



FENOC VISION  
**People** with a strong safety focus  
delivering top fleet operating performance.

# IMPROVED TECHNICAL SPECIFICATION CONVERSION

# Overview

- ◆ Introduction
- ◆ Describe the project
  - 2 year project with 4 phases
  - SITE Project
    - Core Team
    - Designated Reviewers
    - PORC and CNRB approvals
  - NRC Approval and Implementation in parallel during the last year
- ◆ Discussion Topics, to include:
  - Anticipated RAI process
  - BSI Definition / Disposition
  - Approach on Travelers
  - CTS LAR Incorporation
  - NRC Resources and 2007 Schedule Support

# Introduction

- ◆ Davis-Besse / FENOC / EXCEL Personnel
  - Robert Schrauder, Director Site Performance Improvement
  - Greg Dunn, Manager Fleet Licensing
  - William Bentley, Project Manager Improved Tech Spec Conversion
  - Ray Schiele, Project Manager EXCEL

# Introduction

- ◆ Desired Outcome is a mutual understanding on the following items:
  - Importance of the project
  - Maintaining consistency with best industry practices
  - Engagement & Commitment to the process
    - Take full advantage of the accelerated review process
    - Expectations for the review process
    - Participants in the process

# Introduction

- ◆ Scope of the ITS project
  - Prepare a License Amendment Request (LAR) to convert the Davis-Besse Current Technical Specifications (CTS) to the Improved Standard Technical Specifications (ISTS), NUREG 1430, Revision 3.1
  - Obtain NRC approval of the plant-specific Improved Technical Specifications
  - Complete all project phases in accordance with the project schedule and within the authorized project budget
  - Develop and implement an effective Change Management Plan which reinforces the need for change and fosters line organization ownership of the ITS
  - Assure event free implementation of the ITS

# Introduction

- ◆ Improved Technical Specifications (ITS)
  - One of Six Key Station priorities for the next 2 years
  - Significant Fleet Capital Expenditure
  - Supports License Renewal
  - Key Benefits
    - Improved Safety / Operational Performance
    - Eased Admin Burdens
    - Improved Regulatory Performance
    - Consistency with other fleet sites

# ITS Conversion

Conversion to the ITS is Accomplished in Four Phases:

- ◆ Initial Planning Stage
- ◆ License Amendment Request (LAR) Development
- ◆ Support of NRC Review and Approval
- ◆ Implementation

# Initial Planning Stage – Phase 1

Consists of the Following:

- ◆ Develop Project Plan
- ◆ Develop Project Schedule
- ◆ Identify the Project CORE TEAM
- ◆ Train CORE TEAM
- ◆ Develop Tracking Mechanisms



# Initial Planning Stage – Phase 1

## Project Plan:

- ◆ Detailed plan and schedule in place
  - General approach, roles and responsibilities, guidance documents, deliverables, performance indicators
- ◆ Core Team
  - Experienced in required technical disciplines
  - Knowledgeable in plant operation, change management, procedure control, regulatory control, and document control
  - Members from Operations, Engineering, Maintenance and Licensing

# Initial Planning Stage – Phase 1

## TEAM Initial Training

- ◆ CORE TEAM personnel
- ◆ Other key personnel (Subject Matter Experts)
- ◆ Training covers
  - Conversion process
  - how to use ITS conventions and ground rules
  - philosophies and concepts incorporated in ITS
  - major technical issues
  - Writers Guide and License Requirements

# Initial Planning Stage – Phase 1

Phase 1 Deliverables (Completed July 2006)

- ◆ Project Plan
- ◆ Interface Agreements with line organizations
- ◆ Detailed Schedule
- ◆ Communications Plan
- ◆ Performance Indicators
- ◆ Project Team Training

# LAR Development – Phase 2

The Development of the ITS includes three elements (July 2006 – July 2007):

1. Evaluation of the Screening Criteria
2. Individual and Integrated Review Packages
3. Technical Requirements Manual

# LAR Development – Phase 2

## Evaluation of the Screening Criteria

- ◆ A Split Report has been developed
- ◆ Confirms application of the Technical Specification Screening Criteria of 10 CFR 50.36 (c) (2) (ii)
- ◆ Line item comparison to the ITS NUREG
- ◆ Initial draft and finalized at the end of the development phase.

