

March 23, 2011

MEMORANDUM TO: John R. Jolicoeur, Chief  
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Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager **/RA/**  
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE FEBRUARY 9, 2011, U.S. NUCLEAR  
REGULATORY COMMISSION (NRC) MEETING WITH THE  
TECHNICAL SPECIFICATIONS TASK FORCE

On February 9, 2011, the NRC staff met with the Technical Specifications (TS) Task Force (TSTF) to discuss technical issues and administrative processes related to TSTF Travelers. The meeting was held at NRC offices in One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852. A list of the meeting attendees is enclosed. The meeting notice and agenda, dated January 28, 2011, are available in the Agencywide Documents Access and Management System (ADAMS) at Package Accession No. ML110280260.

The NRC staff and TSTF representatives discussed the topics as presented on the agenda. These topics included: issues related to completing Revision 4 of Improved Standard TS; the status of the Travelers currently under NRC review; issues related to previously approved Travelers; and other technical issues facing the industry that are generically related to TSs.

Formal presentations were not given at this meeting; rather, the meeting was conducted in an open discussion format for each item on the agenda. For selected agenda items, the NRC staff or TSTF representatives provided handouts to facilitate discussion and/or serve as an information exchange. These handouts are listed below and are publicly available in ADAMS.

- Active Traveler Review Status Report (ADAMS Accession No. ML110470104).
- TSTF-505, Proposed Table for LCO 3.0X-1 and TS 5.5 program (ADAMS Accession No. ML110380311).
- TSTF-426, Proposed changes to TS (ADAMS Accession No. ML110420530).

Summary of NRC plan to resolve issues with Travelers TSTF-363, TSTF-408, and TSTF-419

Mr. Benjamin Parks of the NRC commented that the NRC staff considered the information presented in the TSTF's January 28, 2010, white paper (ADAMS Accession No. ML110470105). Going forward the NRC staff wants methodology revision numbers and dates provided in the TS for plants that have not implemented TSTF-363. The NRC staff cannot ensure that a given methodology is implemented properly (i.e., cannot be sure if licensees are applying the Safety Analysis correctly) if the revision numbers and dates are not in TS and reviewed via a license

amendment request (LAR). The NRC staff has not come to a final decision on how to handle plants that have already implemented TSTF-363. This will render 363 obsolete; therefore, the NRC staff plans to eliminate it in the next Standard TS (STS) revision. TSTF-408 and TSTF-419 would need to be revised to include methodology revision numbers and dates in the TS.

Mr. Brian Mann of the TSTF commented that withdrawing approval of a traveler and implementing that change in the STS is out of process. In the past the TSTF has provided another traveler removing the changes implemented by the previous traveler. Mr. Elliott of the NRC suggested that the NRC staff write a letter to the TSTF, withdrawing our approval of TSTF-363 and providing the option of the NRC staff either making the change to the STS or having the TSTF provide another traveler. All agreed that would be the best course.

Mr. Tony Browning of the TSTF asked if withdrawing TSTF-363 would be necessary if there were more rigor in the core operating limits reports (COLRs) or other avenue to provide the NRC staff with the necessary information? Mr. Parks of the NRC explained that the NRC staff had evaluated developing durable guidance for this, but could not justify resources for it. The NRC staff has folded this into internal knowledge management efforts in order to educate staff to apply same level rigor of reviews. Mr. Parks commented that licensees are doing a good job in answering questions asked during LAR review of TSTF-408 and TSTF-419. He commented that the NRC staff is taking action to improve review practices. Mr. Browning commented that since there is no standard format for COLRs, the industry may write a best practices document.

Mr. Parks commented that the NRC would like to have future dialogue about actions taken on both sides. Ms. Michelle Honcharik of the NRC asked when the industry would be ready to meet to discuss best practices. The TSTF members commented that the earliest they could meet would be June of 2011.

Mr. Elliott commented that the bottom line is NRC will not review new LARs to remove methodology revision numbers and dates. Licensees can still apply for Travelers TSTF-408 and TSTF-419, but they need to provide the methodology revision numbers and dates.

