

November 6, 2007

MEMORANDUM TO: Timothy J. Kobetz, Chief
Technical Specification Branch
Division of Inspection and Regional Support, NRR

FROM: Carl Schulten, Senior Reactor Engineer /RA/
Technical Specifications Branch
Division of Inspection and Regional Support

SUBJECT: MEETING WITH INDUSTRY REPRESENTATIVES ON THE RISK
MANAGEMENT TECHNICAL SPECIFICATIONS (RMTS) INITIATIVE 8a,
"RELOCATION OF LCOs THAT DO NOT SATISFY CRITERION OF 10
CFR 50.36"

On October 18, 2007, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and the Pressurized Water Reactor Owners Group Licensing Subcommittee (PWROG) at the NRC offices One White Flint North, Rockville, MD (Agencywide Documents Access Management System (ADAMS) No. ML072630361). A list of attendees is enclosed (Enclosure 1). The purpose of this meeting was to discuss the Initiative 8a program approach for re-evaluating, for relocation out of standard technical specifications (STS), limiting conditions for operation (LCOs) that do not satisfy 10 CFR 50.36(d)(2)(ii). The PWROG presentation slides are Enclosure 2.

The Initiative 8a program objective is to review reactor trip system (RTS) and engineered safety feature actuation system (ESFAS) instrumentation STS for Westinghouse plants, Combustion Engineering (CE) plants and Babcock and Wilcox (B&W) plants against 10 CFR 50.36(d)(2)(ii) Criterion 3 and 4 to determine which instrumentation functions do not satisfy Criterion 3 or 4. The outcome of the review would be a Technical Specification Task Force (TSTF) Traveler that would propose to relocate, to other licensee-controlled documents, any instrumentation functions that did not satisfy the 10 CFR 50.36(d)(2)(ii) criteria.

The PWROG noted that as part of the Technical Specifications Improvement Program, WCAP-11618, "MERITS Program Phase II, Task 5, Criteria Application Topical Report," dated November 12, 1987 was submitted for NRC staff review. WCAP-11618 identified STS LCOs that Westinghouse plant owners believed could be relocated to other licensee-controlled documents because the LCOs did not satisfy the 10 CFR 50.36(d)(2)(ii) criteria. Similar "Criteria Application" topical reports submittals were made by B&W and CE plant owners. Initiative 8a addresses the PWROG concern about conclusions reached by the NRC staff review of WCAP-11618 that RTS and ESFAS LCOs should be retained and that 10 CFR 50.36(d)(2)(ii) should not be used as the basis for relocating specific trip functions, channels, or instruments within these LCOs without the NRC staff making a determination on whether the identified RTS and ESFAS instrumentation functions satisfied Criterion 3 or 4. Although, the NRC staff questioned the need to re-evaluate WCAP-11618, the NRC staff is receptive to evaluating new analyses that could show that previous conclusions should be reconsidered.

T. Kobetz

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Other details regarding timing, content and NRC fees for reviewing Initiative 8 were discussed. The PWROG time line for completion is approximately two years (Spring 2010). A request for fee waiver will be made. The PWROG TSTF Traveler approach should ensure the NRC staff can avoid inefficient multiple, independent reviews.

No members of the public attended the meeting.

Enclosures:

1. Attendance List
2. Presentation Slides

cc w/encl: See attached page

T. Kobetz

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Other details regarding timing, content and costing of a proposed Initiative 8 review were discussed. The PWROG time line for completion is approximately two years (Spring 2010). A request for fee waiver will be made. The PWROG is seeking approval for staff review of a Traveler, this approach should ensure the NRC staff can avoid inefficient multiple, independent reviews.

No members of the public attended the meeting.

Enclosures:

1. Attendance List
2. Presentation Slides

cc w/encl: See attached page

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**RISK MANAGEMENT TECHNICAL SPECIFICATIONS
INITIATIVE 8a
RELOCATION OF LCOs THAT DO NOT SATISFY CRITERION OF 10 CFR 50.36.**

OCTOBER 18, 2007

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Enclosure

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