

February 16, 2007

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

FROM: */RA/*
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SUBJECT: SUMMARY OF JANUARY 18, 2007, CATEGORY 2 MEETING WITH
NUCLEAR ENERGY INSTITUTE (NEI), INDUSTRY OWNERS
GROUPS AND THE PUBLIC TO DISCUSS ISSUES RELATED TO
"RISK INFORMED TECHNICAL SPECIFICATIONS TASK FORCE
(RITSTF)" INITIATIVES

On January 18, 2007, a meeting was held between the U.S. Nuclear Regulatory Commission (NRC), representatives of the Nuclear Energy Institute (NEI), industry owners groups and the public to discuss status of Risk Informed Technical Specifications Task Force (RITSTF) items associated with Risk Informed Initiatives. The following is a brief summary of the meeting.

I. Initiative 1 "Technical Specifications Required Actions Preferred End States"

This initiative would permit, for some systems, entry into hot shutdown rather than cold shutdown to repair equipment.

Status on the Initiative and associated TSTFs :

- Westinghouse Topical Report on Initiative 1 is currently being reviewed by the NRC. A final set of requests for additional information (RAIs) are expected to be issued to Westinghouse by the end of May of 2007. The meeting participants noted that the two year review milestone for the Report which was submitted on September of 2005, may not be met.
- The NRC has commenced review of TSTF-431, Revision 1, "Changes in Technical Specifications End States." An Acceptance/Schedule letter is expected to be issued in February 2007.
- The NRC's review of plant specific adoptions of TSTF-423, "Risk Informed Modification to Selected Required Action End States for BWR Plants" has noted certain differences between Safety Evaluation for Topical Report

NEDC-32988-A, "Technical Justification to Support Risk-Informed Modification to Selected Required Action End States for BWR Plants," Revision 2, and Implementation Guidance (IG) regarding requirements for secondary containment and Standby Gas Treatment (SGT) system when primary containment is inoperable, and primary containment operability when secondary containment is inoperable. The TSTF Owners Group agreed to the NRC's suggestion to revise applicable IG to remove the option of performing a plant-specific risk assessment instead of having the other systems available. The NRC is planning to have a meeting with the TSTF to resolve these differences and discuss a schedule on plant-specific applications on the adoption of the subject TSTFs.

II. **Initiative 4a, "Individual Risk Informed Completion Times (CT) Extensions"**

This initiative permits application of risk-informed technical basis for specific changes to Technical Specification Completion Times (CTs) per Regulatory Guide 1.177.

Status on the Initiative and associated TSTFs:

- The NRC's review of two topical reports, "Technical Justification to support risk-informed Completion Time Extensions for the Standby Gas Treatment (SGT) system and Main Control Room Environmental Control (MCREC) system for BWR Plants" (ADAMS Accession No. ML062120021) and "Technical Justification to support risk-informed modifications to selected technical specifications for conditions leading to exigent plant shutdown for BWR plants" (ADAMS Accession No. ML062120020) submitted by the BWR Owner Group (BWROG), determined that defense-in-depth philosophy and safety margins approach was inadequately addressed in the reports. Subsequent to this meeting, the NRC issued letters, (ADAMS Accession Nos. ML 070080185 and ML070080192) on January 24, 2007, informing the TSTF Owners Group on the NRC's decision of non-acceptance of the subject topical reports.

III. **Initiative 4b, "Risk Informed Completion Times with Configuration Risk Management Program or Maintenance Rule Backstop"**

This initiative would permit, contingent upon the results of a plant configuration risk assessment, temporary extension of the existing completion time within an LCO using a quantitative implementation of 50.65(a)(4).

Status on the Initiative and associated TSTFs:

- The NRC stated that a Safety Evaluation for the Implementation Guidance document NEI 06-09, is currently being prepared by the NRC.
- The NRC's Electrical Branch chief stated that since August 2003, it has been the NRC's practice to require the licensees to have an alternate AC source for extending Diesel Generator TS Completion Times. NEI raised a concern with the NRC on the technical basis for requiring an alternate AC source given the

high-quality PRA and other requirements for Initiative 4b. In response, the NRC stated that the practice is based on defense-in-depth, recognizing the high risk of loss of offsite power, and concurrent with Diesel-Generator maintenance. South Texas Project (STP) was concerned about how this will affect their Initiative 4b submittal schedule. The NRC will finalize a position on the issue in the near future.

- The San Onofre Nuclear Generating Stations (SONGS) representative stated that management is still considering whether SONGS will be another lead plant for this Initiative.
- The Fort Calhoun Power Station (FCS) representative informed the meeting that the lead plant amendment which they withdrew on September 8, 2006, will be resubmitted to the NRC in the first quarter of 2007. The NRC plans to visit FCS to review the plant's PRA and capability to adopt Initiative 4b.

