

# TSTF/NRC Meeting

June 4, 2009

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# Administrative Issues

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## TSTF Process Issues

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## Traveler Status

Recent Development are in yellow.

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Technical Specifications Task Force  
A Joint Owners Group Activity

TSTF

## Traveler Activities

6/1/2009

Description	2006	2007	2008	2009
Travelers Approved	8	9	1	1
Notices of Availability Published	6	9	1	1
Notices for Comment Published	9	5	1	0
NRC Letters (RAIs, etc.)	28	27	13	7
TSTF Letters	35	31	22	13

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## Travelers Scheduled to be Approved in 2009

1. TSTF-425, "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b" (NoA scheduled mid-June)
2. TSTF-446, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)" (NfC scheduled in June)
3. TSTF-500, "DC Electrical Rewrite - Update to TSTF-360" (Sending revision but NfC drafted)
4. TSTF-501, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control" (NfC scheduled in June)
5. TSTF-513, "Revise PWR Operability Requirements and Actions for RCS Leakage Instrumentation"
6. TSTF-514, "Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation"

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<b>TSTF</b> <span style="float: right;">Technical Specifications Task Force A Joint Owners Group Activity</span> <b>TSTF-425, Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b (All) High Priority - 2009 Opportunity</b>	
Date	Event
6/11/2004	Limerick lead plant amendment submitted.
8/31/2004	TSTF submits TSTF-425, Rev. 0. Only applicable to BWRs.
2/3/2005	NEI submits NEI 04-10, "Risk-Informed Technical Specifications Initiative 5b Risk-Informed Method for Control of Surveillance Frequencies."
9/28/2006	NRC approves NEI 04-10, and the Limerick lead plant license amendment.
2/5/2007	NRC closes the TAC and stops review of TSTF-425, Revision 0 pending submittal of NEI 04-10 methodology document revision addressing the applicability to PWRs and Staggered Test Basis Frequencies.

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<b>TSTF</b> <span style="float: right;">Technical Specifications Task Force A Joint Owners Group Activity</span> <b>TSTF-425, Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b (All) High Priority - 2009 Opportunity</b>	
Date	Event
4/19/2007	NEI 04-10, Rev. 1, submitted addressing Staggered Test Basis Frequencies.
4/20/2007	TSTF-425, Rev. 1, submitted referencing NEI 04-10, Rev. 1, and including all ISTS NUREGs.
6/7/2007	NRC issues Acceptance and Review Milestone letter for TSTF-425, Rev. 1. RAIs scheduled for 10/31/2007. Notice of Availability scheduled for 6/28/2008.
9/19/2007	NRC approval of NEI 04-10, Rev. 1
10/2/2007	NRC issues RAI on TSTF-425, Rev. 1.

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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-425, Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b</b>		
Date	Event	
1/17/2008	TSTF responds to RAI and submits TSTF-425, Rev. 2.	
3/31/2008	NRC issues Acceptance and Schedule Milestone letter for Rev. 2. Notice for Comment scheduled for 5/28/2008. Notice of Availability scheduled for 8/28/2008.	
7/16/2008	The TSTF was informed that the NRC is resolving comments from the OGC and the Notice for Comment is expected to be issued by the end of July.	
12/5/2008	NRC issues Notice for Comment	
1/5/2009	TSTF responds to the Notice for Comment	
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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-425, Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b</b>		
Date	Event	
1/30/2009	TSTF/NRC discuss TSTF comments on Notice for Comment.	
3/18/2009	TSTF submits TSTF-425, Rev. 3, to conform with the NRC changes in the draft Safety Evaluation.	
5/15/2009	NRC issues Temporary Inspection Instruction 2515/178, "Risk Management Technical Specifications , Initiative 5b, Surveillance Frequency Control Program"	
5/30/2009	NRC to issue Notice of Availability for TSTF-425.	

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### TSTF-426, Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b & 6c (CE) **Medium Priority**

Date	Event
10/3/2003	WCAP-16125, Rev. 0, "Justification for Risk-Informed Modifications to Selected Technical Specifications for Conditions Leading to Exigent Plant Shutdown," submitted to NRC for review.
7/9/2004	NRC approves WCAP-16125, Rev. 0.
8/30/2004	TSTF-426, Rev. 0, submitted. Justification based on WCAP-16125, Rev. 0.
11/13/2004	NRC provides RAIs on TSTF-426, Rev. 0
4/27/2005	TSTF responds to NRC RAI.

