



U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation ***NRR OFFICE INSTRUCTION***

Change Notice

Office Instruction No.: LIC-600

Office Instruction Title: Review of Technical Specifications Task Force (TSTF) Travelers and Creation of "CLIP" Model Applications

Effective Date: March 26, 2007

Approved By: J.E. Dyer

Date Approved: March 22, 2007

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Responsible Organization: NRR/ADRO/DIRS/ITSB

Summary of Changes: This is the initial issuance of LIC-600. The objective of this office instruction is to define the process for review of travelers submitted by the industry's Technical Specifications Task Force (TSTF) for potential creation of "CLIP" model license amendment request applications.

Training: Self-study by Technical Specifications Branch (ITSB)

ADAMS Accession No.: ML070310439



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NRR OFFICE INSTRUCTION

LIC-600

Review of Technical Specifications Task Force (TSTF) Travelers and Creation of "CLIP" Model Applications

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NRR OFFICE INSTRUCTION

LIC-600

Review of Technical Specifications Task Force (TSTF) Travelers and Creation of "CLIIP" Model Applications

1. **POLICY**

It is the policy of the Office of Nuclear Reactor Regulation (NRR) to establish procedures and guidance for its staff to meet the requirements and performance goals established in legislation, regulations, the Agency's strategic plan, and office-level operating plans. Completion of reviews of changes proposed by the industry's Technical Specification Task Force (TSTF) to enhance the Standard Technical Specifications (STS) supports the NRC's Effectiveness & Efficiency Goals.

Through its website at <http://www.nrc.gov/reactors/operating/licensing/techspecs.html>, the NRC provides guidance to stakeholders on the STS and how changes to the STS proposed by the TSTF are reviewed.

2. **OBJECTIVE**

Proposed changes to the STS are submitted by the TSTF or proposed by the NRC staff, and are called travelers. The objective of this office instruction is to define the process by which NRR staff reviews TSTF Travelers for development of model license amendments. The instruction describes how to produce, and solicit comments on, the staff's safety evaluation (SE) and proposed no significant hazards consideration (NSHC) determination before finalizing acceptance of a TSTF Traveler. The instruction implements portions of the process described in NRC Regulatory Issue Summary (RIS) 2000 06, "Consolidated Line Item Improvement Process [CLIIP] for Adopting Standard Technical Specifications Changes for Power Reactors," March 20, 2000.

This office instruction describes the process from submission of the TSTF Traveler to publication of a Notice of Availability (NOA) in the Federal Register (FR) of a "CLIIPed" model amendment (or rejection of the TSTF Traveler if appropriate). The actual application for, and review of, a license amendment request (LAR) is beyond the scope of LIC-600 -- see LIC-101 "License Amendment Review Procedures" for LAR review guidance.

3. **BACKGROUND**

3.1 Standard Technical Specifications

As stated in NRC Administrative Letter 96 04, "Efficient Adoption of Improved Standard Technical Specifications," October 9, 1996, total adoption of the STS substantially improves the efficiency of the regulatory process, and ensures that licensee and NRC resources are applied to significant safety matters.

It is the policy of the NRC, as stated in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," (58 FR 39132) that the STS be maintained for each of the Nuclear Steam Supply Systems (NSSS) Owners Groups (OGs).

In 1992, the NRC issued the first version of the STS¹ to clarify the content and form of requirements necessary to ensure safe operation of nuclear power plants in accordance with 10 CFR 50.36. Revision 1 of the STS was published in April 1995, Revision 2 was published in April 2001, Revision 3 was published in June 2004, and Revision 3.1 was posted on the NRC's website at

<http://www.nrc.gov/reactors/operating/licensing/techspecs/current-approved-sts.html>.

TSTF Travelers are the means by which the NRC maintains the STS NUREGs. Once approved, the TSTF Traveler generally is added into a future version of the STS. The actual publication and updating of the STS by incorporation of approved TSTF Travelers is done on an as-needed basis.

3.2 Example TSTF Traveler

An example of a traveler is TSTF-459, "Provide an Exception to the Requirement to Have One RHR Shutdown Cooling System in Operation" (ML060440645). The change requested by the traveler is shown in part below:

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.9 Residual Heat Removal (RHR) Shutdown Cooling System - Cold Shutdown

LCO 3.4.9 Two RHR shutdown cooling subsystems shall be OPERABLE, and, with no recirculation pump in operation, at least one RHR shutdown cooling subsystem shall be in operation.

-----NOTES-----

1. Both RHR shutdown cooling subsystems and recirculation pumps may be removed from operation provided RCS temperature is \leq [200]°F for up to 2 hours per 8 hour period.
2. One RHR shutdown cooling subsystem may be inoperable for up to 2 hours for the performance of Surveillances.

The above example shows how the proposal would modify the STS to replace a time-based restriction with a temperature-based requirement. The proposed traveler is typical in that it would change a portion of a limiting condition for operations. Other travelers seek to clarify definitions, bases, or administrative sections of the STS.

The submittal to the NRC typically assigns review fees to an owner's group, or requests a fee exemption. The submittal has a description, proposed change, background, technical analysis, regulatory analysis, proposed NSHC determination, Applicable Regulatory Requirements/Criteria, Environmental Consideration, references, and a markup of the proposed changes.

¹ NUREGs 1430 - 1434, Vols. 1 & 2, STS and Bases for Babcock and Wilcox Plants, Westinghouse Plants, Combustion Engineering Plants, General Electric Plants, BWR/4, General Electric Plants, BWR/6, respectively.

3.3 TSTF Travelers as "CLIP" License Amendments

As described in RIS 2000-06, the CLIP facilitates licensees' adoptions of NRC-accepted changes to the STS as line-items. This process streamlines the license amendment review process involving NRC-accepted STS changes, increases NRC efficiency, and reduces unnecessary regulatory burden.

The NRC role in maintaining plant safety is achieved by the technical review of proposed changes to the STS as well as plant-specific applications to adopt NRC-accepted changes to the STS. In addition, the CLIP increases public confidence by making NRC's work-process more visible to its stakeholders through use of the Federal Register. A notice for comment and a notice of availability are published in the Federal Register as part of the review process for a CLIP. The CLIP improves the efficiency of the NRC licensing processes by reviewing and documenting STS change requests in a manner that supports subsequent license amendment applications. By soliciting comments from NRC stakeholders, the CLIP enhances the visibility of the staff's review and revision process for the STS as well as subsequent license amendment applications. Following the staff's resolution of public comments on a proposed change to the STS, licensees may submit a LAR to adopt the NRC-accepted change by citing the relevant information made available during the CLIP approval process.

Using the TSTF Traveler process to change the STS improves the efficiency of the licensing process by allowing the staff to review and approve a proposed change that will be used and referenced in the preparation of LARs by multiple licensees following approval of the TSTF Traveler. The TSTF Traveler provides the model technical and regulatory bases for a LAR. Because of the efficiency gains, the NRC concluded that TSTF Travelers should be "CLIPed" whenever possible.

The NRC's Technical Specifications website at <http://www.nrc.gov/reactors/operating/licensing/techspecs/post-revision3-sts.html> provides the status of TSTF Travelers under review, closed, approved, and CLIPed. It also provides links to associated documents in the NRC's Official Agency Record (OAR) system called ADAMS (for "Agencywide Documents Access and Management System"). The website also shows links to the FR where appropriate.

4. BASIC REQUIREMENTS

4.1 Overview and Milestones of the TSTF Traveler Process

The TSTF Traveler review process begins at identification of a proposed change to the standard technical specifications and ends with publication of either a rejection or publication in the Federal Register of a NOA of a model application. If a Traveler is submitted to the NRC, the staff will review it in a manner that is similar both to the topical report review process described in LIC-500, "Processing Requests for Reviews of Topical Reports" and to the LAR review process described in LIC-101. Typically, there will be requests for additional information, publication of proposed changes for public comment, and final notification of availability of model applications. On occasion, a TSTF Traveler will be approved via letter, and a model will not be published in the Federal Register. It is important to note that there is no Part 50 license directly and immediately affected by approval or denial of a TSTF Traveler, nor by publication of a NOA.