Mr. Theodore (Bob) Tjader of NRC reminded everyone there is a rush to resolve this, because it impacts the TS of new reactors too.

Action items:

- NRC to decide how to handle plants that have already implemented TSTF-363.
- NRC to submit a letter to the TSTF documenting our withdraw of TSTF-363 and intent to remove it from the STS, unless the TSTF provides a Traveler to remove it from the STS.
- NRC/TSTF to meet again in June 2011 to discuss path forward and COLR best practices.

Summary of TSTF-501, relocate stored fuel oil and lube oil volume values to licensee control

Ms. Kristy Bucholtz of the NRC explained that the NRC staff plans to use the Palisades LAR (once approved) as boilerplate. The NRC SE of it is targeted for August 2011. If possible, the NRC will simply revise the existing model application and SE (hereafter referred to as "models") to reflect what was approved in the Palisades LAR. If not feasible, then the NRC staff will develop a second set of models. Mr. Mann of the TSTF commented that the TSTF-501 model

SE stated that if a licensee is not doing 7 days, then the application is not a CLIP and goes to technical staff for full review. Revision of the models to reflect the Palisades LAR will avoid full review for future plants.

The TSTF members questioned if licensees can include the day tank in LARs to adopt TSTF-501, sighting the Columbia LAR and still have it processed as CLIP? Ms. Bucholtz said she will review the Columbia LAR, talk to the technical staff involved, and then get back to TSTF. She also commented that if possible the NRC staff will add this option to the revised models.

Action items:

- NRC to check on viability of inclusion of Day Tank option in revised models.
- NRC staff to revise the models (or create a second set of models) once the Palisades LAR is approved.

Summary of applicability of TSTF-513 & TSTF-514

Mr. Elliott explained that if a licensee does not have any confusion or conflict in its licensing basis, then it does not need to submit an LAR to adopt TSTF-513 or TSTF-514. If its current licensing basis is valid and accurate and the detectors work for what they are licensed and the licensee is not committed to RG 1.45 – then no – it does not need to submit an LAR to adopt TSTF-513/TSTF-514. If a licensee knows it cannot meet its licensing basis because the detector does not have the source term available, then it does need to come in under TSTF-5134/TSTF-514. Mr. Mann of the TSTF raised another question: if the TS are okay, but basis are not clear, what should a licensee do? Can a licensee change the basis under the basis control program? Mr. Elliott recommended that the licensee submit an LAR to adopt TSTF-513 or TSTF-514.

Action items:

- None

Summary of status of active travelers under review

Due to time constraints only select travelers were discussed.

TSTF-500. The TSTF members indicated this traveler is the highest priority for industry. The NRC staff indicated they are targeting issuance of the Notice of Availability by the end of April.

TSTF-525. The NRC staff provided feedback on the reasons for non-acceptance of TSTF-525 and explained that if the industry wants to go beyond what was approved in the WCAP, then they should revise the TR. TSTF does not plan to withdraw the traveler; they want the non-acceptance letter from NRC for documentation.

TSTF-426. The NRC staff provided feedback on proposed TSTF-426, “Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b & 6c” format. The NRC staff had a handout of the proposal (ADAMS Accession No. ML110420530). Mr. Schulten of the NRC explained that he tried to craft TS wording to maintain basis for the TR approval. He wanted to avoid wording of “operational convenience” in TS. Mr. Mann of the TSTF commented that it

should not be a NOTE, since it is not normal use of NOTES. Several options were discussed and finally both parties agreed to use the following Conditions Note wording: "Not applicable when 2nd [ICS] train is intentionally made inoperable." Mr. Mann will research the use of "made" versus "rendered" and confirm if "made" is the correct word. He will also prepare a Revision to TSTF-426 to reflect agreed upon wording. TSTF-426 also needs to be revised to reflect what was not approved in WCAP.

