

Kewaunee Conversion Pre-Submittal Meeting

ITSB Topics for Discussion

Based on internal ITSB discussions of lessons learned from previous Tech Spec Conversions including Davis Bessie (18-19 Dec. 2008)

Preparation of Submittal

- The completeness and complexity (or simplicity) of the submittal affects evaluation process
- Submittal letter must confirm that the CD is equivalent to hard copy
- STS 3.0 is the latest version and basis for conversion, not 3.1
- List all TSTF's adopted that are not incorporated into STS Revision 3.0
 - List all TSTF's adopted in which all aspects of the TSTF were not followed (i.e. deviations, not adopting commitments, etc)
- All submittals should state if a commitment or license condition has been added modified or deleted
- Identification of Beyond Scope Items (BSI)
 - Current Licensing Basis
 - Definition
 - Review of CLB during Conversion evaluation

Review Process Overview and Lessons Learned

- Describe typical stages and schedule
- Definition and impact of "Beyond Scope Items" (BSI)
 - They are generally characterized as changes that differ from both the existing technical specifications and the improved STS
 - As defined in NRC Administrative Letter 96-04, BSIs are those changes to the technical specifications that are not directly related to the conversion amendment.
 - NEI 96-06, Improved Technical Specifications Conversion Guidance, similarly identifies BSIs as changes, such as plant-specific risk-based changes and power uprates, which are considered beyond the scope of the ITS conversion application and therefore may result in delays in ... approval of the application.
- Use of Bases during review
- Use of RAI's during review
- Use of Current Licensing Basis during review
- Items requiring Technical Branch Review
 - List of examples

Other Items

- Plant responsiveness
 - Effect of refueling outages during evaluation period?
 - Timely and thorough
- Applicability of precedent
- Ongoing reviews of TSTF's can impact conversion
- Use of Excel Services Database
 - Used for both informal questions and information requests
 - Unresolved issues may elevate quickly to RAI's