The external milestones or scheduled dates during the review are established via formal letter from the NRC to the TSTF. An example of the milestones is:

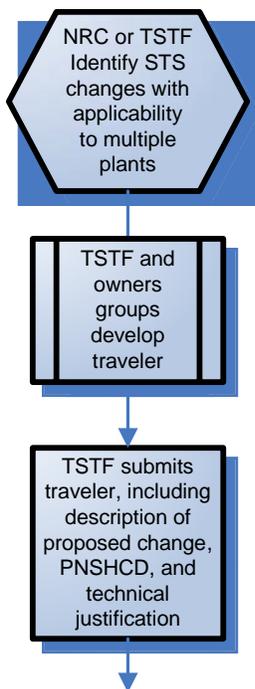
| Milestones for Non-CLIP review of TSTF Traveler 495, Rev. 0, "Bases Change to Address GE Part 21 SC05-03." | Schedule Date |
|--|---------------|
| Receive TSTF 495, Rev. 0 for review (TAC No. MD2672 Application Date) | 7/18/06 |
| Issue Request for Additional Information (RAI), if applicable | 1/15/07 |
| Receive TSTF RAI response letter, if applicable | 4/15/07 |
| Issue Draft TSTF Traveler to Federal Register Notice for Comment (FR NFC) | 8/15/07 |
| Issue Final TSTF Traveler Federal Register Notice of Availability (FR NOA) | 10/30/07 |

(Source: ML062790178)

The milestones above reflect the major NRC-TSTF interactions and major publications placed in the Federal Register. There are many additional less-visible, but equally important steps detailed in Section 4.2 of this office instruction.

A graphic overview of the TSTF Traveler process was published in RIS 2000-06. The process is shown in more detail in the figures throughout in this office instruction.

4.1.1 Industry Work Before Initial NRC submittal



Before the NRC gets involved, the industry's task force considers a proposed change and, if accepted, either submits the traveler to the NRC for review directly or gives a "T" designation to the traveler and makes it available as a model for plant-specific amendment requests. For the owner's groups, the processing of suggested changes is currently administered by the TSTF. In general, a plant or industry group proposes a change to the STS, and provides a description, justification, and marked-up STS indicating the change. The TSTF will act on changes that meet a minimum significance threshold and are potentially generic. The minimum threshold was developed by the TSTF and the NRC as:

Technical Specifications - *any technical or administrative error that could reasonably lead to a misinterpretation of the technical specification, or technically incorrect information*

Bases - *any significant error that could reasonably lead to misinterpretation of the technical specification, or technically incorrect information*

If the change is approved, it is forwarded to the TSTF Technical Coordinator. The representatives of the various OGs and NSSS designs who are on the task force determine if the proposed change is applicable to their plants.

After the internal reviews and approval, the task force formally submits the TSTF Traveler to the NRC for review.

Irrespective of any TSTF action, the NRC may impose a change to the STS if necessary. Historically, this has not been necessary; the preferred method to change the STS is through the TSTF Traveler process, thus involving the various stakeholders.

4.1.2 NRC Role Overview

NRR's Technical Specifications Branch (ITSB) has the responsibility for managing the NRC's portion of the TSTF program. An ITSB staff member is designated as the coordinator of the overall TSTF program. Also, an ITSB staff member is designated as the lead reviewer for a proposed TSTF Traveler. Where multiple sections are involved, the branch chief will assign one reviewer as lead. A list of the assigned reviewers and the status of the TSTF Travelers under review are available on the NRC's website at <http://www.nrc.gov/reactors/operating/licensing/techspecs/>.

The review of a TSTF Traveler is similar to a review of an LAR, but no specific Part 50 license is initially involved. The proposed change is processed into the NRC's work control programs, branches are assigned various levels of reviews, milestones target dates are set, etc., just like with an LAR. Notifications to the public are made via the Federal Register.

A desirable change to the STS may also be identified by the NRC. Review or approval by the owners groups and the TSTF is not required for the NRC to change the STS. However, it is anticipated that a needed change identified by the NRC would be communicated to the TSTF, who in turn would consult with the various plants about the identified change, and create a traveler or engage the NRC to discuss why the change would not be appropriate. Since many plants have already adopted the STS, the NRC must assure that any needed change to the STS is screened for impact on existing plants (i.e., need for generic communications, need for an order, etc.)

4.1.3 End Product

The end product of an approved TSTF Traveler may be: 1. An administrative, non-technical change to one or more STS NUREGs (following incorporation into the STS); 2. A model license application associated with the approved TSTF Traveler, which a licensee may use as a model for a LAR; 3. A model NRC SE and proposed NSHC determination for publication as a CLIP in the FR which the licensee may directly use and incorporate by reference; and/or, 4. A review plan that specifies the NRC branches involved in the review of plant-specific LARs, referencing the TSTF traveler and the anticipated review criteria.

In addition to dissemination to the stakeholders and the public via the FR NOA, the models are placed ADAMs, and posted on the ITSB website at <http://www.nrc.gov/reactors/operating/licensing/techspecs/>

4.2 TSTF Traveler Review Timetable and Discussions

The NRC has formalized the scheduling of TSTF Traveler review. In a letter dated November 16, 2006 (ML062980397), the NRC provided the TSTF with TSTF Traveler

schedule milestones which superseded any previously agreed dates. The specific dates provided in the attachment to the November 16 letter were:

| Milestone Dates | Meaning |
|------------------------|---|
| Application | This is the date the application was received by the NRC. |
| RAI Issued | This is the projected date a Request for Additional Information (RAI) will be available to the TSTF. |
| RAI Response | This is the date when TSTFs RAI response letter will be available to technical staff. |
| FR NFC | For TSTF Travelers that will CLIPed, this is the date that a Notice for Comment for both the model application (Model LAR) and safety evaluation (Model SE) will be published in the Federal Register. This date is not applicable for non-CLIP travelers. |
| FR NOA | For CLIP Travelers, this is the date of publication of the Notice of Availability of the model application (Model LAR) and safety evaluation (Model SE) in the Federal Register. For non-CLIPed travelers, there is no NOA. Instead, the date is the date of the letter approving the TSTF traveler. |

The dates in the November 16 scheduling letter reflect major milestones that are publicly visible. There are many additional steps taken during the review of a proposed TSTF Traveler. Not all of those steps are visible externally, but they all impact the overall review schedule. These steps include:

| No. | Task | Time | Responsibility |
|------------|---|-------------|-----------------------|
| 1 | Pre-submittal meetings | n/a | TSTF, ITSB, others |
| 2 | TSTF submits request for review to Document Control Desk (DCD) following 10 CFR 50.4. | n/a | TSTF |
| 2.a | TSTF submits fee-exemption request to Office of Chief Financial Officer (OCFO) per 10 CFR 170.5. (optional) | n/a | TSTF |
| 3 | DCD enters request into ADAMS, distributes TSTF Traveler via E-RIDS | 0 | DCD |

| No. | Task | Time | Responsibility |
|-----|---|---|---|
| 4 | ITSB assigns lead reviewer | upon receipt | ITSB |
| 5 | Fee-Exemption Requests dispositioned. | Within 30 days of application receipt | CFO, ITSB |
| 6 | Request TAC through TRIM; a Blue Sheet will be generated by the Work Planning Center (WPC) when the TAC Request is approved. | Within 5 days of application receipt or upon final fee determination | ITSB TSTF Program Manager |
| 7 | Return Blue Sheet with requested Milestone Target Dates the WPC. Work Planning and Characterization Form (Green Sheets) will be generated and distributed by the WPC upon receipt of the blue sheet. | Within 14 days of TAC approval and Blue Sheet generation | ITSB TSTF Program Manager, ITSB Lead reviewer |
| 8 | Complete and return the Green Sheets to WPC for processing and forwarding to ITSB Lead. | Within 14 days of receipt of Green Sheet | Technical Branches |
| 9 | Perform acceptance review and notify ITSB lead of result. | As indicated on Green sheet | Technical Branches |
| 10 | Work with TSTF to establish agreed-upon review schedule milestones and document in a letter from ITSB to TSTF OR in a letter from ITSB to TSTF, document reasons why TSTF did not pass acceptance review. | Within 30 days of receipt of Technical Branch acceptance review determinations | TSTF, ITSB, Technical Branches |
| 11 | Provide Request for Additional Information (RAIs) to ITSB (if needed). | As indicated on Green Sheet (Should be scheduled at least 2 weeks before step 12) | Technical Branches |
| 12 | Provide RAIs to TSTF and discuss proposed RAIs with the applicant. | Within the agreed-upon milestone schedule | Technical Branches, ITSB |
| 13 | TSTF provides RAI response to ITSB Lead. | Within the agreed-upon schedule (approx 60-90 days) | TSTF |
| 14 | Provide SE to ITSB lead reviewer, <i>include review plan in SE.</i> | As indicated on Green Sheet (Schedule at least 4 weeks before step 15) | Technical Branches |