TSTF-505. The NRC staff provided feedback on proposed TSTF-505, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b" format. Ms. Bucholtz of the NRC handed out a revised (since the last meeting) proposed TS table and wording (ADAMS at Accession No. ML110380311). Ms. Bucholtz of the NRC explained that the NRC prefers a new 3.0-type LCO, in lieu of revising each individual TS. The NRC staff feels that the appropriate thing is to address loss of safety function in the LCO, then do not need to make changes to other TSs. This will save the industry money and NRC review time. The NRC staff wants a table in LCO, so operators do not have to jump between TS and program.

Mr. Stringfellow of the TSTF stated that he appreciates the NRC feedback, and wanted to understand what NRC's goal was with this approach. This is a HUGE change to the TS, gives industry more leeway, and will require a significant amount of training. Therefore, they want to make the presentation as simple as possible. They think that table and 3.0 concept is more complex than individual TS changes. They would rather have more burden on licensing (to mark up every TS), than with operator in control room.

Mr. Stringfellow of the TSTF commented that the industry feels it is clearer to have the changes in each individual TS, so there is no confusion as to whether or not they are still in the original TS. The majority opinion is that it is better to stay in the original LCO.

Mr. Mann commented that the NRC proposal would be an exception to normal TS usage rules, which is especially difficult for things that are used infrequently. In the originally proposed TSTF-505, the TS usage rules are the same. Also, the original proposed TSTF-505 is similar to the STP format, which has been in use for 3-1/2 years with no problems.

Mr. Stringfellow of the TSTF explained that the industry feels strongly about the presentation and making it as friendly to the operator as possible. If it is made too complex in an effort to be succinct and reduce impact on the NUREG, then licensees will not embrace it, which will slow down implementation.

Mr. Mann commented that there are historical examples of using the 3.0-type items for other issues and they have not gone well. They were adopted slowly and were found to be confusing.

After hearing the industry's arguments that a 3.0-type specification is more difficult for the plant operators, the NRC staff agreed to go back to original 505 change. However, the NRC staff wants to be sure of the following items:

- 1) Program needs to have the plant be in Mode 1 or 2.
- 2) The draft write up is okay except for each condition for loss of safety functions – there should be a note similar to what's been agreed to for TSTF-426 (to be sure the licensee can't voluntarily make second train inoperable). Mr. Elliott commented that they could do this or delete "1 hour" and add IAW the RIT and have clarification in the program.
- 3) Don't want any Required Actions deleted.

A TSTF member asked what will be the NRC position on Notice of Enforcement Discretions (NOEDs) and emergency TS changes after TSTF-505 is approved? Mr. Elliott of the NRC commented that the NRC has no intention of changing NOED policy.

TSTF-508. The NRC staff discussed content of additional RAIs to be submitted, which related to the three RAI responses.

Issue 1: Limits on chemical hazards. Since some plants *do* have chemical limits, the TS wording should keep the reference to chemical exposures, and change only smoke wording. Mr. Jack Stringfellow of the TSTF asked if it would be bracketed, since most plants do not have chemical limits. Ms. Honcharik of the NRC suggested leaving limits wording in the TS and have in the TS Bases an explanation that exclusion of chemical hazards is an acceptable means of meeting the limits. Everyone agreed.

Issue 2: Fuel movement in Modes 5 and 6. Mr. Mark Blumberg of the NRC commented that the simplest thing to do is stop fuel movement. Condition B should not be expanded to Modes 5 and 6, because breathing apparatus is a last resort. He explained that breathing apparatus is okay if the alternative is shutdown, but it is not okay otherwise, because breathing apparatus has risks. Mr. Blumberg cited Title 10 of the *Code of Federal Regulations* Sections 20.171 and 20.172.

Issue 3: 18-month assessments. Mr. Hamm of the NRC summarized the NRC thought process and new wording. Mr. Blumberg of the NRC commented that the 18-month delta P test was replacing a surveillance requirement (SR). It was clarified that the following tests/assessments are to occur: tracer gas test every 6 years, every 3 years perform an assessment of the CRE boundary in accordance with Regulatory Guide 1.197, every 18 months perform delta P testing. Even though the 18-month delta P test was taken out of the SRs, licensees still have to do the test.