# LAR Development – Phase 2

## Evaluation of the Screening Criteria

- ◆ Draft Split Report will be utilized to identify
    - Which LCOs and which portions of LCOs meet the criteria for being retained in the ITS
    - Which are candidates for relocation to licensee controlled documents.
  - ◆ Includes a summary listing / matrix \*
  - ◆ Used to set the scope of each ITS chapter
- \* Handout of matrix from split report

# LAR Development – Phase 2

## Review Package Preparation/Review/Approval

### ◆ ITS Chapters

- Developed into plant specific Technical Specifications
- Format consistent with NUREG 1430, Rev 3.1
- Applicable Travelers incorporated

### ◆ Individual packages assembled

- NEI Conversion Guidance Document (NEI 01-03)
- Project Plan

# LAR Development – Phase 2

## Review Package Preparation/Review/Approval

### ◆ Licensing Package sections:

- Current Tech Spec markup
- Discussion of Changes
- ISTS and ISTS Bases markup
- Justification for Deviation from the ISTS
- No Significant Hazard Consideration
- Supporting Information



# LAR Development – Phase 2

## Review Package Preparation/Review/Approval

- ◆ Pre-meeting for each package
  - Core Team and Subject Matter Experts
  - Engage reviewers early on the split report, travelers, and any known issues or concerns
- ◆ Each package reviewed by core team and subject matter experts
- ◆ Post comment resolution meetings
  - Core Team and Subject Matter Experts
  - Ensure comments appropriately resolved
  - Consensus on global questions / issues
- ◆ PORC and CNRB review and approval
- ◆ 8 packages plus an integrated review

### Davis-Besse ITS Development

Task		Package Draft		Technical Reviews		Comments/ Validation Complete	PORC Review / Meeting	CNRB Review / Meeting
		Start	Complete	Start	Complete			
Pkg. 1: Split Report	Sched.	7/10/06	7/28/06	N/A	N/A	N/A	N/A	N/A
	Actual			N/A	N/A	N/A	N/A	N/A
Pkg. 2: 1.0 and 3.0	Sched.	7/24/06	7/28/06	7/31/06	8/4/06	8/25/06	9/12/06	10/9/06
	Actual							
Pkg. 3: 2.0, 3.1 and 3.2	Sched.	7/31/06	8/25/06	8/28/06	9/8/06	9/29/06	10/17/06	12/12/06
	Actual							
Pkg. 4: 3.3	Sched.	8/28/06	10/13/06	10/16/06	11/24/06	12/15/06	1/02/07	2/13/07
	Actual							
Pkg. 5: 3.8	Sched.	10/17/06	11/27/06	11/28/06	12/25/06	1/15/07	1/30/07	3/6/07
	Actual							
Pkg. 6: 3.4 and 3.5	Sched.	11/29/06	1/9/07	1/10/07	2/13/07	3/6/07	3/20/07	5/8/07
	Actual							
Pkg. 7: 3.6	Sched.	1/11/07	2/7/07	2/8/07	3/7/07	3/28/07	4/10/07	5/8/07
	Actual							
Pkg. 8: 3.7 and 3.9	Sched.	2/9/07	3/15/07	3/16/07	4/12/07	5/03/07	5/22/07	6/12/07
	Actual							
Pkg. 9: 4.0 and 5.0	Sched.	3/19/07	4/06/07	4/09/07	4/20/07	5/11/07	5/29/07	7/10/07
	Actual							
Integrated Package	Sched.	4/06/07	4/20/07	4/23/07	5/04/07	5/25/07	6/12/07	7/10/07
	Actual							

# LAR Development – Phase 2

## Review Package Preparation/Review/Approval

- ◆ Integrated review performed of entire submittal package upon completion of all individual package reviews
  - Ensure appropriate disposition of comments
  - System interface requirements between individual chapters are consistent
  - All open items identified during the development process are closed

# LAR Development – Phase 2

## Technical Requirements Manual

- ◆ TRM already in place and in ISTS format
- ◆ Location for SSC/LCO and associated details that are removed from CTS
- ◆ New chapters / sections
  - Created, reviewed and approved in accordance with site requirements

# LAR Development – Phase 2

## Phase 2 Deliverables (July 2007)

- ◆ Split report
- ◆ Plant Specific ITS and Bases
- ◆ Discussion of Change (DOC) Tables
- ◆ ITS LAR with all supporting documentation
- ◆ Submittal to NRC at completion of Phase 2  
– July 2007

# Support of NRC Review and Approval – Phase 3

## Accelerated Licensing Review Process Objectives:

- ◆ 6-8 month review process
- ◆ Single supplement prior to issuance of the SER
- ◆ Reduce licensee cost
- ◆ Reduce required NRC resources
- ◆ Reduce required amount of formal correspondence

# Support of NRC Review and Approval – Phase 3

## Accelerated Licensing Review Process

### ◆ Open Item Database

- Piloted at DC Cook.
- Used at Beaver Valley and Monticello.