IV. Initiative 5b, "Relocate Surveillance Test Intervals to Licensee Control"

This initiative permits SR frequencies to be determined through a TS program and relocates to a licensee-controlled TS program.

Status on the Initiative and associated TSTFs:

- TSTF-425, Revision 0, "Relocate Surveillance Test Intervals to Licensee Control" was submitted to the NRC on August 31, 2004 (ADAMS Accession No. ML052990318) addressing changes to the BWR Standard Technical Specifications (STS) NUREGs 1433 and 1434. A revision to TSTF-425 will be issued to address, (a) its applicability to the PWR STS NUREGs and, (b) the application to surveillances performed on Staggered Test Basis. Since this represented a change in the original scope of TSTF-425, the NRC informed the Industry that it has decided to close Technical Assignment Control (TAC) number MB2531 assigned for the TSTF and will restart work and assign a new TAC number when a revised TSTF is received. Subsequent to this meeting, a letter stating the NRC's position was issued on February 5, 2007, (ADAMS Accession No. ML070310092).
- The NRC informed the meeting that the Agency has received a letter of intent from Diablo Canyon Power Plant to be a pilot plant for Initiative 5b.
- The NRC staff intends to visit Limerick this coming Summer to assess their implementation of RMTS Initiative 5b.

V. Initiative 6, "Modify LCO 3.0.3 Actions and Completion Times"

This initiative would provide TS Conditions and Completion Times for some LCO's for system restoration to Operable Status prior to explicit entry into the LCO 3.0.3 shutdown track.

Status on the Initiative and associated TSTFs:

- TSTF-426, Revision 0, "Revise or Add actions to Preclude Entry into LCO 3.0.3" was submitted to the NRC on August 30, 2004 (ADAMS Accession No. ML052990318). Subsequently, upon accepting the TSTF for review, the NRC assigned TAC No. MC4438 to track work on the TSTF. On November 13, 2004, the NRC provided an RAI on the TSTF to which the TSTF responded on April 27, 2005. In August of 2005, NEI provided formal Implementation Guidance WCAP 16446-WP to the NRC for review. The NRC issued the Notice for Comment on July 20, 2006, to which the TSTF Group provided comments on August 21, 2006. It was agreed that, based on comments received, TSTF-426 needed to be revised to resolve discrepancies in the topical report safety evaluation and TSTF-426, Revision 0. Therefore, the NRC has decided to close TAC MC4438 and will reopen or assign a new TAC number when a revised TSTF is received, following full resolution of staff concerns related to the associated Topical Report WCAP 16446-WP. Subsequent to this meeting, a letter stating the NRC's position was issued on February 5, 2007, (ADAMS Accession No. ML070310092).
- The Industry representatives noted that there are plant-specific submittals that have referenced the Topical Report SE. The NRC recommended that those submittals be revised.

VI. Initiative 7, "Snubber/Hazard Barrier Unavailability"

This initiative permits a risk-informed delay time before entering LCO actions for inoperability due to loss of support function provided by equipment outside of technical specifications.

Status on the Initiative and associated TSTFs:

- The Industry is developing a white paper outlining the process and proposed scope of applying this initiative to other Structures, systems and components (SSCs). The PWROG is pursuing funding to pursue this initiative in 2007 and 2008.

VII. Initiative 8, "Remove/Relocate non-safety and non-risk significant systems from Technical Specifications"

Initiative 8a would review technical specifications to remove systems that were included solely because they were judged risk significant at one time and have now been shown by analysis not to be. Initiative 8b would make the scope of technical specifications depend only on risk significance.

Status on the Initiative and associated TSTFs:

- The Industry has developed an Initiative 8a submittal. The BWROG will consider in pursuing this initiative in May, 2007. The PWROG will begin work on

Initiative 8a in 2007/2008.

VIII. Public Participation Invited:

No comments received.

IX. Next Meeting:

A tentative date of June 7, 2007 was set for the next NRC-RITSTF meeting.

IX. Adjourn

Enclosures:

1. Attendees List
2. January 18, 2007 Public Meeting Agenda
3. Brian Mann's (EXCEL Services Corporation) e-mail, dated February 2, 2007, on Updated status on RITSTF and Risk Informed Initiatives

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VIII. Public Participation Invited:

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ADAMS ACCESSION NO: MLML070380050-pkg, ML070380048-memo, ML070470370-agenda; ML070470398 - Attendees List; ML070470423-Excel Services - E-mail

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