| No. | Task | Time | Responsibility |
|-----|--|---|-------------------------------|
| 15 | ITSB prepares draft CLIP package. | Within the agreed-upon milestone schedule | Technical Branches, TSB, OGC |
| 16 | Publish draft CLIP package in FR. | Within agreed-upon milestone schedule | ITSB, ADM/RDB |
| 17 | Receive comments on change and draft SE, etc., from TSTF. | Within by Federal Register Notice (FRN) schedule, typically a 30-day comment period | ITSB, ADM/RDB |
| 18 | Technical Branch provide ITSB Lead with Technical Branch's response to public comments. | Within two weeks of receipt of comments, or upon agreed schedule | Technical Branches, ITSB, OGC |
| 19 | Reconsider, reject, or amend TSTF Traveler, proposed NSHC determination, and SE as appropriate. | Within two weeks of comment resolutions, or upon agreed schedule | ITSB |
| 20 | If approved, publish Notice of Availability of TSTF Traveler, proposed NSHC determination, and the SE on the NRC website via letter and FRN (if using CLIP). | Within NRC Web and ADAMS Public Document Release timelines and FR timelines | ITSB |
| 21 | TAC Management | Continuous | ITSB |

4.2.1 Pre-submittal Meeting

A pre-submittal meeting is not required to begin the TSTF Traveler review process. However, the TSTF should be encouraged to discuss plans for future submissions. Staff is reminded that record-keeping requirements and public-meeting requirements might apply, depending on the information discussed. Staff are to consult COM-202, "Meetings With Applicants, Licensees, Interveners, Vendors, or Other Members of the Public," COM-203 "Informal Interfacing and Exchange of Information with Licensees and Applicants," COM-204 "Interfacing with Owners Groups, Vendors and NEI," and other applicable procedures to decide on notice and record keeping requirements.

If a meeting is needed, the ITSB lead reviewer notifies the appropriate branch chiefs and arranges the meeting. The technical branch chiefs and selected technical staff participate in the meeting. The TSTF will brief the staff on the need, purpose, scope, and methodology for the TSTF Traveler and whether they plan to ask for a fee exemption. If the applicant is considering requesting a fee exemption, a representative from the OCFO should attend the meeting.

The staff should provide feedback to the applicant on the proposed TSTF Traveler. The staff should use their knowledge and experience to inform the applicant of the level of detail they expect in the TSTF Traveler. The feedback can include an estimate of the number of review hours and the review schedule the staff can support based on the limited information the staff has received in the meeting. Since the staff has not seen the TSTF Traveler, the staff will stress to the applicant that these are preliminary estimates only and more realistic estimates will be made when the TSTF Traveler is submitted.

The staff should also inform the applicant if the TSTF Traveler does not meet the criteria for acceptance. Since this meeting is a briefing on the proposed TSTF Traveler, the staff cannot provide a formal determination whether the proposed TSTF Traveler will be acceptable or not. However, the staff should provide their best and candid insights on the merits of the TSTF Traveler and clearly communicate the problem areas they see in the proposed TSTF Traveler.

The staff should ask appropriate questions to elicit information on the relationship of the proposed TSTF Traveler to any other ongoing or proposed staff or industry efforts and any other information that could affect a subsequent staff decision on acceptability of the proposed TSTF Traveler.

4.2.2 TSTF submits request for review

Following approval by the TSTF, the traveler is submitted to the NRC for review.

The TSTF started using the Electronic Information Exchange (EIE) process described in 10 CFR 50.4(a) in October 2005; the NRC anticipates most TSTF correspondence to be through EIE. There are several advantages, including automatic entry into ADAMS and a reduction on optical character recognition (OCR) errors in the records in ADAMS. The TSTF typically has used the Adobe Acrobat Portable Document File (PDF) for travelers. PDF files that are submitted to the NRC by external sources must be submitted following NRC's guidance for electronic submittals which can be found at <http://www.nrc.gov/site-help/eie/guid-elec-submission.pdf>. The Document Processing Center (DPC) checks these incoming electronic (PDF) submittals for compliance with NRC standards and those that do not comply are returned back to the submitter to resolve processing issues.

The lead reviewers should not accept submittals sent directly to the reviewer, whether by e-mail or by paper, because the acceptance circumvents the NRC's recordkeeping functions of the Document Control Desk.

If the staff receives "written communications" or an electronic file (e.g., e-mail attachment, CD-ROM) directly from an external source such as the TSTF, then the staff member should ask the provider to submit the document using EIE. If they are unwilling or unable, the staff may use the NRC Form 665S or 665P to send the communication to the DPC for ADAMS processing.

If there is a fee exemption request, then the submission must also be sent following the instructions in 10 CFR 170.5.

4.2.2a TSTF Submits Fee-Exemption Request (optional)

Part 170 imposes additional requirements for fee exemption for document submission, 10 CFR 170.11(a)(1)(iii)(A)(3) states the fee exemption applies only when "The fee exemption is requested in writing to the Chief Financial Officer in accordance with 10 CFR 170.5, and the Chief Financial Officer grants this request in writing." 10 CFR 170.5 "Communications," requires that all communications concerning the regulations in Part 170 should be addressed to the NRC's CFO. The NRR personnel should assure that any submission with a fee exemption is appropriately addressed to the CFO.

Reviews of TSTF Travelers are normally subject to fees based on the full cost of the review. However, the TSTF has been granted fee waivers in the past in accordance with 10 CFR 170, "Fees for Facilities, Materials, Import and Export Licenses, and Other Regulatory Services under the Atomic Energy Act of 1954, as Amended."

The disposition of fee exemptions is discussed in Section 4.2.5 below.

4.2.3 TSTF Traveler Entry into ADAMS, Electronic Distribution, SUNSI Review

As stated in ADM-304, "ADAMS Document Submission and Use," externally-generated paper documents received in the NRC Mail Room will be scanned into ADAMS and distributed by Office of Information Services (OIS) via E-RIDS to either GroupWise organizational mailboxes and/or individual accounts. Recipients will receive e-mail notification of the document in ADAMS. Documents received in electronic form through the EIE program will be entered into ADAMS by the DPC and distributed by OIS via E-RIDS to either GroupWise mail boxes or to individual accounts. See ADM-305 "E-Rule Implementation in NRR" for more information on including E-RIDS Distribution Lists.

Incoming TSTF submissions are profiled as non-public pending review. This prevents the public from seeing and commenting on the traveler, so additional steps are required to facilitate public release. The ITSB Lead needs to assure that the proper information security reviews are done. The ITSB Lead needs to verify that the TSTF Traveler does not contain sensitive unclassified non-safeguards information (SUNSI), privacy information, or other non-public material. See <http://www.internal.nrc.gov/security.htm> for links to screening guidance. The ITSB lead will document this review via a form 665 or in e-mail to the ADAMS support personnel. ADAMS support will then release the document using a normal release schedule.

TSTF Travelers are not anticipated to be proprietary. If a TSTF Traveler is submitted with proprietary information, the ITSB lead reviewer is to follow appropriate guidance, including 10 CFR 2.390 and LIC-204 "Handling Requests to Withhold Proprietary Information from Public Disclosure."

4.2.4 ITSB Assigns Lead Reviewer for Traveler

The ITSB branch chief will assign a lead reviewer to each incoming traveler. The normal leads and backups may be viewed by following the links on <http://www.nrc.gov/reactors/operating/licensing/techspecs.html>

The lead performs duties similar to a PM for the TSTF Traveler, in that they coordinate the NRR activities related to the review. The lead is responsible screening the incoming

documents for public release, reviewing the proposed TSTF Traveler, implementation dates, and other information and determining what input from other branches should be requested. The lead also provides updates to the ITSB TSTF project manager for use in updating related web pages. The lead also determines what type of public notification is required for meetings on the traveler. The lead is the primary contact for RAIs related to the traveler. The lead assembles the SEs from all the reviewers in to a single SE, proposed NSHC determination, and model LAR. The lead coordinates the notice for comment and resolves any public comments. The lead prepares correspondence regarding any final notification of TSTF approval, denial, or revision. Finally, the lead prepares the notification of availability for submittal to the Federal Register.