Mr. Matthew Hamm of the NRC commented that the staff's explanation will be formalized in the RAI letter. The NRC staff plans to provide a letter by end of February. Mr. Mann of the TSTF pointed out that it has been 15 months since the Notice for Comment was published and NRC staff is now changing position. The TSTF will consider and wait for letter, then decide whether to revise or withdraw the traveler.

Summary of update on discussions with Office of General Counsel (OGC) on excluding travelers and topical reports from the Congressional Review Act (CRA)

Ms. Honcharik of the NRC explained that all TSTF travelers will still be reviewed by NRC's Office of General Counsel (OGC) and they will determine if something can be excluded on a case-by-case basis. A traveler would only be excluded if it can be argued that it is a "rule of particular applicability." This has been interpreted to mean that the approval is necessary for a company to sell a specific product, and they would not be able to sell such product without NRC approval. Therefore, it is highly unlikely that a traveler would ever fall into this category. No other considerations matter; it does not matter if it is voluntary or non-major. There will never be specific criteria or an umbrella exclusion that can be easily applied to TSTFs. They will always be reviewed on a case-by-case basis by OGC.

#### Summary of discussion of development of STS Revision 4

Mr. Waig of the NRC explained that the staff expects to be done with the broad review in approximately 1-1/2 months. After the broad review, it will go to individual section owners for a detailed review, which will take about 2 months. Then a final review is done before going to ADM services, which takes a month and consists of a page by page check. Fortunately, the NRC staff member in ADM who reviewed Revision 3 is still at the NRC and will be handling the Revision 4 review. The NRC ADM staff handles the distribution to the Government Printing Office. Target date for Revision 4 issuance is June 2011.

It was asked if the revision needs to go through CRA review. Ms. Honcharik will check with OGC. Mr. Waig asked about documentation for several changes in Revision 4 that were not submitted as travelers. Mr. Mann of the TSTF commented that they will submit those "T" travelers on the docket.

#### Action items:

- Ms. Honcharik will check with OGC to find out if Revision 4 must go through the CRA process.
- TSTF will submit changes discussed as "T" travelers on the docket.

#### Summary of TS changes resulting from licensee spent fuel pool (SFP) criticality analysis

Mr. Elliott of the NRC commented that during the Pressurized Water Reactor Owners' Group (PWROG) meeting at Marco Island a concern was raised regarding the lengthy pages in TS (35 page TSs). Mr. Mann of the TSTF explained that plants have lengthy TS on allowed loading patterns, in some cases more pages in TS for this than they have on emergency core cooling system (ECCS) and diesel generators (DGs). Is there a more efficient way to do this? Mr. Kent Wood of the NRC clarified that these pages are in the design features section. Technical Specification 3.7 has 1 loading curve, with the requirements to comply with the loading curve(s) in the design features section. Mr. Mann of the TSTF commented that this is unusual, and not typically seen in TS. Mr. Stringfellow of the TSTF said that for 2012 this is a budget item to develop a program to address this issue. Mr. Wood of the NRC agreed that this has been going on for a long time. This level of detail in STS can have it incorporated by reference. He also agreed that this is not used to operate a plant. An operator does not use them on a daily bases. Mr. Wood also explained that this item is in the NRR action plan for SFP TS. Mr. Stringfellow commented that it sounds like both sides have a concept in mind as to what is appropriate and perhaps we can work together on this issue. Mr. Wood from the NRC agreed.

#### Summary of status of NRC actions related to the April 19, 2010, Clinton task interface agreement on Surveillance Requirement 3.0.3 application to the inservice testing (IST) program

With regards to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), Mr. Schulten of the NRC explained that the NRC staff has written up 2 code cases and taken them to the ASME OM Code Committee (the committee). It was determined that the 25 percent extension is not intended to be used repeatedly. If licensees exceed 25 percent extension, then they missed the SR. For a missed SR, the committee decided not to accept it as a separate code case. The committee thought missed IST tests could be better handled by the operability determination process.

