March 5, 2007

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

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

SUBJECT: SUMMARY OF FEBRUARY 6, 2007, CATEGORY 2 MEETING WITH THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) AND FIRSTENERGY NUCLEAR OPERATING CO. (FENOC) TO DISCUSS DEVELOPMENT OF THE ACCELERATED REVIEW PROCESS FOR TECHNICAL SPECIFICATION CONVERSIONS AND RELATED LICENSING ACTIONS.

On February 6, 2007, 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 development of the accelerated review process for technical specification (TS) conversions and related licensing actions. The accelerated review process is expected to guide the administration of the upcoming Davis-Besse conversion to improved TSs and related future industry licensing actions.

The meeting generally followed the agenda proposed in a January 24, 2007, Public Meeting Notice (ADAMS Accession No. ML070230284) as amended by the meeting participants. A number of documents were shared and discussed during the meeting. They are listed in enclosure 1 and available to the public in ADAMS Package Accession No. ML070520128.

Enclosure 1 contains the minutes of the meeting, enclosure 2 list all meeting attendees, and enclosure 3 provides address information for non-NRC attendees.

Enclosures:
As stated

CONTACT: Ros Telson, NRR/DIRS
(301) 415-2256
RDT@nrc.gov

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CONTACT: Ros Telson, NRR/DIRS
(301) 415-2256
RDT@nrc.gov

DISTRIBUTION: ITSB r/f RidsNrrDirs RidsNrrDirsItsb Enclosure 3 Address List

ADAMS ACCESSION NUMBERS: **ML070520133** - memorandum; **ML070520128** - package

| OFFICE | ITSB:DIRS | BC:ITSB:DIRS |
|---|---|---|
| NAME | RTelson | TKobetz |
| DATE | 3/5/2007 | 3/5/2007 |

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## Meeting Minutes

A meeting was held between the NRC and representatives of the Technical Specifications Task Force (TSTF) and the FENOC/Davis-Besse TS conversion coordinator was held on February 6, 2007, to discuss the development of the accelerated review process for technical specification (TS) conversions and related licensing actions, which is expected to guide the administration of the upcoming Davis-Besse conversion to improved TSs and related future industry licensing actions. The meeting followed the agenda proposed in a January 24, 2007, Public Meeting Notice (ADAMS Accession No. ML070230284) as amended by the meeting participants. The following is a brief summary of the meeting.

Morning Session: 09:00 - 11:30 AM

**I. ADMINISTRATIVE MATTERS**

A. Introductions
B. Agenda Review & Amendment
C. Other Administrative Issues

**II. REVIEW PAST IMPROVED TECHNICAL SPECIFICATION (TS) PILOT PROCESS** - See referenced handouts in ADAMS Package Accession No. ML070520128 (listed individually below).

A. NRC presented an overview of lessons learned in connection with the accelerated review process pilot, titled Accelerated STS Conversion (ADAMS Accession No. ML070510156).

B. EXCEL Services Corporation Presentation

1. Perceived benefit of pilot process to industry
2. Issues encountered from industry perspective
3. Approaches to address the issues

The TSTF provided the following documents:

a. Accelerated Review Process - ITS Lessons Learned (ADAMS ML070520143)
b. Improved Technical Specifications (ITS) Submittal - Accelerated Licensing Review Process (ADAMS ML070520151)
c. Accelerated ITS Licensing Process (Pilot) Schedule (ADAMS ML070520171)
d. ITS Conversion Process PowerPoint Presentation (ADAMS ML070520162)

## III. WORKING SESSION

A. Summarize Lessons Learned

1. Highlight Identified Successes - Participants discussed and generally agreed that the following accelerated review pilot successes were perceived:

   a. ITS Conversion process was streamlined
      (1) Time and effort were generally reduced for NRC and licensee staffs
      (2) Formal communications were consolidated and generally reduced
      (3) Use of electronic submittals in place of paper enhanced efficiency
      (4) Use of “Doc Tables” enhanced acceptance review and project Mgt.
      (5) Real-time exchange of information (e.g. Face-to-Face and Online Q&A) promoted effective communications and reduced or eliminated administrative delays of traditional RAI process
      (6) Disciplined scope-control is crucial to accelerated ITS conversion process

   b. Accelerated ITS conversion encouraged additional licensees to convert to ITS
      (1) A number of licensees, which would not consider conversion before the pilot, are now contemplating converting to ITS
      (2) A number of ITS conversion requests are currently anticipated following the Davis-Besse conversion

   c. Modified Traditional (Formal) RAI process effectively consolidated and documented real-time information exchange and was used, as needed, to address problem areas

   d. Process predictability improved

2. Highlight Identified Areas for Improvement

   a. Failure to control ITS conversion scope can be highly detrimental

   b. Enhanced controls are needed for Online Q&A process

      (1) Enhanced training and/or qualification of participants
      (2) Improved process guidance, oversight, and accountability
      (3) Possible implementation of online Q&A workflow controls
      (4) Maintenance of accountability controls for quality and timeliness
      (5) Timely identification, tracking, and resolution of issues as they develop
      (6) Clear definition and agreement regarding key terms such as “Beyond Scope Item (BSI)” and their impact on ITS conversion scope
      (7) Early identification of ITS conversion scope growth items and their potential impact on anticipated ITS conversion effort and duration
      (8) Responsive but not overly-burdensome checks-and-balances needed for ITS conversion and particularly the online Q&A process
      (9) Consistent, predictable, expectations and application of requirements for justifying ITS changes - particularly more-restrictive changes