4.2.5 Address Fee Exemption Request, if Any

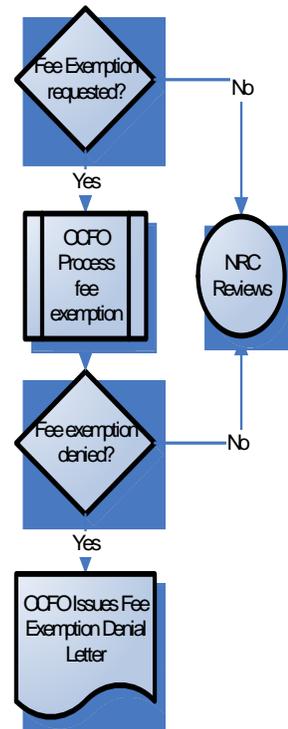
The TSTF has requested and been denied blanket fee exemptions for TSTFs (see Letter from CFO to TSTF dated June 14, 2006, ML061650078). The requirements for Part 170 were discussed with the TSTF at a public meeting on October 13, 2005 (ML052990487). During the meeting, members of the CFO's office presented fee waiver requirements from 10 CFR 170.11. To receive a fee exemption, a requestor has to demonstrate that the document submitted for NRC review is specifically for the purpose of supporting NRC's generic regulatory improvements. Fees will not be waived for reviews that primarily benefit the organization submitting the request/report. An example of the type of document that does not meet the fee waiver criteria is a topical report (TR) submitted for the purpose of obtaining NRC approval so that the report can be used by the industry in the future to address licensing or safety issues.

If a fee exemption has been requested, then OCFO must issue a letter approving the exemption before the review can commence.

The NRC does not begin its review until it decides whether to grant the fee exemption. If the exemption is denied and the TSTF still wants the TSTF Traveler reviewed, the applicant must submit a letter requesting a fee-billable review or have provided the instructions with the original submittal. Reviewers in NRR must not perform work on the TSTF until any fee exemption request is resolved. Since there is no TAC # assigned before the fee review is complete, staff cannot charge for review hours.

NRR and the ITSB will usually be involved in drafting a memo from NRR to the CFO's office or providing other assistance to the CFO to assess the fee exemption. A sample (non-public) letter from NRR to the OCFO may be viewed at ML060410417. Work on the memo will be charged an overhead TAC #, since the proposed traveler will not yet have a TAC #.

The fee review goals of the CFO are generally resolved within a month of the TSTF's request. A sample of the CFO's granting letter may be viewed at ML060620213. ITSB should work closely with the CFO's office to assure the letters are addressed to the correct people.



4.2.6 Request a TAC

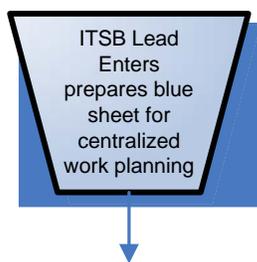
Before work begins on a TSTF Traveler, a TAC number must be requested. The ITSB Lead is responsible for obtaining a TAC # for the assigned traveler. The TAC# will be used to track the hours worked and for fee-related accounting, and approval of a TAC# automatically initiates a "Blue Sheet" from Centralized Work Planning. All fee waivers must be processed before the TAC# is requested.

TRIM (Time, Resource, and Inventory Management) is used to request a TAC#; detailed instructions are in the "TRIM Users Guide" available through the Organizational Effectiveness Branch (POEB) website at <http://nrr10.nrc.gov/poeb/index.html>.

The TAC requestor must select a PA or Planned Activity and Activity Type codes. The NRC's codes are listed in the RITS user's guides, which may be viewed at <http://nrr10.nrc.gov/poeb/index.html>. For a TSTF traveler, use PA code 111106 "IMPROVED STANDARD TECH SPECS PRG DEV." The usual fee-billable activity type is "RO." There is a similar non-fee billable entry for use if a waiver was granted. Then, from the "Activity Type List" select the "RO" code. Under the "Template Title" field, select "Rx Lic - improved standard tech spec program development - other regulatory tasks - fee billable" (or non fee billable if appropriate). Clicking "Template Description" in the yellow box will confirm your choices by describing the template.

When entering the description of the TAC, the "Title" field is entered as the letters and numbers (e.g., TSTF-123) with the "-" in the name, then the abbreviation "Rev." for the revision, then quotes and the exact title of the TSTF traveler as shown in the cover letter of the submittal. If the TAC # is for a risk-management technical specification (RMTS), also called a risk-informed technical specification (RITS), the phrases RMTS and RITS should be appended to the title. Please follow this format. Make sure to have the ADAMs ML# too. Enter the document's date for submission date. Use 18 months from the submission date for the due date, unless the TSTF and the NRC have agreed to a shorter schedule.

4.2.7 Process Traveler through Work Planning Center



ITSB has responsibility for project management of TSTF Travelers. After the fee determination process, if any, is complete, and the acceptance review is done, a work plan is needed. LIC-101 provides the general guidance for work planning (see LIC-101, Appendix B, Section 2.4, "Develop a Work Plan"). The work plan is developed by the ITSB lead reviewer with input from involved technical branches.

A Work Planning and Characterization Forms Blue sheet is used to initiate the process. When the TAC # is generated, the WPC will automatically generate a Blue sheet which is then delivered to the TAC owner.

The front of the Blue Sheet will list four major areas already customized for the TSTF traveler: Application Information, Review Assistance Requested, Managers Plan and Schedule, and NRR Review Branch Plan and Schedule.

The Application Information section will be automatically filled out with the information from the TAC request.

The Review Assistance Requested section will be completed by the TAC manager (the TAC manager is the same person as the ITSB lead reviewer for the traveler). The Blue sheet will have fields ready for "Requested Milestone Target Dates" for:

1. Acceptance Review to ITSB Lead,
2. RAI sent to ITSB Lead,
3. Draft Package input sent to ITSB Lead, and
4. Resolve Draft Package Comments.

The goal is to have the traveler review completed in less than 18 months. The desire is to complete it sooner whenever possible. The dates the ITSB lead reviewer selects will depend on the complexity of the traveler.

4.2.8 Complete and Return the Green Sheet to ITSB Lead Reviewer

Following the completion and return of the Blue Sheet, the WPC generates and distributes Green Sheets to all the branches. The branches should indicate that review or concurrence is appropriate. Estimates of hours and schedules should be included. Following the return of the Green Sheets, the ITSB lead reviewer should assess the responses, ensure that the process has resulted in a work plan that meets desired goals, includes reasonable estimates given complexity/risk-significance of application and availability of precedents, and includes all appropriate technical areas. Questions regarding responses to the green forms should be directed to the appropriate branches and the WPC (through divisional representatives).

Upon receipt of the Green Sheet, the NRR review branch technical expert should determine the scope of review and level of effort, start date, and milestone dates. The significance of the dates is discussed in subsections 4.2.8.1 - 4.2.8.4 below.

4.2.8.1 Green Sheet Date: Acceptance Review to ITSB Lead Reviewer

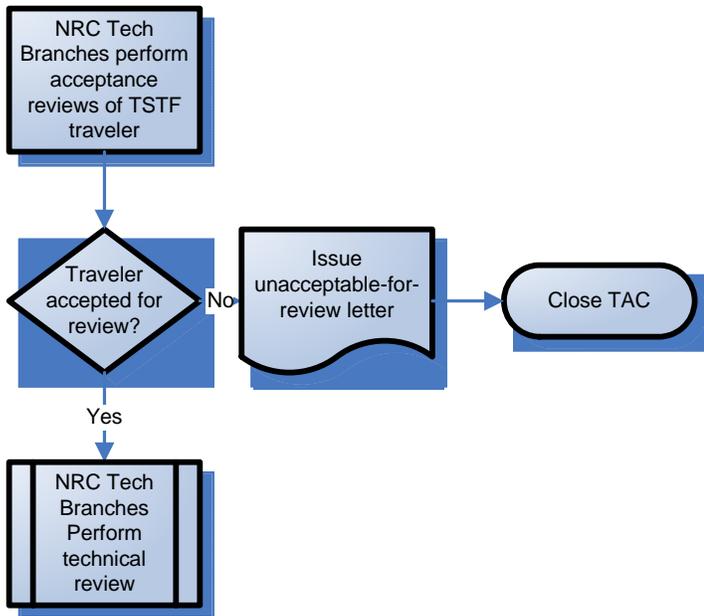
The most important near-term milestone date is "Acceptance Review to ITSB Lead." Accepting a traveler for review does not mean the NRC agrees with the traveler, nor that the NRC will approve the traveler; it only means that there is sufficient information in the traveler for the NRC to perform a review.

