

November 28, 2007

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

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

SUBJECT: SUMMARY OF NOVEMBER 01, 2007, CATEGORY 2 MEETING WITH
THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TO
DISCUSS THE CURRENT STATUS AND ADMINISTRATIVE PROCESS
FOR TSTF SUBMISSIONS, AND FUTURE TSTF SUBMISSIONS.

On November 01, 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 TSTF's generic changes (Travelers) to the Standard Technical Specifications under consideration for submission by the TSTF, to review in-process Travelers, and to discuss NRC administrative processes associated with TSTF submissions. The meeting generally followed the agenda proposed in an October 17, 2007, Public Meeting Notice (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072850159) as amended by the meeting participants. Enclosure 1 contains the meeting minutes, enclosure 2 contains the attendee list, and enclosure 3 is a TSTF address list.

The following documents were provided for discussion during the meeting:

1. Public Meeting Agenda (ADAMS No. ML072850159)
2. TSTF Status Spreadsheet for 11-01-2007 meeting (ADAMS No. ML073050294)
3. CLIP Utilization handout (ADAMS No. ML073050295)

Enclosures:
As stated

cc: See next page

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Meeting Minutes

A meeting between NRC and the Technical Specifications Task Force (TSTF) was held on November 01, 2007, to discuss TSTF Travelers under consideration for submission by the TSTF, to review in-process TSTF Travelers, and to discuss NRC administrative processes associated with TSTF Travelers. The meeting followed the proposed agenda provided in an October 17, 2007, Public Meeting Notice (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072850159), as amended by the meeting participants. The following is a brief summary of the meeting.

I. Administrative

II. Process

NRC briefed the TSTF on results of the administrative process improvements made to date. NRC asked if the TSTF had suggestions to further improve the process. The TSTF asked that NRC communicate a milestone date change due to schedule slippage via a phone call. NRC stated that formal schedule change letter would only be written when a schedule slips by greater than approximately two weeks.

The TSTF asked what methodology was used by NRC to formulate work estimates for the review of Travelers. NRC stated that no formal estimate methodology is currently in place. The NRC added that Technical Reviewers rely on past precedents of similar work when developing estimates.

The TSTF stated that despite review fee exemption requests, all traveler reviews to date, with the exception of Travelers related to the Risk Management TS Initiatives, have been reviewed without fee exemptions. The TSTF asked NRC why requests for fee exemptions were rejected and asked if it was due to inadequate documentation in the requests. A representative from the NRC's Office of the Chief Financial Officer (OCFO) stated that the format and content of an exemption request is not used in the determination of whether or not a review meets the criterion for fee exemption contained in 10 CFR 170.11. The OCFO representative explained that personnel from the technical staff and OCFO determine if exemption criteria are met. The OCFO representative pointed out that if the TSTF submits a Traveler for review in response to an NRC request or Bulletin or Generic Letter, an exemption would be granted. The TSTF stated that it did not understand why the fee exemption request for the review of TSTF-500, "DC Electrical Rewrite - Update to TSTF-360" was rejected. The TSTF pointed out that they did not have a clear understanding of the criteria for fee exemption. The OCFO representative suggested future dialog between the TSTF and NRC. The TSTF stated that clarifying the criteria for fee exemptions would be helpful. The OCFO representative stated they would bring up the issue of a possible NUREG for guidance on 10 CFR 170.11b with higher management.

NRC stated its Fiscal Year 2008 goal for Traveler reviews was to have all reviews complete within 18 months of receipt. The goal may be revised to 75% of reviews complete by 15 months. NRC stated that if the goal is revised, increased communication of milestone changes will be required.

The TSTF briefed NRC on the status of its goals for 2007 and pointed out expectations for 2008. The TSTF asked if any goals for the release of revision 4 of LIC-101, "License Amendment Review Procedures" have been set. NRC stated that no firm goal has been set for the release of revision 4. The TSTF asked when LIC-601, "Technical Specification Conversion Accelerated Review" would be released. NRC stated LIC-601 would be refined with experience gained as the Davis-Besse TS conversion continues. The TSTF stated they would like to see LIC-601 issued in 2008 so they could use it to help licensees prepare for TS conversions. The TSTF would also like to see the review of TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions" completed as soon as possible but did not specify a date.

NRC and the TSTF discussed the recent rulemaking noticed in the Federal Register that changed 10 CFR 50.36(c) to 10 CFR 50.36(d). NRC stated there are currently interoffice discussions taking place aimed at resolving the problem. The TSTF stated the opinion that the most effective solution would be a rule making to change the reference from "d" back to "c".

