

January 21, 2008

MEMORANDUM TO: Gerald Waig, Acting 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 JANUARY 10, 2008, CATEGORY 2 MEETING WITH
THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TO
DISCUSS RECURRING COMMENTS ON PUBLISHED MODELS

On January 10, 2008, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC), and representatives of the Technical Specifications Task Force (TSTF) at U.S. Nuclear Regulatory Commission Headquarters, 11555 Rockville Pike, Room O-16B2, Rockville, MD 20852. The purpose of the meeting was to discuss recurring comments on published models for Travelers. The meeting generally followed the agenda proposed in a December 11, 2007, Public Meeting Notice (Agencywide Documents Access and Management System (ADAMS) Accession No. ML073240776) 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. ML073240776)
2. Recurring Comments on Model LARs SEs and NSHCs (ADAMS No. ML080100628)

Enclosures:
As stated

cc: See next page

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DATE	1/18/2008	1/21/2008

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Meeting Minutes

A meeting between NRC and the Technical Specifications Task Force (TSTF) was held on January 10, 2008, to discuss recurring comments on published models for Travelers. The meeting generally followed the agenda proposed in a December 11, 2007, Public Meeting Notice (Agencywide Documents Access and Management System (ADAMS) Accession No. ML073240776) as amended by the meeting participants. The following is a brief summary of the meeting.

- I. Administrative
- II. Discussion of recurring comments

The TSTF noted the success of the Consolidated Line Item Improvement Process (CLIIP). The TSTF also noted recurring comments made on model License Amendment Requests (LARs), model Safety Evaluations (SEs), and model No Significant Hazards Considerations (NSHCs) published in the Federal Register (FR) by NRC for public comment. The TSTF stated that further improvements to the efficiency of the CLIIP could be made if NRC takes measures to eliminate or reduce recurring comments. The TSTF presented the handout "Recurring Comments on Model LARs SEs and NSHCs" (ADAMS No. ML080100628). Discussion summaries for each comment are listed below.

Regarding Comment 1, NRC and the TSTF discussed several methods to ensure the correct language of oath or affirmation statements is included in model LARs. One method would contain a verbatim repetition of the statement contained in RIS 2001-18, "Requirements for Oath or Affirmation." An alternate method would simply state that licensees should include a statement consistent with the guidance contained in RIS 2001-18.

For Comment 2, the NRC will evaluate the use of the following language to resolve the TSTF's comment: "Significant variations from the approach, or inclusion of additional changes to the license, will result in NRC staff rejection of the CLIIP submittal. Instead, licensees desiring significant variations and/or additional changes should submit a LAR that does not request to adopt TSTF-XXX under the Consolidated Line Item Improvement Process."

To resolve Comment 3, the TSTF recommended NRC use the following sentence in the model NSHCs: "The Proposed Change Does Not Create the Possibility of a New or Different Kind of Accident from any Accident Previously Evaluated." NRC agreed with the recommendation.

Immediate resolution of Comment 4 was not reached. The TSTF stated that providing retyped pages with an amendment and then again at the end of the review is redundant and time consuming. NRC stated that retyped Technical Specification (TS) pages are required to understand some complex proposed changes. One proposed resolution put forth would be to use a phrase similar to "the licensee should submit retyped TS pages" in the models. Another possible resolution would direct the licensee to contact the NRC licensing project manager for guidance on whether or not retyped TS are required for the particular LAR.

NRC took the TSTF's suggestion in Comment 5 under advisement, and will evaluate the issue.

NRC stated that internal discussion with the Division of Operating Reactor Licensing would be necessary to determine if it would be possible to use the TSTF's suggestion listed in Comment 6.

Immediate resolution of Comment 7 was not reached. The NRC stated that the review of a proposed license amendment involving Bases changes is more efficient if Bases changes pages are submitted by the licensee. The TSTF acknowledged that the Bases changes in some Travelers contain information important to the NRC in the performance of their review, but stated that in many cases the Bases simply restate information in the justification and contain no material information. NRC stated that they have had instances in which the licensee has proposed changes to the Bases which would have changed the intent of the TS change. The NRC stated that if the Bases change is trivial or the same Bases change is being made many times, the licensee could simply describe the Bases change in the LAR instead of submitting the Bases pages. The NRC and the TSTF also discussed the fact that there is disagreement on the requirements regarding Bases in 10 CFR 50.90. The NRC pointed out that the industry could submit a request for rulemaking to clarify the requirements and resolve the disagreement.

III. Public Participation

In regards to Comment 7, Michael Richardson of Diablo Canyon stated that of the 275 pages of markups included in their submittal of TSTF-425, a significant fraction of the pages were Bases changes consisting of one of several almost identical inserts and by not submitting the Bases changes, the amendment could have been significantly smaller with no loss of material information.

IV. Adjourn

January 10, 2008 NRC-TSTF Meeting Attendance

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