

May 29, 2008

MEMORANDUM TO: Robert B. Elliott, 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 April 29, 2008 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 April 29, 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. NRC Headquarters, 6003 Executive Boulevard, 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 April 16, 2008 Public Meeting Notice (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081050165) 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. ML081050165)
2. TSTF 2008 Priorities (ADAMS No. ML081260035)
3. COM-106, Rev 3 Handout (ADAMS No. ML081260033)
4. Active Travelers Status Report (ADAMS No. ML081260034)
5. CLIIP Utilization handout (ADAMS No. ML081260030)
6. CLIIP Adoption Status (ADAMS No. ML081260025)

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 April 29, 2008 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 April 16, 2008, Public Meeting Notice (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081050165), as amended by the meeting participants. The following is a brief summary of the meeting.

I. Administrative

NRC briefed the TSTF on the effects of staffing level changes in the Technical Specifications Branch (ITSB). NRC requested that the TSTF identify their priorities for Traveler reviews. NRC stated that ITSB will apply more stringent acceptance standards for License Amendment Requests (LARs) submitted as part of the Consolidated Line Item Improvement Process (CLIIP). NRC also stated that it is attempting to restore staffing levels in the ITSB.

The TSTF stated that the most recent schedule revision letter for TSTF-425, Revision 2 "Relocate Surveillance Frequencies to Licensee Control – RITSTF initiative 5," was not received via email. NRC stated it would ensure the process of emailing pdf versions of scheduling letters would continue.

II. Process

The TSTF requested clarification from NRC regarding criteria that would prevent a License Amendment Request (LAR) from being reviewed as part of the CLIIP. NRC stated that when technical staff input is required to complete a LAR review, the LAR can not be processed as a CLIIP review. TSTF stated that licensee would have to expend more resources if they are asked to rejustify their current licensing bases. TSTF will communicate the fact that licensees do not necessarily have to request a CLIIP review of LARs based on TSTF Travelers that were approved for use as part of the CLIIP. NRC and the TSTF agreed that TSTF Travelers approved for use as part of the CLIIP can be used as a LAR guide for licensees. NRC suggested not writing the term CLIIP in a LAR if there is not close alignment between the applicability of the models published for the TSTF Traveler, and the licensee's particular situation. Instead, licensees can simply refer to the TSTF number as a reference in the LAR.

NRC and the TSTF discussed the rulemaking noticed in the Federal Register that changed 10 CFR 50.36(c) to 10 CFR 50.36(d). NRC stated different methods of resolving the problem are being evaluated. NRC stated the time to resolve the issue could take between 1 to 2 years, depending on the resolution method.

NRC stated its Fiscal Year 2008 goal for Traveler reviews was to have 80% complete within 12 months of receipt and all reviews complete within 18 months of receipt. NRC stated that current projections show that the goal will not be met. TSTF pointed out that the number of Travelers under review is relatively low compared to previous years. NRC stated that project management of Traveler reviews will be transferred to the branch that handles Topical Report reviews. The TSTF stated that it doesn't feel that shifting project management roles to a

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different branch may not be the best plan because the focus on Technical Specifications may be lost.

The TSTF presented the handout "TSTF 2008 Priorities" (ADAMS No. ML081260035) to NRC. The TSTF stated that it would like to see how LIC-101, Revision 4 address the issue of Travelers. NRC pointed out that the TSTF's priority 5 may not have large generic applicability. The TSTF responded that over the next few years many licensees will adopt Risk Informed TSTF (RITSTF) initiative 4b.

The TSTF presented a highlighted version of COM-106, Revision 3 "Control of Task Interface Agreement" as a handout (ADAMS No. ML081260033). The TSTF discussed the recent Arkansas Nuclear One Task Interface Agreement (TIA) for Limiting Condition for Operation (LCO) 3.0.5. The TSTF stated that the licensee submitted a white paper regarding the interpretation of LCO 3.0.5, but had no input during the TIA process after submitting the white paper. The TSTF stated that licensee input during the TIA process would be helpful to all parties. NRC stated that allowance for public involvement in NRC/Licensee interactions must be made. TSTF asked for more detailed discussions of the TIA process. NRC suggested discussing TIAs in a separate meeting.

III. Specific TSTF Traveler Issues

The TSTF presented the handout "Active Travelers Status Report" (ADAMS No. ML081260034).

The TSTF proposed a meeting with the review manager for TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions." NRC stated that a meeting could be arranged.

NRC stated TSTF-498, "Risk-Informed Containment Isolation Valve Completion Times (BAW-2461) RITSTF Initiative 4A" is currently being reviewed by the NRC staff.

