December 28, 2006

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

FROM: Matthew Hamm, Reactor Engineer ***/RA/***
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF NOVEMBER 30, 2006, CATEGORY 2 MEETING WITH THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TO DISCUSS THE CURRENT STATUS AND ADMINISTRATIVE PROCESS FOR TSTF SUBMISSIONS, AND FUTURE TSTF SUBMISSIONS.

On November 30, 2006, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC), and representatives of the Technical Specifications Task Force (TSTF) at Excel Services Corporation, 11921 Rockville Pike, Suite 100, Rockville, MD 20852. The purpose of the meeting was to discuss the TSTF's generic changes to the Standard Technical Specifications (Travelers) under consideration for submission by the TSTF, to review in-process Travelers, and to discuss NRC administrative processes associated with TSTF submissions. The meeting generally followed the agenda proposed in a November 20, 2006, Public Meeting Notice (ML06239803930) as amended by the meeting participants.

The TSTF provided the NRC with the following documents for discussion during the meeting:
1. TSTF-400-A Analysis (ML063610264)
2. TSTF 2007 Priorities (ML063610266)
3. NRC Fee Report (ML063610269)
4. Industry CLIIP Status 2006A- 10-03-06 (ML063610276)
5. Mtg on RCS Leakage Detection Instrumentation Handout (ML063610273)
6. Mtg on ECCS Entrained Gas handout (ML063610270)

Enclosure 1 contains the minutes of the meeting, enclosure 2 contains a list of meeting attendees, and enclosure 3 is a TSTF address list. Meeting handouts, listed above with ML#'s are available in ADAMS. Please direct any inquiries to Matthew Hamm at 301-415-1472, or MEH1@nrc.gov.

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DISTRIBUTION:
ITSB r/f RidsNrrDirs RidsNrrDirsItsb TSTF Address List

ADAMS ACCESSION NUMBERS: ML063610262-package; ML063610239- memorandum; ML063610264-TSTF-400-A Analysis; ML063610266-TSTF 2007 Priorities; ML063610269-NRC Fee Report; ML063610276-Industry CLIIP Status 2006A- 10-03-06; ML063610273-Mtg on RCS Leakage Detection Instrumentation Handout; ML063610270-Mtg on ECCS Entrained Gas handout

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DATE	12/28/06	12/28/06

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Meeting Minutes

A meeting between NRC and the Technical Specifications Task Force (TSTF) was held on November 30, 2006, to discuss TSTF Travelers under consideration for submission by the TSTF, to review in-process TSTF Travelers, and to discuss NRC administrative processes associated with TSTF Travelers. The meeting followed the proposed agenda provided in a November 20, 2006, Public Meeting Notice (ML0623980393) as amended by the meeting participants. The following is a brief summary of the meeting.

I. Administrative Issues

The TSTF briefed NRC staff on upcoming personnel changes to the TSTF, and the TSTF's charter and business process. NRC discussed the NRR/NRO reorganization.

II. Process Issues

The TSTF and NRC discussed instructions for the administrative processing of the TSTF Travelers and scheduling milestones.

NRC briefed the TSTF on its intent to issue LIC-505, "Review of Technical Specifications Task Force (TSTF) Travelers for Incorporation into the Standard Technical Specifications and "CLIIP" Model License Amendments" near the end of the first quarter of the calender year. It was noted that the schedule sent in letter dated November 16, 2006, outlined the process and status of TSTFs currently under review.

During discussion of LIC-101, "Licensing Amendment Review Procedures," the TSTF requested clarification of the process for initial submissions of TSTFs that do not involve the Consolidated Line Item Improvement Process (CLIIP). NRC briefed the TSTF on NRC internal process for routing and processing of License Amendments. NRC will consider if additional guidance, possibly in the form of a Regulatory Issue Summary (RIS) or Generic Communication, is needed.

The TSTF requested NRC input on NEI 06-02, "License Amendment Request Guidelines."

The TSTF noted that administrative response times listed for TSTF-426 "Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b and 6c" and TSTF-486 "Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)" were originally listed as 60 days. The TSTF requested a 90 day response time for all requests for amplifying information and to be consistent with the schedule issued by NRC on November 16, 2006. NRC will revise response times for TSTF-426 and 486 to 90 days via a letter.

The TSTF presented NRC with handout "TSTF 2007 Priorities" for comment. NRC acknowledged the TSTF priorities and stated that NRC resources were not available to provide input to "TSTF-GG-05-01 Writer's Guide for Plant-Specific Improved Technical Specifications."

III. Public Participation Invited - No Comments Received

IV. Discussion of Specific Traveler Review Issues

The TSTF and NRC discussed several issues with specific TSTF Travelers currently under review.

The TSTF submitted handout “NRC Review Fee Report,” and stated that fees incurred for TSTF-490 "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec” and TSTF-491"Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications” do not appear to correlate with the level of complexity involved in the changes. NRC understands the concern and will periodically look for significant deviations. NRC noted that the TSTF should continue to bring such issues to NRC’s attention.

The TSTF stated that TSTF-426 “Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b and 6c” has been the subject of multiple correspondence exchanges, and asked why the staff has not revised TSTF-426 in response to the TSTF comments. NRC briefed the TSTF on the history of TSTF-426, the need for the Traveler to be consistent with the approved Topical Report, and proposed that the TSTF meet with the technical staff involved. The TSTF will determine the feasability of a meeting with NRC staff regarding TSTF-426.

The TSTF confirmed NRC receipt of responses to Requests for Amplifying Information (RAI’s) for TSTF-475 “Control Rod Notch Testing Frequency and SRM Insert Control Rod Action.” NRC stated it could not confirm having received a related GE Topical Report.