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### TSTF-426, Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b & 6c

Date	Event
7/20/2006	NRC issues the Notice for Comment for TSTF-426, Rev. 0.
8/21/2006	TSTF responds to Notice for Comment.
11/27/2006	NRC requests revisions to TSTF-426, Rev. 0 and to WCAP-16125.
1/18/2007	A public meeting with the NRC is held to discuss WCAP-16125 and TSTF-426. The industry agrees to revise TSTF-426 and WCAP-16125.
2/5/2007	NRC sends letter to TSTF closing the TAC and stopping review for TSTF-426, Rev. 0

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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-426, Revise or Add Actions to Preclude Entry into LCO</b> <b>3.0.3 - RITSTF Initiatives 6b &amp; 6c</b>		
Date	Event	
1/7/2008	The PWROG submits WCAP-16125, Rev. 1, to address NRC comments.	
7/22/2008	The NRC provides an Acceptance and Schedule Milestone letter for WCAP-16125, Rev. 1.	
8/5/2008	The TSTF submits TSTF-426, Rev. 1, addressing NRC comments and referencing WCAP-16125, Rev. 1.	
1/27/2009	NRC provides RAI on WCAP-16125	
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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-426, Revise or Add Actions to Preclude Entry into LCO</b> <b>3.0.3 - RITSTF Initiatives 6b &amp; 6c</b>		
Date	Event	
1/27/2009	NRC provides RAI on WCAP-16125	
5/8/2009	PWROG submits RAI response revised WCAP-16125	
5/27/2009	TSTF distributes revised TSTF-426 for industry review. Revised to reflect revised WCAP-16125.	
5/27/2009	PWROG informs TSTF that NRC has provided comments on the WCAP and will not accept some of the changes in TSTF-426.	
Pending	Awaiting NRC formal RAI on WCAP-16125 prior to revising TSTF-426.	
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### TSTF-431, Change in Technical Specifications End States (BAW-2441) (B&W) **High Priority**

Date	Event
1/19/2004	The B&WOG submits BAW-2441, Rev. 2, "Risk Informed Justification for LCO End-State Changes," to the NRC for review.
8/25/2006	The NRC approves BAW-2441, Rev. 2.
11/3/2006	The TSTF submits TSTF-431, Rev. 1. (TSTF-431, Rev. 0, was not submitted for NRC review as it was superseded by the NRC's approval of BAW-2441, Rev. 2.)
12/5/2005	The NRC issues a letter to the TSTF granting a fee exemption for TSTF-431.
3/16/07	The NRC provides a letter with Schedule Milestones. RAIs scheduled for 4/15/2007 Notice of Availability scheduled for 12/31/2007.

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### TSTF-431, Change in Technical Specifications End States (BAW-2441)

Date	Event
5/3/2007	The NRC provides a Request for Additional Information.
7/9/2007	The TSTF responds to the NRC's RAI.
7/12/2007	In a teleconference, the NRC technical reviewer stated that he would not accept a change to the Containment Specification end state regardless of the NRC approval of the justification for the change in BAW-2441.
7/13/2007	After conferring with the B&W plants, the TSTF submits TSTF-431, Rev. 2, removing the change to the Containment Specification end state change.
11/3/2007	The NRC publishes the Notice for Comment for TSTF-431, Rev. 2.

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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-431, Change in Technical Specifications End States (BAW-2441)</b>		
Date	Event	
12/21/2007	The TSTF provided comments on the Notice for Comment by e-mail.	
3/25/2008	The NRC informed the TSTF that the scheduled date for the Notice of Availability of 4/11/2008 would be delayed due to concerns regarding inclusion of Tier 2 commitments in the Technical Specifications and acceptability of RITSTF Initiative 1 changes.	
1/30/2009	The NRC to provide a letter to the TSTF requesting revision of TSTF-431 to address applicability of LCO 3.0.4.	
Pending	TSTF to revise TSTF-431 following receipt of NRC letter on Initiative 1 Travelers.	

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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-446, Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791) High Priority - 2009 Opportunity</b>		
Date	Event	
6/6/2002	The WOG submits WCAP-15791, Rev. 0, "Risk-Informed Evaluation of Extensions to Containment Isolation Valve Completion Times"	
10/25/2002	The TSTF submits TSTF-446, Rev. 0, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)"	
5/6/2004	The WOG submits WCAP-15791, Rev. 1.	
1/31/2005	The TSTF submits TSTF-446, Rev. 1, to address responses to NRC RAI's on WCAP-15791.	
3/10/2006	The NRC approves WCAP-15791, Rev. 1.	