Each NRR review branch should refrain from charging significant hours until the ITSB lead reviewer has received all the Green Sheets back from all the NRR branches and verified that none have stated that the traveler is unacceptable for review.

Note the time requirements for the acceptance review do not commence until the fee exemption request has been resolved, or the submitting organization has agreed to pay the fee, in case the fee exemption request is denied.

4.2.8.2 Green Sheet Date: RAI Sent to ITSB Lead

This is date that the involved technical branches will submit RAIs to the ITSB lead reviewer. The ITSB lead reviewer will forward the RAIs to the TSTF.



RAIs will take from 60-90 days from the time they are sent until the answers are in ADAMS. If RAIs are scheduled early in the process, there is less chance of a last-minute issue impacting the review schedule.

4.2.8.3 Green Sheet Date: Draft Package Input Sent to ITSB Lead Reviewer

This date is the milestone for transmitting the technical branch's inputs to the ITSB lead reviewer. The technical branch is expected to provide all applicable input to the package.

4.2.8.4 Green Sheet Date: Resolve Draft Package Comments

This date is the due date to resolve all public comments. The technical branches should be certain to allocate resources to address relevant comments during the two weeks after the close of the public comment period.

4.2.9 Acceptance Review

The purpose of the acceptance review is to screen out submittals that are insufficient based on the provided information. In other words, a cursory review reveals that additional information is needed before an in-depth review can begin (e.g., supporting documents were not provided, relevant commonly-known issues were not discussed). The acceptance review should not be used to screen out submittals that seek to overturn past policy and past precedent, so long as the submittal is clear that it seeks to overturn the previous policy. It would be appropriate to reject a submittal that fails to cite the policy or precedence it's trying to overturn because the NRC needs the information to assess the impact of reversing the policy.

The acceptance review is performed by both the ITSB lead reviewer and the technical branches. The ITSB lead reviewer's responsibility is to ensure that the TSTF Traveler meets the criteria for acceptance in the TSTF program provided in Section 4.1.1. The technical branch's responsibility is to ensure the TSTF Traveler is technically complete enough to start a review. If the staff decides to reject the TSTF Traveler for technical reasons, the rejecting technical branch will provide an explanation in a memo from the branch chief of the technical branch to the branch chief of the ITSB to provide a basis for the technical branch's rejection.

Because the TSTF's process includes peer-review of the proposed TSTF Traveler, the NRC does not anticipate a substantial acceptance review prior to commencing work. However, the proposed change to the STS must, at a minimum, meet the requirements of 10 CFR 50.36, just like it was an LAR for a plant's TS. The ITSB will also review proposed bases-only changes, even though a bases-only change would not always be required to be submitted to the NRC for approval. The bases-only changes are acceptable for review because of the improved consistency and gained efficiency for the licensees.

Generally, the TSTF Traveler should meet the requirements for an amendment application, including 10 CFR 50.90, 50.91, and 50.92. Consult the acceptance review section of LIC-101 for guidance. Note, however, that a TSTF Traveler does not have to meet "oath or affirmation" requirements of 10 CFR 50.30(b), because the Traveler is not an application for a license amendment. When a licensee submits a LAR to adopt a TSTF or convert to the STS, the licensee will be subject to the oath or affirmation requirements.

There may be proprietary information in some underlying Topical Reports (TRs) used to support a TSTF Traveler. This is acceptable, and the review of the TR should have addressed the information withholding issue separate from the TSTF Traveler. The TSTF Traveler reviewers must take appropriate steps to prevent inadvertent release of the sensitive information, and these steps should be highlighted during the acceptance review.

A rejection during the acceptance review phase must be formal and documented in ADAMS as an Official Agency Record (OAR). See Enclosure 2 for a sample not-acceptable-for-review letter. Additionally, the rejecting reviewer's branch will be encouraged to participate in a conference call with the TSTF to explain the basis for the rejection prior to sending the formal rejection to the TSTF.

4.2.10 Milestone/Acceptance/Work Plan Review Conference Call

Within 30 days of receipt of the technical branches' acceptance reviews, the ITSB lead reviewer should hold a telephone conference call with TSTF to discuss the review work plan or explain the reasons for not accepting the TSTF for review. During the call, obtain a mutual agreement on the review schedule milestones and estimated review costs. All the information needed has already been provided on the Green Sheets returned by the involved branches, so the ITSB lead reviewer may make the call without other branches present.

The conference call should result in an agreed-upon schedule for the review. This will aid the NRC and the industry in planning. The schedule might not match the desired time stated in the TSTF's cover letter, and the industry might subsequently request a change in schedule. During the call, inform the industry of the reasons for the selected schedule, and be receptive to the industry's desire to change the schedule. However, do not change the schedule during the call because the other involved branches are not present.

The call should be followed up with a letter from ITSB to TSTF documenting the review milestones or the reasons for rejection, if applicable. The should be done within 45 working days of receipt of the TSTF Traveler (see ML062790178, "Acceptance for Review and Establishment of Milestone Schedule for TSTF Traveler 495, Revision 0, "Bases Change to Address GE Part 21 SC05-03" for a sample acceptance letter).

The review schedule and milestones are public. If it becomes necessary to update the schedule milestones, the staff and the TSTF should develop a new timetable at a later date (perhaps during periodic public meetings on TSTF status). The TSTF typically assigns a "champion" for each traveler. The ITSB lead reviewer should discuss significant changes to the schedule with the "champion."

The ITSB lead reviewer has the duty to track hours charged to the review of the TSTF. If it appears the hours will significantly exceed the estimates, the ITSB lead reviewer should

discuss this with the assigned branches and should notify the TSTF to provide the opportunity to request a cessation of work on the traveler, rather than being surprised at a higher-than-expected review fee.

4.2.11 Technical Review Commences: RAIs Provided by Technical Branches to ITSB

One of the first milestones during the review is development of RAIs by the technical branches. In LIC-101, Rev. 3, the following guidance on RAIs is provided:

Requests for additional information (RAIs) serve the purpose of enabling the staff to obtain all relevant information needed to make a decision on a licensing action request that is fully informed, technically correct, and legally defensible. RAIs are necessary when the information was not included in the initial submittal, is not contained in any other docketed correspondence, or cannot reasonably be inferred from the information available to the staff. RAIs should be directly related to the applicable requirements related to the amendment application, and consistent with the applicable codes, standards, regulatory guides, and/or the applicable Standard Review Plan sections. RAIs should not be used as general information requests or as a means to encourage commitments from licensees. This guidance can be utilized for other licensing actions such as exemption and relief requests.

The technical branches will formally transmit their RAIs to the ITSB by the agreed upon schedule. The technical branch may provide their RAIs to the ITSB lead reviewer at any time. The ITSB should review the RAIs within five working days and contact the technical branch if there are any concerns. Rather than contacting the TSTF directly with RAIs, the review branches should involve the appropriate ITSB lead reviewer or ITSB TSTF program manager.

Consult Section 4.3 of Appendix B to LIC 101 for more information regarding the technical contents of RAIs, how to transmit them from branch to branch, and recordkeeping.

4.2.12 ITSB Provides RAIs to TSTF

In accordance with the schedule milestone, and after the RAIs have been received by ITSB, the ITSB lead reviewer will provide those RAIs to the TSTF. The RAIs might be transmitted via mail, or might be electronic (i.e. on a website or through e-mail). However, they are to be formal RAIs and are to be approved by the ITSB branch chief. The NRC staff is responsible for assuring that the questions and answers become agency records and are properly stored in ADAMS. Consideration must be given to public release of potentially sensitive information, safeguards information, pre-decisional information, etc..

There is a time limit on the response for RAIs, and the review of a TSTF Traveler will be closed if the industry's responses are untimely. The date in ADAMS of the RAIs will be used to track the response time for response from industry. The exact response time is subject to negotiation, but will typically be between 60 and 90 days. The TSTF may request an extension in writing by formally submitting the request to the NRC.

4.2.13 TSTF Provides Additional Information

The responses to RAIs should be sent to the NRC in accordance with 10 CFR 50.4 and described in Section 4.2.2 of this OI. The response to the RAIs does not have to be under oath or affirmation, since there is no Part 50 license amendment directly involved.

The ITSB TSTF Program Manager should assure that the ITSB lead reviewer receives the responses and forwards them to the appropriate reviewers.

