Bases change Travelers
- V. TSTF-493, Rev 0 Clarify Applications of Setpoint Methodology for LSSS Functions
 - 1. Due 1/27/07
 - 2. RIS will be issued before 9/30/06
- W. TSTF-495, Rev 0 Bases Change to Address GE Part 21 SC05-03
 - 1. OGs believe we could not make this change under 50.59 - Need NRC SE to use as a basis for the plant specific Bases changes made under the TS Bases Control Program

V. CLIP STATUS

- A. 2006 Industry Survey on CLIP Adoption
 - 1. Status of Industry adoption is very good
- B. Discussion of comments for Recent FRN
 - 1. Correction of TSTF 374 Model Application
 - a) Many problems still exist
 - b) TSTF will continue to provide comments in the Notice for Comment and the Model Application
 - c) **(NRC Action)** Issue of rejection based on significant differences between the LAR and the CLIP – NRC concerned a Traveler based on a TSTF with significant variations would be kicked out of CLIP to the normal process
 - d) NRC would like the licensee to have a dialogue with the staff before a TSTF is submitted
 - 2. TSTF 426 Notice for Comment

VI. FUTURE PLANNING

- A. TSTFs Under Development

1. TSTFs that affect Sections 1.0 and 3.0
 - a) There are 10 to 15 and approved Travelers approved that address Sections 1.0 and 3.0
 - b) NRC thought they would package these together into one CLIIP to ease adoption for the industry
 - c) NRC does not plan any activity but if TSTF wants this activity then the TSTF needs to ask for it because it would be work on the part of NRC
 2. NRC CLIIP Development Requested List of Travelers
 - a) TSTF 360 was the number one TSTF
 - b) The NRC agreed to look at the other items and consider CLIIPs for them
 3. PWROG and BWROG Topical Reports that affect Technical Specifications under Development
 - (a) BWROG list
 - (b) PWROG list
 - (c) These are heads up for the potential Topicals that will affect TS
 4. TSTFs Under Development
 - a) TSTF 468, TSTF 360, RG 1.45 Leakage Monitoring
 - b) TSTF 468 and TSTF 360 by 12/31/06
 - c) TSTF 468 and 360 are candidates for CLIIP
 - d) The RG 1.45 RCS Leakage Monitoring TS by 3/31/07
- B. STS Updates
1. Hold off until 8-10 TSTFs approved to develop Rev 3.2
 2. NRC going to Microsoft Word and will no longer need WordPerfect files of the ISTS NUREGs
- C. Emerging Technical Issue
1. TSTF 360
 - a) TSTF plans to submit a revised TSTF 360 to NRC by 12/31/06 to allow for a Model SE and Model Application under CLIIP to be developed by the NRC in early 2007
 2. RCS Leakage Detection Instrumentation Sensitivity
 - a) Concern over instrumentation meeting the requirements of RG 1.45
 - b) NRC response to Quigley in 7/02
 - c) TSTF plans to develop a T Traveler Bases change to address this issue

- d) NRC advised TSTF a revision of RG 1.45 is being developed
 - e) TSTF asked for the opportunity to comment on this Rev 4 of RG 1.45
3. Non Condensable Gas Entrapment in ECCS Piping
- a) NRC is having a problem developing generic guidance
 - b) The NRC issues recognize gas entrapment occurs but is not sure how much gas entrapment is acceptable
 - c) This issue is still under research and NRC not sure if there is a date
 - d) There is thinking in the NRC that the Tech Specs are not adequate
 - e) TSB believes Tech Spec changes will be required
 - f) TSTF wants to be involved with TSB to determine appropriate Tech Spec requirements
4. Revision of Table of Contents of Technical Specifications Table of Contents Under 50.92
- a) The TOC are not a part of Tech Specs in accordance with 50.36 but the licensee should make the necessary changes to the TOC
 - b) NRC position is that if a licensee has an amendment number on the TOC it should be submitted with the LAR; but if not, it is not required but recommended
5. Diablo Canyon LAR Withdrawal Letter Regarding COLR
- a) TSTF disagrees with the NRC position stated in the Diablo Canyon LAR
 - b) TSB is not aware of any generic activity to change how COLR is handled in TS
 - c) RSB has some concerns over relocating the date and revision of the Topicals/Methodologies
 - d) TSB will monitor the issue
6. MSIV Actuation Train Operability Requirement for SSC with the 100% Capable Support System
- a) This is a generic issue that needs to be addressed generically
 - b) **(TSTF Action)** TSTF will develop a White paper and establish a schedule to meet with NRC to develop generic guidance
- D. Administrative Issues
- 1. TSTF may continue to use EIE

VII. PUBLIC PARTICIPATION

VIII. NEXT MEETING

- A. November 30, 2006 at NRC