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<b>TSTF</b>		<b>Technical Specifications Task Force</b> <i>A Joint Owners Group Activity</i>
<b>TSTF-446, Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)</b>		
Date	Event	
9/28/2006	The NRC approves the Wolf Creek lead plant license amendment.	
1/11/2007	The TSTF submits TSTF-446, Rev. 2, containing changes to be consistent with WCAP-15791 and to incorporate lessons-learned from the lead plant amendment.	
5/29/2007	The NRC sends a letter to the TSTF stating that they are halting their review of TSTF-446 pending receipt of a revised WCAP-15791 incorporating changes consistent with the draft Safety Evaluation.	
6/12/2007	The TSTF submits a letter to the NRC requesting restart of the TSTF-446, Rev. 2 review based on submittal of the revised WCAP-15791 on May 25, 2007.	
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<b>TSTF</b>		<b>Technical Specifications Task Force</b> <i>A Joint Owners Group Activity</i>
<b>TSTF-446, Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)</b>		
Date	Event	
9/14/2007	The NRC provides and Acceptance and Schedule Milestone letter on TSTF-446, Rev. 2. RAIs scheduled to be provided on 10/12/2007. Notice of Availability scheduled to be published on 4/30/2008.	
10/11/2007	The NRC provided comments and questions on TSTF-446 during a teleconference.	
2/19/2008	The TSTF submitted TSTF-446, Rev. 2, addressing the NRC's comments.	
2/25/2008	The NRC notified the TSTF by e-mail of the revised Schedule Milestones. The Notice for Comment is scheduled to be published on 3/25/2008. The Notice of Availability is scheduled to be published on 6/27/2008.	
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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-446, Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)</b>		
Date	Event	
4/15/2008	The NRC notified the TSTF by e-mail that the revised Notice for Comment scheduled date is 5/2/2008. The Notice of Availability date remains 6/27/2008.	
7/8/2008	The NRC notified by the TSTF by telephone that the NRC ITSBS is resolving comments from the NRC OGC. OGC has objections to issuing the Traveler under the CLIP.	
10/29/2008	The NRC notified the TSTF by letter that TSTF-446 will be processed following the Notice for Comment for TSTF-425: Scheduled Date for Notice for Comment: 12/31/2008 Scheduled Date for Notice of Availability: 3/30/2009	
1/30/2009	At the 1/30/2009 TSTF/NRC meeting, the TSTF provided comments on the Notice of Availability for TSTF-498 (the B&W CIV CT extension Traveler). NRC to revise the TSTF-446 Notice for Comment to reflect the TSTF comments.	
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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-446, Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)</b>		
Date	Event	
1/12/2009	Scheduled date for Notice for Comment is 2/7/2009	
2/9/2009	Scheduled date for Notice for Comment is 2/27/2009	
3/9/2009	Scheduled date for Notice for Comment is 3/31/2009	
4/6/2009	Scheduled date for Notice for Comment is 4/30/2009	
5/11/2009	Scheduled date for Notice for Comment is 5/30/2009.	

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### TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions (All) **High Priority**

Date	Event
9/27/2002	The NRC issued an RAI for Ginna related to a license amendment to revise the Safety Limits and instrument setpoints. The RAI questioned the methodology described ISA 67.04, Method 3, used by Ginna.
11/20/2002 - 8/13/2003	Several meetings and conference calls were held between the industry and the NRC discussing the use of ISA 67.04, Method 3.
10/8/2003	At a public meeting with the NRC, the NRC identified a secondary concern on the acceptable use of the Allowable Value to act as the LSSS as required by 10 CFR 50.36(c)(1)(ii)(A). The NRC considers the LSSS issue to be separate from the technical concern with Method 3. The NRC agreed to provide a written description of their concern (including basis) within approximately 30 days.

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TSTF

Technical Specifications Task Force  
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### TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions

Date	Event
6/17/2004	The NRC issues "Problem Statement on the Use of Instrumentation, Systems and Automation Society (ISA) Standard ISA 67.04 Part II. 'Methodology For The Determination Of Setpoints For Nuclear Safety-Related Instrumentation.' Method 3."
7/26/2004	At a public meeting with the NRC, the NRR Director of Engineering states that the NRC considers plants that use Method 3 to be safe but the issue of what constitutes compliance with the definition of LSSS in 10 CFR 50.36 remains. The NRC has not determined the next action to be taken.
7/27/2004 - 1/27/2006	The industry initiates technical studies. Public meetings are held and letters are exchanged between the NEI SMTP and the NRC to establish the NRC's position and an acceptable solution.
1/27/2006	Based on the results of the meetings and letters, the TSTF submits TSTF-493, Rev. 0, to the NRC.

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TSTF

Technical Specifications Task Force  
A Joint Owners Group Activity

## TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions

Date	Event
3/2/2006	The NRC grants the fee waiver for TSTF-493.
3/22/2006	The NRC provides RAIs on an electronic comment forum being tested by the NRC and the industry.
8/24/2006	The NRC publishes RIS 2006-17, "NRC Staff Position On The Requirements Of 10 CFR 50.36, 'Technical Specifications,' Regarding Limiting Safety System Settings During Periodic Testing And Calibration Of Instrument Channels." This reiterates the scope of functions to be addressed.
10/2/2006	The TSTF submits TSTF-493, Rev. 1, addressing the NRC's RAIs and additional items identified in discussions held with the NRC.

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TSTF

Technical Specifications Task Force  
A Joint Owners Group Activity

## TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions

Date	Event
11/8/2006	The NRC provides RAIs on TSTF-493, Rev. 1.
4/16/2007	The TSTF submits TSTF-493, Rev. 2.
5/24/2007	The NRC provides an Acceptance and Schedule Milestone letter. RAIs are scheduled to be provided by 8/1/2007. The Notice of Availability was scheduled to be published on 4/15/2008.
7/25/2007	The NRC provides RAIs and proposed Bases changes.
1/18/2008	The TSTF submits TSTF-493, Rev. 3. In letters dated 10/31/2007 and 12/19/2007, the TSTF extended the response date to provide time for additional industry review.

