

June 18, 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 JUNE 4, 2009, MEETING WITH THE TECHNICAL  
SPECIFICATION TASK FORCE

On June 4, 2009, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Technical Specifications Task Force (TSTF). The purpose of this meeting was to discuss status of current and planned TSTF Travelers, and process and administrative issues of mutual interest. A list of attendees is provided in Enclosure 1. A copy of the handout provided by the TSTF is provided in Enclosure 2.

Meeting participants discussed the status of current TSTF submittals. In the discussion of TSTF-425, "Relocate Surveillance Frequencies to Licensee Control," the NRC staff noted that this and other risk-informed initiatives can be beneficial in preparation for a possible pandemic. Licensee implementation of these items can help avoid resource challenges and permit continued safe operation by providing flexibility to respond to plant issues if utility or NRC staffing is affected by a pandemic.

Participants discussed issues with previously-approved TSTF travelers. There have been several recent examples where NRC staff has identified issues with approved travelers during review of plant-specific license amendment requests. NRC meeting attendees stated that the staff is encouraged to maintain a questioning attitude and to identify safety issues, while also being held to a rigorous standard for demonstration of conformance to regulatory requirements.

Issues which can arise from incomplete documentation of the basis for acceptance of approved travelers. In reviewing plant-specific amendments, the NRC staff must provide a safety evaluation describing the basis for approval or denial of the proposed change. If the approved traveler lacks a well-documented basis, the process of developing that information in a plant-specific change can result in problems being identified.

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Issues have also arisen in cases where better documentation exists, such as travelers approved by the Consolidated Line Item Improvement Process (CLIIP). The staff has identified examples where a CLIIP traveler could be applied in a manner unexpected at the time the item was originally reviewed. In such cases, the staff may need to develop means to restrict the unintended scope of the traveler so that a possible safety issue can be avoided.

Meeting participants discussed examples of issues, and agreed that industry and NRC should develop means to address these issues and provide clear guidance to stakeholders on processes used to address them.

Development of Revision 4 of the improved Technical Specifications was also discussed. Stakeholders expressed interest in having a Word version of Revision 4 available from NRC. The staff agreed this would be desirable.

Actions from a workshop on Technical Specification issues were discussed. Among other things, the TSTF stated that travelers will be developed to support clarification of Limiting Condition for Operation (LCO) 3.0.4.a, LCO 3.0.5, and the term "operational convenience." NRC staff noted that it may be worthwhile to consider reliance on only LCO 3.0.4.b, which could provide better integration of risk assessments into routine plant operation.

The next NRC meeting with TSTF was tentatively planned for Thursday, November 5, 2009. The staff suggested that planning for this meeting begin in mid-September 2009 to facilitate development of a comprehensive agenda and early resolution of any logistical issues.

Questions regarding this meeting can be directed to me at 301-415-1470, or [joseph.williams@nrc.gov](mailto:joseph.williams@nrc.gov).

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Enclosure:

1. Attendee List
2. Meeting Slides

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DATE	6/15/09	6/15/09	6/16/09	6/17/09	6/18/09

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Attendees  
NRC Meeting With Technical Specification Task Force  
June 4, 2009

<u>Name</u>	<u>Affiliation</u>
Brian Mann	TSTF
Don Hoffman	TSTF
Thomas Raidy	TSTF/SCE
John Messina	TSTF/Boiling Water Reactor Owners Group
Ken Schrader	TSTF/Pressurized Water Reactor Owners Group
Joe Williams	NRC
John Hughey	NRC
Ravi Grover	NRC
Vic Cusamano	NRC
Matthew Hamm	NRC
Mark Kowal	NRC
Bob Tjader	NRC
Rob Elliott	NRC
Peter Bamford	NRC
Mark Blumberg	NRC
Carl Schulten	NRC
Aron Lewin	NRC
Robert Sharpe	AREVA-NP