NRC stated that Requests for Additional Information (RAIs) for TSTF-500, "DC Electrical Rewrite - Update to TSTF-360" would be sent to the TSTF by 5/2/08.

NRC stated that a second round of RAIs may be necessary for TSTF-501, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control." The TSTF urged NRC to carefully review the RAI and its necessity prior to sending it to the TSTF.

The TSTF stated that it was considering submitting a rule making proposal to expand the scope of fee exemption criteria in 10 CFR 170.

NRC stated that an initial acceptance and scheduling letter for TSTF-506, "Revise Primary Containment and Drywell Hydrogen Igniter Specification to Not Require Recombiners" should be sent to the TSTF shortly.

IV. Issues with Previously Approved Travelers

NRC stated that an internal staff meeting will be held to determine a path forward for TSTF-423, "Risk-Inform Requirements Regarding Selected Required Action End States" and other RITSTF. TSTF suggested a public meeting if methods for processing RITSTF are changed. NRC stated that a public meeting would not be ruled out, but that it may not be necessary at this point.

The TSTF stated that some licensees have been asked to adopt license commitments when requesting adoption of TSTF-439, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO." The TSTF requested a discussion on the issue at a later date.

V. CLIP Status

The TSTF presented the handouts "CLIP Utilization" and "CLIP Adoption Status (ADAMS Nos. ML081260030, and ML081260025), and explained the statistics on licensees' use of the CLIP. The TSTF stated that review fees for CLIP LARs are roughly 10% of those for a standard LAR. The NRC stated that the handouts are useful for the agency.

VI. Technical Issues

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. NRC stated it would email a memo from ITSB reviewers to the ITSB branch chief that addresses the issue with TSTF-477. NRC suggested a separate meeting, if necessary, after the TSTF review that memo.

VII. Future Planning

NRC stated that it would only be able to support 1 TS conversion project at any given time due to staffing issues. TSTF stated that they would work with NRC to prevent overlapping applications for TS conversion. TSTF stated that Kewaunee is tentatively planning to submit a TS conversion application in June 2009.

The TSTF briefed the NRC on its plan to submit a Traveler under the CLIP program. The Traveler would standardize sections 1.0, 3.0, and 5.0 of TS using several previously approved travelers. The TSTF plans to submit the Traveler in roughly six weeks. The TSTF suggested a post submission meeting to discuss justification for Travelers to be included.

The TSTF stated it is considering a Traveler to move topical report references from section 5 of the Standard Technical Specifications (STS), to the Core Operating Limits Report (COLR). NRC suggested discussing the issue with the pertinent technical branches.

VIII. Next Meeting

The TSTF suggested a monthly conference call between NRC and TSTF to discuss on going TSTF issues. The TSTF suggested a conference call on 6/3/08 at 2:00 pm.

The next public TSTF/NRC meeting was tentatively scheduled for September 11, 2008.

IX. Public Participation Invited

A member of the public requested clarification on the ANO TIA discussion. The TSTF stated they would provide documentation mentioned in the ANO TIA discussion to the member of the public.

X. Adjourn for Lunch

Meeting to Discuss Proposed TSTF Traveler for Reactor Coolant System (RCS) Leakage Detection Instrumentation TS's

I. Discussion of Issue History

NRC and TSTF reviewed the history of the issue and the discussions held at past public meetings between the TSTF and NRC. Current RCS Leakage Instrumentation Standard Technical Specifications (STS) may require that a gaseous activity monitor be capable of detecting a 1gpm RCS leak within an hour. Due to the fact that the integrity of the fuel is greater today than in the past, the gaseous activity monitor may no longer be capable of detecting a 1gpm RCS leak within an hour. As a result, STS regarding RCS Leakage Instrumentation may need to be modified to reflect current plant conditions.

II. TSTF Proposed STS Change

The TSTF has proposed modifications to the Standard Technical Specifications at past public meetings on November 30, 2006, and July 19, 2007. The TSTF feels there are two options to address the issue of RCS leakage detection instrumentation. The first option would involve removing Gaseous Activity channels from STS and increasing RCS inventory frequency. The second option would involve keeping the Gaseous Activity channels in STS and restricting the LCO Required Action Completion Times and Bases that reflect the availability and sensitivity of the design of gaseous monitors and personnel actions commensurate with plant operating conditions. The TSTF stated it prefers the second option.

III. NRC Technical Position

NRC stated that it had concerns with the adequacy of the acceptance criteria in the surveillance requirements in the proposed revisions to the STS.

IV. Proposed Actions

The TSTF stated that it would pursue a Traveler based on the first option mentioned above and consistent with the TS of some licensees

V. Public Participation Invited

VI. Adjourn

Enclosure