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TSTF		Technical Specifications Task Force <i>A Joint Owners Group Activity</i>
<b>TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions</b>		
Date	Event	
3/17/2008	The NRC provides an Acceptance and Schedule Milestone letter. The Notice for Comment is scheduled to be issued on 6/13/2008. The Notice of Availability is scheduled to be issued on 9/12/2008.	
6/10/2008	The NRC provided a letter to the TSTF that they will require additional time to review TSTF-493 and will provide new target dates in the August 2008 time frame.	
11/4/2008	The NRC responded to the TSTF's 1/18/08 RAI response, summarizing the NRC's issues and preferred resolution	
1/8/2009	At a meeting between the NRC and the Owners Group chairmen, an agreement was reached on the resolution of the outstanding issues associated with TSTF-493.	
2/23/2009	The TSTF responded to the NRC's 11/4/08 letter on TSTF-493 scope confirming the agreements reached at the 1/8/2009 meeting.	
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TSTF		Technical Specifications Task Force <i>A Joint Owners Group Activity</i>
<b>TSTF-493, Clarify Application of Setpoint Methodology for LSSS Functions</b>		
Date	Event	
3/9/2009	NRC responded by letter to the TSTF accepting the proposed approach to resolve TSTF-493.	
7/31/2009	TSTF to submit TSTF-493, Rev. 4. The TSTF and NRC have met multiple times and exchanged drafts to reach agreement on the implementation of the proposed approach.	
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TSTF

Technical Specifications Task Force  
A Joint Owners Group Activity

### TSTF-500, DC Electrical Rewrite - Update to TSTF-360 (All) High Priority - 2009 Opportunity

Date	Event
12/18/2000	The NRC approves TSTF-360, "DC Electrical Rewrite."
4/11/2006	The NRC provides a letter to the TSTF describing their concerns with TSTF-360. The TSTF requested the letter because of difficulties experienced by licensees during plant-specific requests of TSTF-360.
7/12/2006	A public meeting with the NRC was held to discuss the NRC's concerns and the proposed remedies.
12/19/2006	The NRC approves the LaSalle TSTF-360 adoption amendment. At the recommendation of the NRC, the TSTF utilized the LaSalle Safety Evaluation as the basis for developing TSTF-500.

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### TSTF-500, DC Electrical Rewrite - Update to TSTF-360

Date	Event
8/31/2007	The TSTF submits TSTF-500, Rev. 0.
10/1/2007	The NRC denies the TSTF request for a review fee exemption for TSTF-500.
10/29/2007	The NRC provides a letter accepting TSTF-500 but halting their review pending acceptance of review fees by the Industry.
10/31/2007	The TSTF provides a letter to the NRC accepting review fees for TSTF-500.

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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-500, DC Electrical Rewrite - Update to TSTF-360</b>		
Date	Event	
3/6/2008	The NRC provided Schedule Milestones by e-mail. RAIs are scheduled to be provided by 04/15/2008. The Notice for Comment is scheduled to be published on 08/15/2008. The Notice of Availability is scheduled to be published on 11/15/2008.	
3/11/2008	Following discussions with the NRC, the TSTF provided a draft Model Application for TSTF-500.	
6/4/2008	The NRC provided RAIs on TSTF-500.	
8/18/2008	TSTF provides responses to the TSTF-500 RAIs.	
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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-500, DC Electrical Rewrite - Update to TSTF-360</b>		
Date	Event	
9/11/2008	TSTF and NRC met to discuss NRC questions.	
11/5/2008	TSTF-500, Rev. 1, submitted.	
1/12/2009	Scheduled date for Notice for Comment is 1/26/2009	
2/9/2009	Scheduled date for Notice for Comment is 2/26/2009	
3/9/2009	Scheduled date for Notice for Comment is 4/1/2009	
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TSTF		Technical Specifications Task Force <i>A Joint Owners Group Activity</i>
<b>TSTF-500, DC Electrical Rewrite - Update to TSTF-360</b>		
Date	Event	
4/1/2009	NRC informed the TSTF that a revision to TSTF-500 will be required to reference IEEE-450-2002 and RG 1.129, Rev. 2.	
5/1/2009	A final draft of the proposed TSTF-500 program is provided to NRC following exchange of several drafts.	
Awaiting NRC response	Following feedback from NRC on acceptability of the proposed Program, TSTF to submit a revision to TSTF-500.	

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TSTF		Technical Specifications Task Force <i>A Joint Owners Group Activity</i>
<b>TSTF-501, Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control</b>		
<b>Medium Priority - 2009 Opportunity</b>		
Date	Event	
7/20/2007	The TSTF submits TSTF-501.	
9/24/2007	The NRC provides an Acceptance and Schedule Milestone letter. RAIs are scheduled to be provided on 11/20/2007. The Notice of Availability is scheduled to be published on 7/18/2008.	
12/13/2007	The NRC provides an RAI on TSTF-501.	
3/6/2008	The TSTF responds to the NRC's RAI.	