NRC discussed concerns identified during the acceptance review for TSTF-493 “Clarify Application of Setpoint Methodology for LSSS Functions.” The TSTF proposed to submit a revised TSTF. NRC will close the existing TAC and open a new TAC once the TSTF submits a revised TSTF-493.

V. New Issues

NRC and the TSTF discussed emerging Issues with previously-approved TSTFs.

During discussion of TSTF-400 Rev 1 “Clarification of Surveillance Requirement on Bypass of Noncritical DG Automatic Trips,” the TSTF submitted handout “TSTF-400-A, Rev. 1, Clarify SR on Bypass of DG Auto Trips.” The TSTF feels that NRC should approve the submitted plant specific amendments. NRC stated that both NRC and the TSTF need more information before continuing discussions. NRC stated that Reg Guide (RG)1.9, “Selection, Design, Qualification, and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants,” is under revision at this point to clarify critical and non-critical tests. The TSTF will confer with Catawba and McGuire personnel to obtain more information.

The TSTF stated that licensee’s have been approaching the TSTF with many questions related to model applications for TSTF-374 Rev. 0 “Revision to TS 5.5.13 and associated TS Bases for Diesel Fuel Oil.” NRC will endeavor to update and clarify information available on the NRC website regarding TSTF-374.

VI. CLIIP Status

The TSTF submitted handout “CLIIP Adoption Status” and stated that it feels the CLIIP is clearly working. The TSTF provided a rough average of 180 days from submission to

approval for CLIIP submissions over the 2002 to 2005 period. The TSTF offered to share NEI tracking database with NRC.

VII. Future Planning

The TSTF briefed NRC on several items it will be working on in the near future.

The TSTF will contact plants and request input regarding TSTF-360 "DC Electrical Rewrite." TSTF plans to submit a Traveler to NRC in Spring 2007.

The TSTF may submit paperwork to define and clarify verbiage and syntax between BWR's and PWR's. The TSTF is considering BASES changes to LCO 3.0.8.

The TSTF will bring STS updates together possibly as late as Fall 2007.

The TSTF reiterated its request for NRC review and approval of the Writer's Guide. NRC restated its lack of resources available for review and endorsement.

VIII. Next Meeting

A tentative date of March 22, 2007, was set for the next quarter's meeting. NRC suggested setting a public meeting specifically for process issues.

IX. Public Participation Invited - No Comments Received

X. Break

XI. Potential Submission of TSTF Traveler for Reactor Coolant System (RCS) Leakage Detection Instrumentation TS's

Current RCS Leakage Instrumentation TS may require that a gaseous activity monitor be capable of detecting a 1gpm RCS leak within an hour. Due to the fact that the integrity of the fuel is greater today than in the past, the gaseous activity monitor may no longer be capable of detecting a 1gpm RCS leak within an hour. As a result, TS regarding RCS Leakage Instrumentation may need to be modified to reflect current plant conditions.

The TSTF presented a letter dated July 18, 2002, from Brian Sheron of the NRC to Barry Quigley as a means of justifying a proposed TSTF solution to the issue mentioned in part B above. The TSTF then presented handout "PWROG White Paper: Proposed Annotation to LCO 3.4.15 Bases." A proposed TS change would revise the RCS Leakage Detection TS Bases to redefine the operability of gaseous radiation monitor in terms of its sensitivity to radiation activity levels.

The NRC staff pointed out a perceived deficiency in the proposed TS changes. NRC stated that by defining the operability of the system solely in terms of gaseous activity detector sensitivity, the revised TS would consider a gaseous radiation monitor to be operable for leakage detection, when in actuality, it would not provide adequate information related to how long it would take to detect a 1 gpm leak using the gaseous radiation monitor. Therefore, NRC feels it could not serve the function of this TS, (i.e. to detect the leakage levels within a specified time frame). The staff reviewed a similar TS change proposal for Callaway and found it not acceptable.

NRC stated it issued Information Notice (IN) 2005-24, “Nonconservatism in Leakage Detection Sensitivity,” informing all licensees that their gaseous radiation monitors may not have the capability to detect RCS leakage of 1 gpm in one hour because of the improvements in fuel performance and RCS chemistry control. In response to the IN, some licensees submitted TS changes that would remove gaseous radiation monitor from the TS for leakage detection and demonstrated that the remaining leak detection methods in the TS would be sufficient in satisfying the capability and diversity guidance in RG 1.45, “Reactor Coolant Pressure Boundary Leakage Detection Systems.” NRC staff believes that this is an acceptable generic resolution.

The TSTF stated it believes gaseous activity monitor should be maintained in TS control. The TSTF suggested modification of conditional statements and required compensatory actions as well as making the compensatory actions more rigorous for the case of having only gaseous activity monitor available as the method of leakage detection.

XII. Public Participation Invited- No Comments Received

XIII. Break

XIV. Potential Application of the TSTF Traveler and CLIIP to Address TS Concerns Regarding Emergency Core Cooling (ECCS) Gas Management

NRC briefed the TSTF on ECCS gas entrainment and binding issues and possible methods to address the issues. NRC gave a description of a Proposed Generic Letter pertaining to ECCS gas issues that may be released for comment.

The TSTF presented handout containing SR’s for ECCS system from NUREG-1431, Vol. 1, Rev. 3.0. The TSTF believes improvements can be made to SR’s related to ECCS.

The TSTF requested guidance from NRC as to its possible actions before the Generic Letter is issued and requested that NRC keep them informed.

XV. Public Participation Invited - No Comments Received

XVI. Adjourn

November 30, 2006 NRC-TSTF Meeting Attendance

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