If the TSTF does not respond to the RAIs in a timely manner, typically 90 days, then the review of the traveler will cease and the TAC # will be closed.

4.2.14 Technical Branch Transmits SE or Denial to ITSB Lead Reviewer

The reviewing technical branches should follow the guidance in LIC-101. They will create the SE or input and provide the ITSB lead reviewer with the product in accordance with the milestone dates. In addition, the technical branch should also propose a review plan, model application, including appropriate data and information required for future submittals, and licensee commitments and clearly identify the conditions and limitations the staff has placed on the use of the approved TSTF in the body of the SE, including plant-specific items that a licensee referencing the approved TSTF will need to submit.

If resolution cannot be achieved or the staff otherwise plans to deny an amendment application, the TSTF should be informed by telephone prior to forwarding the official denial letter. The TSTF should be given a reasonable time to decide whether to accept the denial, withdraw the application, or request a meeting with NRR staff and management.

The transmittal of the SE input to the ITSB lead reviewer should be in accordance with LIC-101.

4.2.15 ITSB Lead Reviewer Prepares Draft CLIP Package

The ITSB lead reviewer has the responsibility preparing and assembling the draft CLIP Package in a form suitable for publication in the FR for comments. The for-comment package consists of:

- * A summary description of the comment notice;
- * A model application;
- * A proposed NSHC determination;
- * A model SE;

LIC-101 describes how to make an SE and a proposed NSHC determination. Regarding a model application, examples may be viewed at

<http://www.nrc.gov/reactors/operating/licensing/techspecs/changes-issued-for-adoption.html>. Review the most-recent examples for current guidance.

The concurrences on the CLIP package are in accordance with the Work Control green sheets. In addition, the Office of General Counsel (OGC) concurs in notices that are to be published in the Federal Register.

To assure the NRC creates effective, understandable documents for publication in the FR, the staff involved is encouraged to review the guidance at <http://www.archives.gov/federal-register/write/resources.html>.

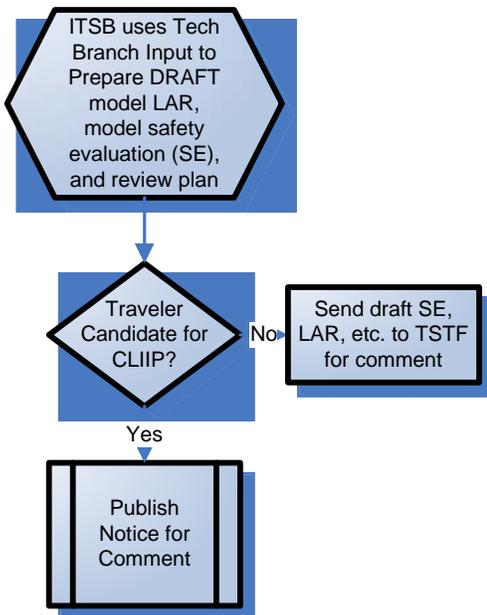
In addition, the ITSB lead reviewer will prepare and obtain concurrence on a review plan, which describes the role of the involved technical branch in the review of the TSTF Traveler. The review plan is internal -- it is not part of the package published for comment and does not require OGC's concurrence. A sample review plan may be viewed at ML060650260.

4.2.16 Publish Draft TSTF Package in Federal Register or Submit to TSTF

The normal process is to publish the package as a notice-for-comment, with a 30-day comment period, in the biweekly collection of notices in the FR. There may be times when a package is sent directly to the TSTF for comment (*i.e.* it is not CLIP), but these should be handled on a case-by-case basis. In general the Federal Register should be used for comments. This maximizes stakeholder involvement and the openness of the NRC.

The package is completed by the ITSB lead reviewer and given to the branch secretary for declaration as an OAR. The secretary then forwards the package to the Rules and Directives Branch (ADM) for transmittal to the FR. The Rules and Directives Branch (RDB) is responsible for ensuring that the NRC documents submitted for publication meet the basic publication requirements of the Office of the Federal Register.

4.2.17 Receive Comments

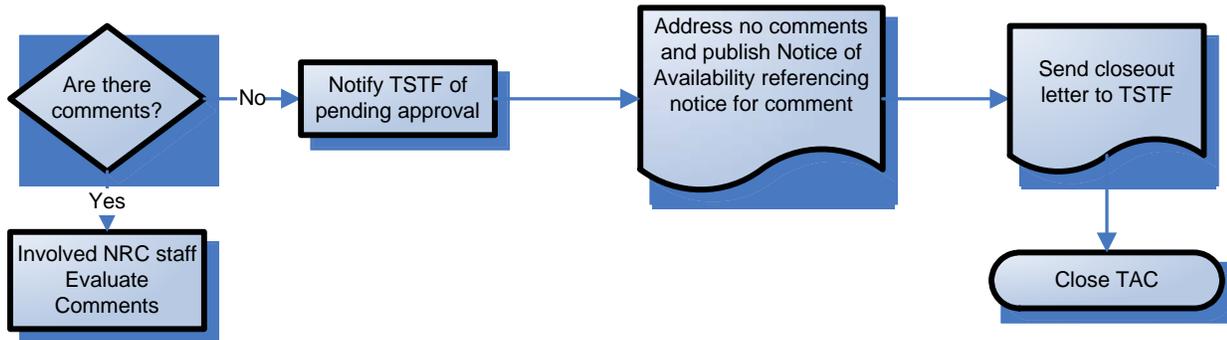


The Rules and Directives Branch is responsible for docketing comments received on general notice documents published by offices under the EDO's overview. This does not imply that these documents are informal rules. Comments sent through EIE or to the CLIP e-mail must be forwarded to the Rules and Directives Branch for docketing. The CLIP@NRC.GOV e-mail is automatically forwarded to the Rules and Directives Branch, and to the ITSB TSTF Program Manager. The program manager should copy the comments to the appropriate ITSB lead reviewer.

It is possible that comments were provided via e-mails, phone calls, and face-to-face meetings. The ITSB lead reviewer should assure that such less-formal comments are captured into ADAMS for subsequent disposition. One way to do this is by e-mail the comments to CLIP@NRC.GOV.

4.2.18 Provide Resolution to Comments to ITSB Lead Reviewer

The ITSB lead reviewer will review the comments and determine if any need addressing by the involved technical branch. If so, the technical branch should be requested to address the comment within two weeks. Brief responses from the technical branch may be informal (e-mail, voicemail, etc.), however more complex responses should be in a formal branch-to-branch memo.



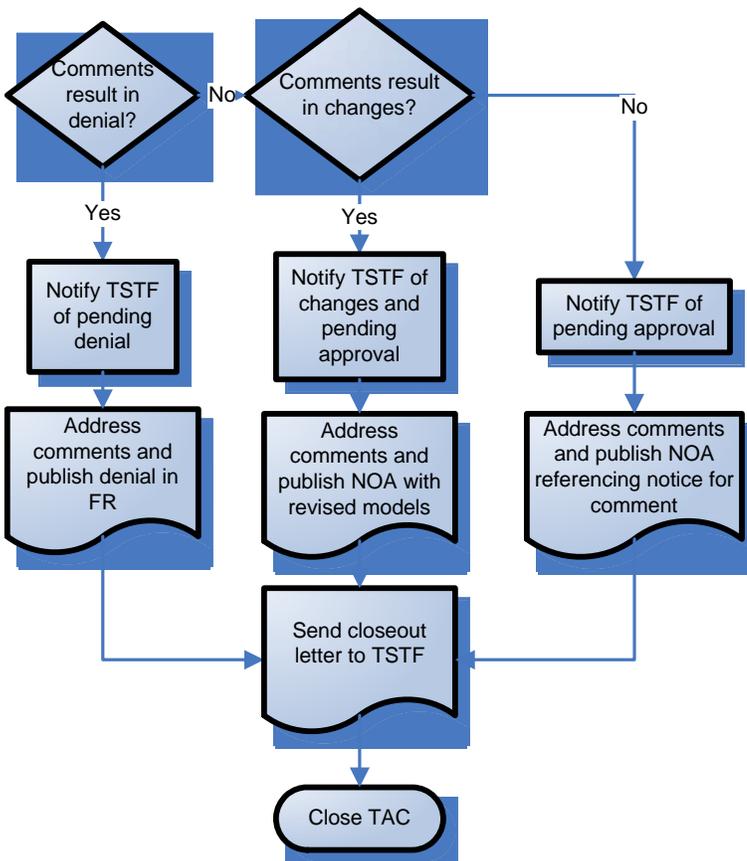
4.2.19 Address Comments and Prepare Final Package for FR

The ITSB lead reviewer has the duty to address the comments in the final Notice for

Availability or denial. With the input from the technical branch described above, the ITSB lead reviewer will review the comments and decide if the public comments warrant reconsideration or rejection of the proposed TSTF Traveler change and associated SE and proposed NSHC determination. The decision should be made within 14 days.