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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-501, Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control</b>		
Date	Event	
3/6/2008	Following discussions with the industry and the NRC, the TSTF submits a letter to the NRC requesting a full or partial fee exemption for TSTF-501.	
4/10/2008	The NRC denies the TSTF's fee exemption request.	
5/5/2008	The NRC provided a second RAI and revised Schedule Milestones. The Notice for Comment is scheduled to be published on 10/1/2008. The Notice of Availability is scheduled to be published on 12/3/2008.	
9/17/2008	TSTF responded to the NRC's RAI.	
12/23/2008	In a teleconference to address NRC questions, TSTF agreed to submit a revision to TSTF-501 that expanded the Bases.	
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TSTF		Technical Specifications Task Force A Joint Owners Group Activity
<b>TSTF-501, Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control</b>		
Date	Event	
2/20/2009	TSTF-501, Rev. 1, submitted to NRC.	
3/9/2009	Scheduled date for Notice for Comment is 3/31/2009	
4/6/2009	Scheduled date for Notice for Comment is 4/30/2009	
5/8/2009	Scheduled date for Notice for Comment is 5/30/2009	

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TSTF

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## TSTF-507, CLIP Traveler to Increase Standardization

### Low Priority

Date	Event
7/3/2008	The TSTF submitted TSTF-507, Rev. 0.
12/23/2008	The NRC stated they would send a letter to the TSTF detailing their concerns with the scope of the Traveler.
5/8/2009	NRC stated that the letter had not been started.

TSTF will withdraw TSTF-507.  
 TSTF requests that NRC close the TAC for this Traveler.  
 TSTF requests that NRC informally (verbal, e-mail) provide the list of Travelers in TSTF-507 that would be expensive to include. May request a meeting to discuss a future submittal.

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TSTF

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## TSTF-508, Revise Control Room Habitability Actions to Address Lessons Learned from TSTF-448 Implementation

### Medium Priority

Date	Event
7/3/2008	The TSTF submitted TSTF-508, Rev. 0.
10/7/2008	NRC provided acceptance and schedule letter dated October 7, 2008. Scheduled date for RIAs: 11/17/2008 Scheduled date for Notice for Comment: 4/10/2009 Scheduled date for Notice of Availability: 7/9/2009
11/19/2008	NRC informed TSTF that there were no RAIs on TSTF-508.
2/26/2009	In a conference call requested by NRC to discuss TSTF-508, the NRC questioned the basis for applicability of the change to shutdown conditions. NRC to send a written RAI.
4/17/2009	NRC provided an RAI on TSTF-508.

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**TSTF** Technical Specifications Task Force  
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**TSTF-508, Revise Control Room Habitability Actions to  
Address Lessons Learned from TSTF-448 Implementation**

Date	Event
6/30/2009	TSTF scheduled to respond to NRC RAI and provide a revised Traveler by 6/30/2009.

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**TSTF** Technical Specifications Task Force  
A Joint Owners Group Activity

**TSTF-510, Revision to Steam Generator Program Inspection  
Frequencies and Tube Sample Selection**

**Medium Priority**

Date	Event
3/26/2009	The TSTF submitted TSTF-510, Rev. 0, and a request for waiver of review fees.
5/8/2009	Review on hold pending a decision on fee waiver. NRC stated that they had not yet processed the fee waiver request.

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TSTF		Technical Specifications Task Force <i>A Joint Owners Group Activity</i>
<b>TSTF-512, Revise SR 3.0.3 to Address SRs that Cannot be Performed or are Not Met</b>		
<b>High Priority</b>		
Date	Event	
10/14/2008	The TSTF submitted TSTF-512, Rev. 0.	
5/1/2009	NRC provided a letter to the TSTF stating that there was insufficient information to support review of TSTF-512.	
12/18/2009	TSTF will revise and resubmit TSTF-512 by the end of 2009 to provide the requested additional justification for the issue of SRs that have never been performed and SRs that cannot be performed within the specified Frequency.	
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TSTF		Technical Specifications Task Force <i>A Joint Owners Group Activity</i>
<b>TSTF-513, Revise PWR Operability Requirements and Actions for RCS Leakage Instrumentation</b>		
<b>Medium Priority - 2009 Opportunity</b>		
Date	Event	
11/14/2009	The TSTF submitted TSTF-513, Rev. 0	
1/12/2009	The NRC requested that the TSTF expand the TSTF-513 Bases to clarify the Operability requirements.	
2/18/2009	The TSTF submitted TSTF-513, Revision 1, and TSTF-514, Revision 0, and a fee exemption request for TSTF-513 and TSTF-514.	
3/27/2009	The NRC grants the fee waiver for TSTF-513 and TSTF-513.	
5/6/2009	The NRC transmitted an RAI on TSTF-513.	
(continued)		
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<b>TSTF</b>		<b>Technical Specifications Task Force</b> <i>A Joint Owners Group Activity</i>
<b>TSTF-513, Revise PWR Operability Requirements and Actions for RCS Leakage Instrumentation</b>		
Date	Event	
5/28/2009	Teleconference between the NRC and TSTF to clarify the RAIs.	
6/30/2009	TSTF scheduled to submit the RAI response and TSTF-513, Rev. 2, by 6/30/2009. (Date dependent on receipt of the TSTF-514 RAI.)	

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<b>TSTF</b>		<b>Technical Specifications Task Force</b> <i>A Joint Owners Group Activity</i>
<b>TSTF-514, Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation</b> <b>Medium Priority - 2009 Opportunity</b>		
Date	Event	
2/18/2009	The TSTF submitted TSTF-513, Revision 1, and TSTF-514, Revision 0, and a fee exemption request for TSTF-513 and TSTF-514.	
3/27/2009	The NRC grants the fee waiver for TSTF-513 and TSTF-513.	
5/8/2009	NRC preparing an RAI on TSTF-514. Scheduled to be sent mid-May, 2009.	