Mr. Schulten also commented that the Performance and Testing Branch is updating NUREG-1482, which will be going back out for public comment in late spring. This update will take out all the references to TS and make it strictly an IST document. Mr. Schulten also noted that ITSB has plans to issue an enforcement guidance memorandum in the near term and some form of generic communication to address the SR 3.0.3 application to the IST.

Summary of TSTF-493 workshop, status of NRC & industry actions

Mr. Mann of the TSTF commented that they hope to have an action plan by March 1, 2011. Mr. Schulten said that he is concerned about losing traction and asked if they could encourage a lead plant submittal. Mr. Stringfellow of the TSTF commented that Vogtle plans to have an Option B submittal by end of the year. Mr. Schulten commented that the NRC reviewer mentioned Kewaunee as a lead plant, because they have quality data. Mr. Stringfellow of the TSTF said that they will follow up with Jerry Voss of the TSTF, talk to Kewaunee, and get back to NRC.

Action item:

- TSTF to inform NRC of lead plant submittal plans.

Summary of Status of TSTF feedback on DG-1244 (proposed Rev. 1 to RG 1.93) revising the definition of Operability for offsite sources

Mr. Waig of the NRC shared the TSTF comments with RES. NEI comments said we do not need the RG, because we have the STS. Mr. Waig also commented that he has not seen resolution of comments that he and fellow TS Branch members had to the draft RG. The RES reviewer is still working on it. Mr. Elliott of the NRC suggested that Mr. Waig follow-up again with RES reviewer and let him know if he needs to talk to the reviewers.

Future meetings for 2011 are tentatively planned for Thursdays, May 12 and August 11, and Wednesday, November 10.

Members of the public whom participated via teleconference are listed with the meeting attendees. No public meeting feedback forms were received.

Please direct any inquiries to me at 301-415-1774 or at [Michelle.Honcharik@nrc.gov](mailto:Michelle.Honcharik@nrc.gov).

Project No. 753

Enclosure:  
List of Attendees

cc w/encl: See next page

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**ADAMS Accession Nos:** Package: ML110380309

Meeting summary: ML110560630

Meeting notice and agenda: Package ML110280260

Meeting handouts: ML110420530, ML110380311, and ML110470104

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## Attendees at NRC/TSTF Meeting

February 9, 2011

<b>Name</b>	<b>Organization</b>
Michelle Honcharik	NRC/Office of Nuclear Reactor Regulation (NRR)/Division of Policy and Rulemaking (DPR)
Benjamin Parks	NRC/NRR/Division of Safety Systems (DSS)
Robert Elliott	NRC/NRR/Division of Inspection and Regional Support (DIRS)
Carl Schulten	NRC/NRR/DIRS
Ravi Grover	NRC/NRR/DIRS
Gerald Waig	NRC/NRR/DIRS
Dayna Dority	NRC/Office of New Reactors (NRO)
John Jolicoeur	NRC/NRR/DPR
Matthew Hamm	NRC/NRR/DIRS
Kristy Bucholtz	NRC/NRR/DIRS
Bob Tjader	NRC/NRO
Shaun Anderson	NRC/NRR/DIRS
Melana Singletary	NRC/NRR/DIRS
Andrew Howe	NRC/NRR/Division of Risk Assessment (DRA)
*Rossnyev Alvarado	NRC/NRR/Division of Engineering (DE)
Mark Blumberg	NRC/NRR/DRA
Kent Wood	NRC/NRR/Division of Safety Systems (DSS)
Laray Benton	NRC/NRR/DRA
Tony Browning	TSTF
Brian Mann	TSTF
Jack Stringfellow	TSTF
*Nancy Chapman	Bechtel Power Corporation

\*Participated via teleconference.

ENCLOSURE