If the TSTF Traveler is not rejected, then the ITSB lead reviewer will amend the description of the proposed change, PSHCD, and SE, as appropriate to resolve the public comments. The revisions should be incorporated within 20 working days.

If resolution of the public comments requires a revision to the TSTF Traveler, such as to the STS changes (specifications or bases), a revision to the justification, or addition of new conditions or restrictions, the ITSB lead reviewer should notify the TSTF that such a revision is necessary. The TSTF will be



requested to provide a revision to the TSTF Traveler incorporating the needed changes. The final proposed change, PSHCD, and SE will reference the revised TSTF Traveler.

ITSB lead reviewer will issue the final package for the TSTF Traveler within four weeks after end of the comment period. The final package must summarize and address the comments received, and document the staff's disposition of the public comments.

The ITSB lead reviewer will prepare a letter approving the TSTF Traveler for referencing in licensing actions for signature of the Branch Chief with concurrence based on the original centralized work planning requests, or based on which groups provided inputs, plus OGC. The final package letter should follow the guidance in Enclosure 4.

4.2.20 Publish NOA and Update ITSB Website

Using the FR and the NRC's website, the ITSB lead reviewer will announce the availability of the accepted TSTF Traveler changes, associated proposed NSHC determination, and the SE. The announcement will include a recommended schedule for the submittal of amendment requests, and it will highlight the required verifications, conditions, commitments, etc., associated with the LAR and review plan.

4.2.21 TAC Management: When a TSTF Traveler TAC May Be Closed

The ITSB lead reviewers are responsible for closing the TAC associated with the review of the traveler when appropriate.

A TSTF TAC will be closed if:

- 1) The TSTF is approved, disapproved, or withdrawn, and the documentation is entered into ADAMS; or
- 2) A revision to a TSTF Traveler is submitted that is so different from the previous revision that it will be reviewed *de novo* (meaning the findings of the review of the previous revision are ignored); or
- 3) An RAI was submitted and no information was received within ninety (90) days from the date of the request, or within such other time as may be specified. See Enclosure 5 (ML060890076) for a sample letter.

All closeout reasons must be discussed with the Branch Chief and documented in ADAMS. The ADAMS accession number is also posted on the ITSB website.

Remember: The TAC #s are very clearly the Owners Group's business. They are billed for the work, and respectively deserve to be informed immediately of changes in activity.

4.3 Other Issues

4.3.1 Sequential Review of LAR and T-Travelers

The Owners Groups sometimes develop and approve a TSTF Traveler, but decide that it is not cost-beneficial to submit the traveler to the NRC for review and approval. Instead, the travelers are made available for use in plant specific LARs and posted on the owners

groups' website for use as templates for plant-specific license amendments. The travelers receive a "T" designation to show that they are "templates" (e.g., TSTF-445-T). Upon approval of the T-Traveler, the TSTF will change the designation to an A-Traveler (e.g., TSTF-445-A). A licensee will submit a LAR using the template, and the NRC will first review the plant-specific LAR, then the generic traveler.

If a licensee decides to submit a T-Traveler-based LAR to the NRC, the plant is said to be a "lead plant" for the traveler. After the plant-specific licensing action, the NRC will consider the generic applicability of the T-Traveler. The evaluation of the LAR might warrant approval of the Traveler for generic adoption, but the approval or denial of the associated LAR is not controlling over approval or denial of the T-Traveler. The disposition of the T-Traveler needs to address any conditions, limitations, or issues associated with the plant-specific LAR.

The NRC reviewers are cautioned about accepting a T-Traveler for review and should carefully consider the following:

- * If the OG did not believe that the proposed TSTF traveler was sufficiently cost-beneficial to justify NRC review fees, then the NRC should carefully consider committing its resources.
- * In addition, the T-Traveler process is more expensive and time consuming for the lead plant, and will delay their LAR.
- * The T-Traveler process will also drain NRC resources because the staff must generate two SE's; a plant specific SE for the LAR and a generic SE for the TSTF traveler; depending on the nature of the LAR, a generic or model SE based on a plant specific LAR could have unintended consequences.

The licensees may always pursue an LAR using a T-Traveler without having the ITSB approve the T-traveler as an A-traveler. The ITSB staff should encourage the TSTF to submit regular travelers to update the STS rather than waiting for a T-traveler. If the STS need to be updated, the TSTF Traveler should be submitted to the NRC staff for review.

4.3.2 Simultaneous Parallel Review of TSTF Travelers and LARs

During the NRC's review of a TSTF Traveler, licensees might submit plant-specific LARs that reference the same traveler which was submitted by the TSTF but has not been approved or denied by the NRC. This is not the same as the "Lead Plant" or "T-Traveler" process, where the generic applicability is considered after the plant-specific, but is instead a parallel review of the TSTF Traveler and a plant-specific LAR.

The NRC might request a licensee to refrain from submitting any plant-specific LAR that requests a TSTF Traveler that is already under review, or might reject a submitted LAR as premature until the TSTF Traveler review is done. The staff anticipates that it is most efficient for the licensee to wait until the final disposition of the generic TSTF Traveler (i.e. a notice of availability or a denial) before the licensee submits a LAR.

If a parallel review is requested, such a double-review raises efficiency and workload questions. For instance, which TAC # is used? Does the work get charged to the owner's

group or to the licensee? What is the review schedule? How do the Green sheets and Blue sheets from CWP direct work and due dates?

The rule-of-thumb is the plant-specific LAR has priority in both scheduling and workload. Plant-specific LARs typically have a one-year completion time, whereas a TSTF Traveler have an 18-month goal. If the NRC accepts a plant-specific for review in parallel with a TSTF Traveler, the NRC should work on the plant-specific LAR under the LAR's TAC #, before working on the TSTF Traveler under the TSTF's TAC # and incorporate the work product from the LAR into the traveler's final disposition.

The work and billing plan for the LAR and traveler will have to be worked out on a case-by-case basis. The plant's PM and ITSB need to coordinate with the TSTF and with the licensee to assure the most efficient and fair billing.

5. RESPONSIBILITIES AND AUTHORITIES

5.1 ITSB TSTF Traveler Program Manager

The ITSB TSTF Traveler Program Manager has the principal responsibility within the NRC for the administration of the TSTF reviews. The person is assigned by the ITSB Branch Chief. The program manager:

- * Is the contact between the TSTF and the NRC for administrative issues;
- * Receives copies of incoming TSTF correspondence
- * Receives copies of incoming public comments
- * Distributes documents and comments to technical branch and ITSB Leads
- * Monitors TSTF review schedule
- * Assists ITSB staff and other NRC staff with the administrative issues

5.2 ITSB Lead Reviewer

The ITSB lead reviewer has the principal responsibility within the NRC for processing the TSTF Traveler. As the point of contact, the ITSB lead reviewer ensures that there is good communication between the staff and the TSTF.

The ITSB lead reviewer is responsible for:

- * arranging and conducting the pre-submittal meeting and including the OCFO in any discussion of fee exemptions
- * developing the work plan
- * obtain a TAC#
- * writing the acceptance review letter
- * writing the proprietary determination letter
- * issue RAIs to applicant
- * issue draft SE to applicant
- * issue final SE to applicant
- * create model LAR
- * obtain concurrences from technical branches involved in SE on model LAR and review plan
- * respond to public comments for CLIIP
- * respond to TSTF comments for non-CLIIP

5.3 Technical Branch Chiefs

The branch chiefs ensure that the staff follows office instructions. The branch chiefs are responsible for:

- * Signing major correspondence including
- * - acceptance letters
- * - rejection letters
- * - SEs
- * - review plans

5.4 Technical Reviewers

The technical reviewers are responsible for:

- * Using the CWP Green Sheets,
- * Maintaining TRIM,
- * Providing RAls in accordance with the schedule,
- * Providing SE input in accordance with the schedule
- * Participating meetings
- * Providing input to the work plan
- * Performing technical acceptance and proprietary reviews
- * Providing resolution to the applicant's comments on the draft SE

5.5 Office of General Counsel

The Office of General Counsel directs matters of law and legal policy, providing opinions, advice, and assistance to the agency. Specifically, the office provides no legal objection, if applicable, on notices and other documents that are to be published in the Federal Register.