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Date	Event
1/20/2009	The TSTF submitted TSTF-515, Rev. 0.
5/8/2009	The NRC requested a teleconference to discuss TSTF-515. NRC to provide nature of questions to facilitate arrangement of call.
Pending	A teleconference will be arranged once the NRC informs the TSTF of the nature of the questions.

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Date	Event
<p data-bbox="672 1402 950 1451"><b>CLIP Status</b></p>	

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## CLIP Survey

- TSTF to update the CLIP adoption status in the third Quarter of 2009 and plan to update annually thereafter.
- Will share results with NRC at the first meeting of each year.

(continued)

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## Status of NRC letter clarifying RIS 2000-06

- TSTF withdraws request for NRC to provide a letter.

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## Issues with Previously Approved Travelers

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### RITSTF Initiative 1 Travelers (TSTFs 423-A, 422-A, 431)

- RITSTF Initiative 1 Traveler on hold since March 2008.
- Exclusion of primary containment from TSTF-423 raised by NRC at 9/11/2008 TSTF/NRC meeting.
  - NRC agreed to send letter to TSTF and BWROG on from TSTF-423 at 9/30/2008 meeting.
  - **Status: Letter to TSTF received 5/5/09. Letter to BWROG pending. ETA?**
- RG 1.177, Tier 2 requirements not required to be in TS discussed at 9/11/2008 TSTF/NRC meeting.
  - NRC agreed to send letter to TSTF responding to the TSTF white paper documenting that Tier 2 requirements are not required to be in TS TSTF-423 at 9/30/2008 meeting.
  - **Status: Letter from NRC pending. ETA?**
- Applicability of LCO 3.0.4.a to Modified End States discussed at 9/11/2008 TSTF/NRC meeting.
  - Follow-up meetings on 9/30/2008, 1/8/2009, and 1/30/2009.
  - NRC agreed to send a letter to the TSTF requesting Traveler revision on 1/30/2009.
  - **Status: Letter from NRC pending. ETA?**

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**TSTF**

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## TSTF-490-A, Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec

- Approved by NRC on 3/15/07.
- Approved for ANO Unit 2, Millstone Units 2 and 3, Point Beach
- Approved prior to CLIP for Callaway, Wolf Creek, Comanche Peak, and Diablo Canyon
- At 1/30/2009 TSTF/NRC meeting, NRC stated that the model application and/or SE referred to a September 27, 2006 document that is not public. The accession number is ML062700612. NRC was going to make document public or reissue FRN.
  - **Status of action?**
- We understand that the current issue is whether multiple dose conversion factors may be referenced in the Dose Equivalent I-131 Definition.
- Are there any other issues?

(continued)

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**TSTF**

**From TSTF-490**

**DOSE EQUIVALENT I-131** DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP-30, Supplement to Part 1, page 192-212, table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity". DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I-131, I-132, I-133, I-134, and I-135 actually present. The determination of DOSE EQUIVALENT I-131 shall be performed using

**Reviewer's Note**

The first set of thyroid dose conversion factors shall be used for plants licensed to 10 CFR 100.11. The following Committed Dose Equivalent (CDE) or Committed Effective Dose Equivalent (CEDE) conversion factors shall be used for plants licensed to 10 CFR 50.67.

---

Thyroid dose conversion factors from:

- a. Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or
- b. Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or
- c. ICRP-30, 1979, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity," or
- d. Table 2.1 of EPA Federal Guidance Report No. 11, 1988, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion."

**OR**

Committed Dose Equivalent (CDE) or Committed Effective Dose Equivalent (CEDE) dose conversion factors from Table 2.1 of EPA Federal Guidance Report No. 11.

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**DOSE EQUIVALENT XE-133** DOSE EQUIVALENT XE-133 shall be that concentration of Xe-133 (microcuries per gram) that alone would produce the same acute dose to the whole body as the combined activities of noble gas nuclides Kr-85m, Kr-85, Kr-87, Kr-88, Xe-133m, Xe-133m, Xe-133, Xe-135m, Xe-135, and Xe-138 actually present. If a specific noble gas nuclide is not detected, it should be assumed to be present at the minimum detectable activity. The determination of DOSE EQUIVALENT XE-133 shall be performed using effective dose conversion factors for air submersion listed in Table III.1 of EPA Federal Guidance Report No. 12, 1963, "External Exposure to Radionuclides in Air, Water, and Soil," or the average gamma disintegration energies as provided in ICRP Publication 38, "Radionuclide Transformations" or 6@air source.