# Support of NRC Review and Approval – Phase 3

## Accelerated Licensing Review Process

### ◆ Open Item Database

- Tracks all formal and informal issues
- Positively track issues to closure
- Establishment of issue ownership and schedule expectations
- Supports timely issue resolution / closure



# Implementation – Phase 4

The Implementation Plan has Two Major Elements (July 2007 – August 2008):

1. Project Scope
2. Project Execution

# Implementation – Phase 4

## Project Scope

- ◆ Define the processes
- ◆ Establish control mechanisms
- ◆ Site documentation impact
- ◆ Establish training requirements
- ◆ Establish the schedule

# Implementation – Phase 4

## Project Execution

- ◆ Writing and Revising
- ◆ Training
- ◆ Procedure conformance
  - New
  - More Restrictive

# Implementation – Phase 4

## Phase 4 Deliverables (August 2008)

- ◆ Detailed Implementation Plan
- ◆ Database with details on:
  - Scope
  - Impacted documents
  - Relocated Items / New Location
  - ITS requirement number and the implementing procedure or program number
- ◆ Approved procedures as needed to implement improved work processes
- ◆ ITS Training for all necessary personnel based on the needs of their position
  - Support Organization and SRO requal lesson plans
  - Training of Operators and Station Instructors
  - Revised exam bank questions and simulator scenarios
  - Training material for the ITS programs and procedure revisions

# Implementation – Phase 4

## Phase 4 Deliverables (August 2008)

- ◆ Project level procedures / instructions / guidelines needed to perform the work
- ◆ Revisions as needed to existing program documents and procedures
- ◆ Revision to ODCM as needed
- ◆ Commitment tracking annotations / dispositions as a result of ITS
- ◆ UFSAR changes as needed
- ◆ Project Control Documentation
  - Detailed Schedule
  - Performance Indicators
  - Monthly Progress Report
  - Project Closeout Checklist

# Lessons Learned

- ◆ Core Team and Subject Matter Experts
  - Strategy and Planning meetings
  - Correct skill sets and qualifications
- ◆ Development Open Items
  - Assigned to owners, scheduled, aggressively tracked to closure
- ◆ Conversion Ground Rules
  - Establish with the NRC (today's discussion topics)
- ◆ Implementation
  - Numerous for procedures/programs/training
  - Incorporated into the project plan

# Discussion Items / NRC Feedback

- ◆ Review Time for RAIs / Process
- ◆ Beyond Scope Items (BSI)
  - Definition and Schedule Impact
  - Reviewer Support / Project Training
  - Communication / Project Expectation
- ◆ ISTS Traveler Approach (Approved and Pending)
- ◆ More Restrictive Change Justification
- ◆ Removal of Brackets Justification
- ◆ CTS LAR Incorporation
- ◆ Value of Current Licensing Basis
- ◆ Weekly Management Calls / Communication
- ◆ NRC Resources and 2007 Schedule Support

# Summary

- ◆ 2 year project with 4 Phases  
(July 2006 – August 2008)
- ◆ Core Team of Ops, Maint, Eng, Licensing
- ◆ Subject Matter Experts from various disciplines
- ◆ PORC and CNRB approval
- ◆ Submittal planned for July 2007
- ◆ Desire to use the same Accelerated Licensing Review Process used at 3 other sites



### TSTFs planned for Davis-Besse ITS Conversion

Number	Description	Status
TSTF 402T	Clarification of "Required Features" in 3.8.1 Actions	Approved for Use
TSTF 471T	Eliminate use of term CORE ALTERATIONS in ACTIONS and Notes	Approved for Use
TSTF 494T	Correct Bases Discussion of Figure B3.0-1	Approved for Use
TSTF 427A	Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY	NRC Approves
TSTF 497A	Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less	NRC Approves
TSTF 412	Provide Actions for One Steam Supply to Turbine Driven AFW/EFW Pump Inoperable	Under NRC Consideration
TSTF 468	Follow Supported Systems Actions Due to an Inoperable MCC or Distribution Panel in lieu of ITS 3.8.9	Under NRC Consideration
TSTF 491	Removal of Main Steam and Main Feedwater Valve Isolation Times From Technical Specifications	Under NRC Consideration
TSTF 493	Clarify Application of Setpoint Methodology for LSSS Functions	Under NRC Consideration