

February 2, 2009

MEMORANDUM TO: Stacey L. Rosenberg, Chief  
Special Projects Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Joseph F. Williams, Senior Project Manager */RA/*  
Special Project Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JANUARY 8, 2009, MEETING WITH PRESSURIZED  
WATER REACTOR AND BOILING WATER REACTOR OWNERS  
GROUPS REGARDING SELECTED TECHNICAL SPECIFICATION  
TASK FORCE ISSUES

On January 8, 2009, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff, and representatives of the Pressurized Water Reactors (PWRs) Owners Group (PWROG) and Boiling Water Reactors (BWRs) Owners Group (BWROG). The purpose of this meeting was to discuss issues associated with three Technical Specification Task Force (TSTF) Travelers and a draft Regulatory Issue Summary (RIS) associated with one of the Travelers. A list of attendees is enclosed. No handouts were distributed at the meeting.

The NRC staff began with discussion of TSTF-423, "Technical Specifications End States." The NRC staff identified concerns regarding implementation of this item in September 2008. The NRC staff determined that primary containment had been mistakenly included within the scope of TSTF-423. The NRC staff also determined that TSTF-423 provided an unintended loophole which could allow a licensee to start up a power plant with inoperable equipment, when TSTF-423 was intended only to facilitate avoidance of unnecessary shutdowns when equipment problems are found while at power.

The meeting participants discussed options for addressing TSTF-423 issues. The industry representatives indicated that a letter from the NRC staff discussing the issues and the need to revise TSTF-423 would be beneficial, and noted their intent to seek a fee waiver for NRC review associated with generic resolution of the issues.

The industry representatives proposed to resolve the issue using license amendment for a pilot plant. Once the pilot plant amendment is approved, the industry representatives believe the associated application and evaluation could form the basis for additional amendments via the Consolidated Line Item Improvement Program process. Pending amendments for several Exelon facilities can serve as the pilot applications. The NRC staff indicated that this approach is viable.

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The meeting attendees then discussed TSTF-513, "Revise Operability Requirements and Actions for RCS [Reactor Coolant System] Leakage Instrumentation," which applies to PWRs. The revised notice for this meeting issued on December 29, 2008, included a draft RIS associated with this topic and is available in the Agencywide Documents Access and Management System (ADAMS) as Accession No. ML083640134.

The draft RIS describes NRC's plans to address a long-standing issue of very low safety significance. As licensees have improved the radiological cleanliness of RCSs, the length of time required for a gaseous radiation monitor to detect a given volume of RCS leakage has increased, leading to questions regarding whether these detectors are capable of fulfilling their design functions. The NRC actions described in the draft RIS, including review of TSTF-513, are intended to clarify expectations for the radiation monitors.

The industry representatives indicated that they understand the NRC's plans to resolve this issue, and described planned revisions to TSTF-513 to improve clarity and facilitate the NRC staff's review. The representatives also said that a forthcoming TSTF addressing the issue for BWRs will include similar information.

The meeting participants discussed comments on the draft RIS. The principal comment by the industry representatives was directed towards the expectation that licensees should submit license amendments to resolve the issue within 4 months of the relevant TSTF approval in order to continue receiving enforcement discretion. The industry representatives consider 6 months to be a more reasonable period, given the low safety significance of the issue. The NRC staff stated that they would consider the comment as the RIS is completed. The NRC staff projected that the RIS would be issued by mid-January 2009.

The last topic discussed was TSTF-493, "Clarify Application of Setpoint Methodology for LSSS [Limiting Safety System Setting] Functions." The industry representatives provided feedback on NRC letter dated November 4, 2008 (ADAMS Accession No. ML082800484), which described a range of options to resolve issues. The PWROG and BWROG representatives indicated that in discussions amongst the owners groups in December 2008, it was agreed that TS safety limit LSSSs will be addressed in a manner consistent with the NRC staff position described in the letter dated November 4, 2008, and that a TS bases statement regarding treatment of non-safety limit LSSS would be provided. The NRC staff stated that the industry approach seems reasonable. The representatives stated that they are trying to encourage consistent application of the resolution throughout the industry, and that a description of the industry approach will be provided by the end of January 2009.

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ADAMS Accession No: ML090130583

NRR-106

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NAME	JWilliams	DBaxley	RElliot	SRosenberg
DATE	02/2/09	02/2/09	01/30/09	02/2/09

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Technical Specification Task Force

Project No. 753

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Attendees

Meeting with the Pressurized Water Reactors and Boiling Water Reactors Owners Groups

January 8, 2009

<u>Name</u>	<u>Affiliation</u>
Douglas Coleman	BWROG
Michael Leisure (via telephone)	Duke
Jerry Voss	Excel
Tim Abney	GE Hitachi
Dennis Buschbaum	Luminant/PWROG
Andrew Johnson	MNES
Joe Williams	NRC
Jack Donohew	NRC
Ravi Grover	NRC
Matthew Hamm	NRC
Mike Cheok	NRC
Pamela Henderson	NRC
Carl Schulten	NRC
Fred Brown	NRC
Hukam Garg	NRC
Bill Kemper	NRC
Rob Elliott	NRC
Craig Harbuck	NRC
Deann Raleigh	Scientech
Chris Riedl	Tennessee Valley Authority
Brian Mann	TSTF/Excel
Donald Hoffman	TSTF/Excel
Chad Holderbom	Westinghouse

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