Expanded on next slide

TSTF	<b>Technical Specifications Task Force</b> <i>A Joint Owners Group Activity</i>
	<u>----- Reviewer's Note -----</u>
	<p>The first set of thyroid dose conversion factors shall be used for plants licensed to 10 CFR 100.11. The following Committed Dose Equivalent (CDE) or Committed Effective Dose Equivalent (CEDE) conversion factors shall be used for plants licensed to 10 CFR 50.67.</p>
	<p>[thyroid dose conversion factors from:</p>
	<p>a. <u>Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or</u></p>
	<p>b. <u>Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or</u></p>
	<p>c. <u>ICRP-30, 1979, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity," or</u></p>
	<p>d. <u>Table 2.1 of EPA Federal Guidance Report No. 11, 1988, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion."</u></p>
	<p>OR</p>
	<p><u>Committed Dose Equivalent (CDE) or Committed Effective Dose Equivalent (CEDE) dose conversion factors from Table 2.1 of EPA Federal Guidance Report No. 11.]</u></p>
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TSTF	<b>Technical Specifications Task Force</b> <i>A Joint Owners Group Activity</i>
<b>TSTF-439-A, Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO</b>	
<ul style="list-style-type: none"> <li>• TSTF-439 was approved by the NRC in a letter dated 1/11/2006.</li> <li>• TSTF-439 eliminated "second Completion Times" from several specifications to facilitate risk-informed Completion Times. <ul style="list-style-type: none"> <li>– These second Completion Times were added to the ISTS due to concerns over abuse of multiple Condition entry. These concerns are now addressed by availability targets in the Maintenance Rule.</li> </ul> </li> <li>• TSTF-439 was the result of over 4 years of discussion with the NRC. <ul style="list-style-type: none"> <li>– The NRC's approval of TSTF-439 stated, "The NRC Staff concludes that multiple continuous entries into Conditions, without meeting the LCO, is acceptable because these practices will be controlled by licensee's configuration risk management programs, which were implemented to meet the requirements of the maintenance rule to assess and manage risk, and controlled by the Use and Application convention discussed in Section 1.3 of the Technical Specifications. <u>The TS controls, coupled with the licensees' configuration risk management programs, provide adequate assurance against inappropriate use of combinations of Conditions that result in a single contiguous occurrence of failing to meet the LCO.</u>"</li> </ul> </li> </ul>	
(continued)	
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### TSTF-439-A, Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO

- TSTF-439 has been approved for several plants, including Crystal River, Monticello, Millstone 2, Fermi, Callaway, and Comanche Peak
- Only Comanche Peak was required to make an additional commitment in order to adopt TSTF-439. Ft. Calhoun was requested to make a similar commitment.
- "There shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO for TS 3.7.5\*Auxiliary Feedwater (AFW) System, TS 3.8.1, A.C. Sources - Operating, and TS 3.8.9, Distribution Systems - Operating. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended. The administrative controls will ensure that Completion Time is NOT extended beyond the additive Completion Times of the two (2) Required Actions for restoration of OPERABILITY unless a risk evaluation is performed. If Unit Operation within an LCO will exceed the maximum Completion Time, then either the shutdown Condition within the LCO should be entered OR a risk evaluation shall be performed and the risk impact managed under the Configuration Risk Management Program (CRMP)."
- Would like to discuss why the requirements for adopting TSTF-439 are changing so that we can advise licensees on the expectations.

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### TSTF-400, "Clarify SR on Bypass of DG Automatic Trips"

- TSTF-400 was originally a Bases-only Traveler that clarified that SR 3.8.1.13 only verifies that non-critical trips are bypassed (and not that the critical trips are not bypassed). Justification based on consistency with Reg Guide 1.9.
- NRC approved Revision 0 and incorporated it into Rev. 3 of the ISTS.
- NRC subsequently requested that the SR be revised so that it is clear. TSTF agreed and TSTF-400, Rev. 1, was approved on 11/13/2004 and incorporated it into ISTS Revision 3.1.

(continued)

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<p><b>TSTF</b></p>	<p>SR 3.8.1.13</p> <p style="text-align: center;">- NOTE -</p> <p>[ This Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. ]</p> <p>Verify each DG's automatic trips are bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF actuation signal] except:</p> <ul style="list-style-type: none"> <li>a. Engine overspeed,</li> <li>b. Generator differential current,</li> <li>[ c. Low lube oil pressure,</li> <li>d. High crankcase pressure, and</li> <li>e. Start failure relay. ]</li> </ul>	<p>[18] months</p>	<p>Technical Specifications Task Force A Joint Owners Group Activity</p>
	<p>After TSTF-400</p>		
<p>(continued)</p>	<p>SR 3.8.1.13</p> <p style="text-align: center;">-----NOTE-----</p> <p>[ This Surveillance shall not normally be performed in MODE 1 or 2. However, this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. ]</p> <p>Verify each DG's noncritical automatic trips are bypassed on [actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ESF actuation signal].</p>	<p>[18] months</p>	

<p><b>TSTF</b></p>	<p>Technical Specifications Task Force A Joint Owners Group Activity</p>
<p><b>TSTF-400, "Clarify SR on Bypass of DG Automatic Trips"</b></p>	
<ul style="list-style-type: none"> <li>• In several recent amendments, the NRC has requested licensees to commit that they will continue to test critical and noncritical EDG trips periodically per the maintenance program.</li> <li>• Catawba &amp; McGuire included a Bases statement. Grand Gulf made a commitment. Other plants have received similar RAIs.</li> </ul>	

TSTF

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TSTF-475, Control Rod Notch Testing Frequency and SRM Insert  
Control Rod Action

- At the 9/11/2008 TSTF/NRC meeting, NRC stated that would revise and notice TSTF-475 to correct the NSHC.
- Does the NRC still plan to change the Notice?