III. Specific TSTF Traveler Issues

NRC presented the handout "TSTF Status Spreadsheet for November 1, 2007, meeting (ADAMS No. ML073050294)." The TSTF stated they would need more time to gather input from all stakeholders before responding to NRC's Request for Additional Information (RAI) regarding TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions." The TSTF expects to have the response to the RAI submitted to NRC by December 21, 2007, instead of November 1, 2007, as previously planned. NRC stated new milestone dates for the review of TSTF-493 will be determined once feedback from the reviewing technical branches is received.

NRC briefed the TSTF on the status of NRC review of TSTF-425, Rev. 1, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b," and stated that RAI's were complete. The NRC stated that is still intended to issue TSTF-425 for use in June 2008.

The TSTF briefed NRC on the efforts of the Boiling Water Reactors Owners' Group (BWROG) to resolve issues with TSTF-495, "Bases Change to Address GE Part 21 SC05-03." The TSTF is evaluating a TS change to accomplish what was intended to be accomplished with the original TSTF-495. The NRC reiterated its concern with the TSTFs attempt to modify the applicability of a safety limit by only modifying the TS bases.

The TSTF stated it had resolved RAI's related to TSTF-498, "Risk-Informed Containment Isolation Valve Completion Times (BAW-2461)." NRC stated that it does not see any other issues, and the review of TSTF-498 should stay on schedule.

NRC stated that in accordance with the TSTF letter received on October 31, 2007, all review fees for TSTF-500, "DC Electrical Rewrite - Update to TSTF-360," will be billed to the Pressurized Water Reactors Owners Group (PWROG), and that a review schedule would be issued in the near future.

IV. Issues with Previously Approved Travelers

The TSTF and NRC discussed the issue with the use of brackets in the Notice for Comment (NFC) regarding TSTF-477-A, Rev. 3, "Add Action for Two Inoperable Control Room AC Subsystems." TSTF-477 was published for comment in the Federal Register (FR) on

December 18, 2006. A comment stating that brackets should have been placed around all occurrences of "90°F" was received from the TSTF. The changes regarding the occurrences of "90°F" were not incorporated in the final Notice of Availability (NOA) published in the FR on March 26, 2007. A bracketed value would have allowed licensees to use plant specific values for their maximum control room temperature under this TSTF-477.

The TSTF stated that several licensees are unable to adopt TSTF-477 without first changing their licensing bases. NRC stated that licensees can use TSTF-477 to change their TS as long as they justify the deviations from the model. The TSTF stated that NRC told one licensee it would have to resubmit their License Amendment Request (LAR) for TS changes using TSTF-477 and they were also told the LAR could not be processed using the CLIIP. TSTF stated that one course of action may require publishing a corrected NOA in the FR, but was not sure that course of action was necessary. NRC will evaluate issuing a letter that would be referenced on the CLIIP web site to clarify the actions that licensees need to take regarding the maximum control room temperature limit in amendments proposing to adopt TSTF-477.

V. CLIIP Status

The TSTF presented "CLIIP Utilization handout" (ADAMS No. ML073050295), and briefed NRC on the status of CLIIP adoptions by licensees. NRC asked the TSTF if it had any means to accurately estimate the number of CLIIP related LARs expected in the coming years. The TSTF responded that hard numbers were not available.

VI. Future Planning

The TSTF briefed the NRC on a possible plan to submit a Traveler under the CLIIP program. The Traveler would standardize sections 1.0, 3.0, and 5.0 of TS using several previously approved travelers. NRC suggested a presubmittal meeting. The TSTF suggested adding it to the agenda of the next TSTF/NRC public meeting.

VII. Technical Issues

Since levels of activity in reactor coolant have decreased, containment gaseous radiation monitors may no longer be able to meet the 1 GPM sensitivity requirements for leakage detection applications. NRC and the TSTF discussed the TSTF's proposal regarding the equipment required in the Reactor Coolant System Leakage Detection Instrumentation section of TS. NRC restated the technical branch's view, discussed at previous TSTF meetings, that when the instrument can not meet operability requirements, rather than have the detector's operability definition modified, the detector should be removed from TS requirements. NRC noted that precedents had been set in the past when previous license amendments requested to remove the instruments. NRC stated that a convincing technical argument for changing completion times would have to be presented to and accepted by the technical branch in order for the proposed TS change to be considered. NRC further stated that all TSTF proposed changes would be considered by the NRC, however no official acceptance or rejection of TSTF proposals would be formally or informally declared at TSTF meetings.

VIII. Next Meeting

The next public TSTF/NRC meeting was tentatively scheduled for March 27, 2008.

IX. Public Participation Invited

No public input received

X. Adjourn

November 01, 2007 NRC-TSTF Meeting Attendance

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