5.6 Rules and Directives Branch

The Rules and Directives Branch is responsible for ensuring that the NRC documents submitted for publication meet the basic publication requirements of the Office of the Federal Register.

5.6 Responsible Managers

The ITSB Branch Chief has overall responsibility for the TSTF process. The Associate Director ensures the TSTF process meets the performance measures defined in the NRR Operating Plan.

6. PERFORMANCE MEASURES

The performance measures for the TSTF program are contained in the NRR Operating Plan.

7. PRIMARY CONTACTS

Trent Wertz
Technical Specifications Branch
(301) 415-1568

Ross Telson
Technical Specifications Branch
(301) 415-2256

8. RESPONSIBLE ORGANIZATON

NRR/ADRO/DIRS/ITSB

9. EFFECTIVE DATE

March 26, 2007

Enclosures:

1. Model Letter Accepting TSTF Traveler for Review
2. Model Rejection Letter
3. Model Draft Letter
4. Model Final Letter (No CLIIP)
5. Appendix A: Change History

Model Letter Accepting TSTF Traveler for Review

Technical Specifications Task Force
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: ACCEPTANCE FOR REVIEW OF [TSTF] (TAC NO.)

Dear Mr. :

By letter dated [date of incoming letter], Technical Specifications Task Force (TSTF) submitted for NRC staff review TSTF Traveler [number, revision and title of TSTF]. The NRC staff has performed an acceptance review of the [TSTF number]. We have found that the material presented is sufficient to begin our comprehensive review. The staff expects to issue a request for additional information by [date] and issue its draft safety evaluation by [date] and estimates that the review will require approximately [number of staff hours] staff hours including project management time, [and the estimated contractor cost, if applicable and available]. The review schedule milestones and estimated review costs were discussed and agreed upon in a telephone conference between [you or name of individual] and the NRC staff on [date].

[Use this second paragraph if the TSTF Traveler is fee billable]. Section 170.21 of Title 10 of the Code of Federal Regulations requires that TSTF Travelers are subject to fees based on the full cost of the review. You did not request a fee exemption; therefore, staff hours and the contractor cost if applicable will be billed as requested to the [Owners Group name].

[Use this second paragraph if the TSTF Traveler fee is waived]. By letter dated [date] (ADAMS Accession No. [ML]), the fee branch has provided an exemption in accordance with Section 170.11 of Title 10 of the Code of Federal Regulations. Accordingly, no fees will be charged for the review of this TSTF Traveler.

[Use this second paragraph if fee waiver was denied and the applicant still wants the TSTF Traveler reviewed]. In accordance with the letter dated [date] (ADAMS Accession No. [ML]), the Office of Chief Financial Officer denied your fee waiver request, but in the letter dated [date] (ADAMS Accession No. [ML]) you requested a fee-billable review. Section 170.21 of Title 10 of the Code of Federal Regulations requires that TSTF Travelers are subject to fees based on the full cost of the review.

Sincerely,

 , Chief
Technical Specifications Branch

Project No.

cc: See next page

Concurrence:

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|-----------|---------|--|--|--|
| ITSB Lead | ITSB/BC | | | |
|-----------|---------|--|--|--|

Enclosure 1

Model Rejection Letter

Technical Specifications Task Force
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: REQUEST FOR THE REVIEW OF **TSTF [#, Revision and Title]** (TAC
NO.

[])

On **[Date]**, the TSTF Group submitted **[TSTF #, Revision and Title]** to the staff for review.

As we notified you on **[Date]**, we have completed our acceptance review of your application and all of the supporting information in accordance with the TSTF and 10 CFR Part 50 criteria and have concluded that your TSTF Traveler is not acceptable for review for the reasons discussed below.

[DESCRIBE HERE OTHER REASONS FOR REJECTING THE TSTF Traveler].

Therefore, your request for the review of **[TSTF #]** is denied.

Sincerely,

Associate Director
Office of Nuclear Reactor Regulation

cc: See next page

Concurrence:

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| Lead Reviewer | ITSB | TS/BC | | |
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Enclosure 2

Model Draft SE Cover Letter and SE Contents

Technical Specifications Task Force
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: DRAFT SAFETY EVALUATION FOR TSTF **[#, Revision and Title]**(TAC NO.)

On **[DATE]**, the TSTF submitted **[TSTF #, Revision and Title]** to the staff for review. Enclosed for review and comment is a copy of the staff's draft safety evaluation (SE) for the TSTF Traveler.

[Use the following paragraph if proprietary material is involved. Remember to add "No DPC for 10 working days" next to PUBLIC on distribution.]

Pursuant to 10 CFR 2.390, we have determined that the enclosed draft SE does not contain proprietary information. However, we will delay placing the draft SE in the public document room for a period of ten working days from the date of this letter to provide you with the opportunity to comment on the proprietary aspects. If you believe that any information in the enclosure is proprietary, please identify such information line-by-line and define the basis pursuant to the criteria of 10 CFR 2.390. After ten working days, the draft SE will be made publicly available, and an additional twenty working days are provided to you to comment on any factual errors or clarity concerns contained in the SE. The final SE will be issued after making any necessary changes and will be made publicly available. The staff's disposition of your comments on the draft SE will be discussed in the final SE.

[Use this paragraph only if the TSTF Traveler is non-proprietary]

Thirty working days are provided to you to comment on any factual errors or clarity concerns contained in the SE. The final SE will be issued after making any necessary changes and will be made publicly available. The staff's disposition of your comments on the draft SE will be discussed in the final SE.

To facilitate the staff's review of your comments, please provide a marked-up copy of the draft SE showing proposed changes and provide a summary table of the proposed changes.

If you have any questions, please contact **[NAME OF THE LEAD]** at **[TELEPHONE NO.]**.

Sincerely,

Chief, Technical Specifications Branch
Office of Nuclear Reactor Regulation

Enclosure: Safety Evaluation
cc w/encl: See next page
Concurrence:

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|---------------|------|-----------------------|--|--|
| Lead Reviewer | ITSB | TS/SC* (*SE input) | | |
|---------------|------|-----------------------|--|--|

Enclosure 3

DRAFT SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR
REGULATION

TSTF [**NUMBER**], Revision [**NUMBER**]

"[**TITLE**]"

- 1.0 INTRODUCTION AND BACKGROUND
- 2.0 REGULATORY EVALUATION
- 3.0 TECHNICAL EVALUATION
- 4.0 LIMITATIONS AND CONDITIONS (If needed)
- 5.0 CONCLUSION

Model Final Non-CLIP SE Letter

Technical Specifications Task Force
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: FINAL SAFETY EVALUATION FOR TSTF [**TSTF Number, Revision and Title**]
(TAC NO.)

On [**date**], the Technical Specifications Task Force submitted TSTF [**number, revision and title**] to the staff. On [**date**], an NRC draft safety evaluation (SE) regarding our approval of TSTF [**number**] was provided for your review and comments. By letter dated [**Date**], [**the TSTF or name of owners group**] commented on the draft SE. The staff's disposition of those comments on the draft SE are discussed in the Enclosure to the final SE enclosed with this letter.

The staff has found that TSTF [**number**] is acceptable for referencing in licensing applications for [**vendor type**] designed [**pressurized or boiling**] water reactors to the extent specified and under the limitations delineated in the TSTF and in the enclosed SE. The SE defines the basis for acceptance of the TSTF.

Our acceptance applies only to material provided in the subject TSTF. We do not intend to repeat our review of the acceptable material described in the TSTF. When the TSTF appears as a reference in license applications, our review will ensure that the material presented applies to the specific plant involved. License amendment requests that deviate from this TSTF will be subject to a plant-specific review in accordance with applicable review standards.

If future changes to the NRC's regulatory requirements affect the acceptability of this TSTF, the Technical Specifications Task Force and/or licensees referencing it will be expected to revise the TSTF appropriately, or justify its continued applicability for subsequent referencing.

Sincerely,
[Signature block]
Chief, Technical Specifications Branch
Office of Nuclear Reactor Regulation

Enclosure: Safety Evaluation

cc w/encl: See next page

Concurrence:

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|---------------|------|--|--|--|
| Lead Reviewer | ITSB | TS/SC* (*if technical changes made to SE) | | |
|---------------|------|--|--|--|