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## Technical Issues

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## RG 1.174 Tier 2 Requirements

- Discussed under Initiative 1 Travelers.

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## Development of ISTS Rev. 4

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## ISTS Revision 4 Development

- ISTS Rev. 0 - September 1992
- ISTS Rev. 1 - April 1995
- ISTS Rev. 2 - April 2001
- ISTS Rev. 2.1 - June 2001
- ISTS Retyped by TSTF into MS Word format
- ISTS Rev. 3 - April 2004
- ISTS Rev. 3.1 - December 2005

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## ISTS Revision 4 Development

- Development of ISTS Rev. 0 - 2.1 (1992-2001):
  - NRC and TSTF agreed on Travelers to be incorporated.
  - NRC typed revised NUREGs.
  - Repeat the following
    - NRC sends draft NUREGS to TSTF for review
    - Industry reviewed the Traveler incorporation and provided comments
    - NRC incorporated comments and provided revised drafts
  - NRC issues revised NUREGs

(continued)

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## ISTS Revision 4 Development

- The industry performed four rounds of review and comment on the draft Rev. 2. When issued, over 500 errors were discovered.
- As a result, prior to creation of ISTS Rev. 3, the TSTF and NRC agreed in 2002:
  - The TSTF would retype the ISTS NUREGs into MS Word format at our cost.
  - The TSTF would create future revisions of the ISTS which the NRC would proof and review (track changes and clean copies)
  - The TSTF would provide Acrobat copies of the NUREGs to the NRC for publication.
- This process was followed successfully for Rev. 3.0 and 3.1 of the ISTS and both Owners Groups had budgeted funds to develop Rev. 4 using this process in 2009.

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## ISTS Revision 4 Development

- The TSTF wants to work with the NRC to develop, review, and publish Rev. 4
- We would like review with the NRC the "lessons learned" from earlier revisions
- We want to ensure that Rev. 4 changes are consistent with the Writer's Guide
- Want to include TSTF-493 and TSTF-425 in Rev. 4
- TSTF has Word files for all approved Travelers

(continued)

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## Risk Informed ISTS NUREG

- NRC suggestion for Risk Informed (e.g., Initiative 4b and 5b) ISTS NUREGs and non-risk informed NUREGs
- TSTF does not believe this is beneficial.
- Both TSTF-425 (5b) and TSTF-505 (4b) are written showing both existing and revised requirements in brackets (TS & Bases)
- Survey indicates that most plants will adopt TSTF-425 and TSTF-505 in the next few years

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TSTF-425 Example

SURVEILLANCE REQUIREMENTS		
	SURVEILLANCE	FREQUENCY
SR 3.1.1.1	Verify SDM is within the limits specified in the COLR.	[ 24 hours OR In accordance with the Surveillance Frequency Control Program ]

TSTF-505 Example

ACTIONS		
CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days [ OR In accordance with the Risk Informed Completion Time Program ]

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## ISTS Revision 4 Development

- Correction of inconsistent Note locations in the ISTS
- Issue: When is a Note to the right of the designator and when above the designator?
  - See next slide
- Recommend TSTF creates a “T” Traveler which the NRC agrees to incorporate in Rev. 4.

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CONDITION	REQUIRED ACTION	COMPLETION TIME
----- Note ----- Only applicable on Thursdays. ----- A. One or more valves inoperable.	----- Note ----- Not required to be performed if you don't feel like it. ----- A.1 Restore valve to OPERABLE status.	4 hours

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. ----- Note ----- Only applicable on Thursdays. ----- One or more valves inoperable.	A.1 ----- Note ----- Not required to be performed if you don't feel like it. ----- Restore valve to OPERABLE status.	4 hours

TSTF

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## Future Planning

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TSTF

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## Follow-Up Actions From Workshop

- TSTF Actions
  - Ultrasonic flow meter “T” Traveler – B&W plants will not pursue generically.
  - TSTF conveyed to both Owners Groups the NRC expectation that the LCO Bases clearly explain system Operability and use terminology consistent with the Specification.
  - PWROG and BWROG agreed to support a Traveler to clarify LCO 3.0.4.a, LCO 3.0.5, and Operational Convenience.
  - PWROG and BWROG agreed to review Required Actions to determine if the NRC position on Required Action completion has unintended consequences.
- NRC Actions
  - Withdrawal of Palisades TIA to prevent future confusion. Status?

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## Travelers Under Development

- TSTF-505, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b"
  - Reviewed by Owners Groups, resolving comments
  - Submit this summer
- BWROG Initiative 4a & 6 Topical Reports and Travelers
  - Waiting for resolution of CE Initiative 6 issues
  - Submit this summer

(continued)

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## Travelers Under Development

- Traveler to revise ventilation system Surveillance Requirements to operate with heaters for 10 hours per month
  - Based on latest version of Reg Guide 1.54
  - Submit this summer

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## Travelers Under Development

- TSTF-517, "Allowance for Non-TS Cooling / Ventilation Systems Degradation on Support System Operability"
  - Very similar to TSTF-427, which pertains to barriers that support TS systems
  - Submit this summer

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## Next Meeting

- TSTF - November 4 (Wednesday - day after election day)
- TSTF/NRC - November 5 (Thursday)

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