B. Address differing perspectives on benefit vs challenges to requirements

   1. No major differences were identified though there was discussion regarding the establishment of an appropriately responsive system of checks-and-balances without resorting to more burdensome traditional RAI processes

C. Evaluate challenges that must be addressed in finalizing pilot (or new) process

   1. Explore interim solutions to challenges - This area was not covered in significant depth beyond that discussed under A. There was, however, discussion of proceeding with the Davis-Besse ITS conversion under a DRAFT procedure if it could not be finalized prior to the scheduled ITS conversion submittal.

   2. Identify long-term solutions to challenges - In addition to the anticipated development of formalized guidance, training, and qualification processes for ITS conversion participants, the eventual establishment of an NRC-controlled online Q&A process was discussed.

D. Evaluate alternative approaches to achieving benefits and satisfying requirements - No fundamentally different approaches were proposed. Current alternatives appear to be traditional licensing / RAI processes, the piloted accelerated ITS conversion / RAI process, and a hybrid that provides a blend of the benefits from both processes.

E. The TSTF requested the NRC approve or issue licensee-submitted TS bases when approving TS conversions. The NRC staff noted that, while TS are NRC-controlled licensing documents, TS bases are not. Changes to TS bases are controlled in accordance with 10 CFR 50.59 and the TS bases control program, as specified in the Administrative Control TS.

   The NRC staff also noted that 10 CFR 50.36(a) identifies TS bases as a required element of the current licensing basis without which a proposed TS licensing request would be incomplete. TS bases must be submitted with TS conversions and other TS amendment requests to support the requests.

**II. PUBLIC PARTICIPATION INVITED** - No comments received.

**III. ADJOURN**

**February 6, 2007 NRC-TSTF-FENOC Meeting Attendance**

| NAME | ORGANIZATION | E-MAIL |
|---|---|---|
| Bentley, William | FENOC (Davis-Besse) | wjbentley@firstenergycorp.com |
| Hearn, Pete | NRC/NRR/DIRS/ITSB | PCH@nrc.gov |
| Hoffman, Donald | EXCEL | donaldh@excelservices.com |
| Kobetz, Timothy | NRC/NRR/DIRS/ITSB | TJK1@nrc.gov |
| Marshall, Michael | NRC/DORL/LPL3-2 | MXM2@nrc.gov |
| Raleigh, Deann | Licensing Information Service | draleigh@scientech.com |
| Ray Schiele | EXCEL | Rays46@earthlink.net |
| Schulten, Carl | NRC/NRR/DIRS/ITSB | CSS1@nrc.gov |
| Telson, Ross | NRC/NRR/DIRS/ITSB | RDT@nrc.gov |
| Wengert, Thomas | NRC/NRR/DORL/Davis-Besse | TJW2@nrc.gov |

**Non-NRC Attendee Address List**

Technical Specifications Task Force
tstf@excelservices.com
11921 Rockville Pike
Suite 100
Rockville, MD 20852

Michael Crowthers (BWROG)
mhcrowthers@pplweb.com
PPL Susquehanna
Mail Code GENPL4
Two North Ninth Street
Allentown, PA 18101-1179

Wes Sparkman (WOG)
wasparkm@southernco.com
Southern Nuclear Operating Company
P. O. Box 1295 / Bin B048
Birmingham, AL 35201

Paul Infanger (BWOG)
Paul.Infanger@pgnmail.com
Crystal River Nuclear Plant
Mail Code NA1B
15760 W. Power Line Street
Crystal River, FL 34428

Brian Woods (WOG/CE)
woodsbl@songs.sce.com
mailstop: AWS-D3d
San Onofre Nuclear Generating Station
P.O. Box 128
San Clemente, CA 92674

Donald R. Hoffman (TSTF)
donaldh@excelservices.com
EXCEL Services Corporation
11921 Rockville Pike, Suite 100
Rockville, MD 20852

Brian Mann (TSTF)
brianm@excelservices.com
EXCEL Services Corporation
12624 Amershire Court
Glen Allen, VA 23059

Ray Schiele
Rays46@earthlink.net
EXCEL Services Corporation
11921 Rockville Pike, Suite 100
Rockville, MD 20852

William J. Bentley
wjbentley@firstenergycorp.com
Davis-Besse Nuclear Power Station
Mail Stop A-DB-3065
501 North State Route 2
Oak Harbor, OH 43449-9760

Deann Raleigh
draleigh@scientech.com
Licensing Information Service