

November 30, 2011

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

FROM: Michelle C. Honcharik, Senior Project Manager **/RA/**  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE NOVEMBER 17, 2011, U.S. NUCLEAR  
REGULATORY COMMISSION MEETING WITH THE TECHNICAL  
SPECIFICATIONS TASK FORCE REGARDING REVISION TO  
TRAVELER TSTF-523

On November 17, 2011, the U.S. Nuclear Regulatory Commission (NRC) staff met with members of the Technical Specifications (TS) Task Force (TSTF) regarding Traveler TSTF-523, "Generic Letter 2008-01, Managing Gas Accumulation." 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 dated October 24, 2011, is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML112940302.

Members of the TSTF provided the NRC with a sample of the proposed TS and TS Bases changes in advance of the meeting, which is available in ADAMS at Accession No. ML113220171. Members of the TSTF also gave a presentation during the meeting. The presentation is available in ADAMS at Accession No. ML113220164.

Mr. Jack Stringfellow, TSTF, reviewed background information and the basics of the surveillance frequency control program (SFCP). He noted that the proposed revision to TSTF-523 will not reference the Nuclear Energy Institute (NEI) Topical Report, NEI 09-10, "Guidelines for Effective Prevention and Management of System Gas Accumulation." However, information proposed to be included in the TS Bases with TSTF-523 is similar to some of the information contained in NEI 09-10.

Mr. Stringfellow reviewed the proposed changes to Westinghouse TS. Mr. Tony Browning, TSTF, discussed the proposed revisions to boiling water reactor (BWR)/4 plant TS. Mr. Browning noted that the changes will be similar in the BWR/6 TS.

Mr. Sheldon Stuchell, NRC, asked about completion times for required actions. Mr. Browning, TSTF, responded that they are not proposing to change the required actions. If the completion time was 72 hours before, it will still be 72 hours.

Mr. Stringfellow, TSTF, reviewed the proposed surveillance requirement (SR) wording changes, specifically, the use of "sufficiently filled with water." He stated that the principal is consistent

with the NRC staff proposal in the May 25, 2011, letter (ADAMS Accession No. ML111430832) and with what industry does today. The proposed phrasing in TS provides a nexus to system operability. He noted that the intent of wording in TS Bases is to be consistent with wording in NEI 09-10.

Mr. Stringfellow, TSTF, asked if the NRC staff had any questions/comments regarding the TS Bases wording. He commented that they tried to capture the essential elements of gas management. Mr. Robert Elliott, NRC, asked if there were any problems with TSTF-425 SFCP process being used in conjunction with gas accumulation. Mr. Browning, TSTF, answered that the TSTF-425 program works well with TSTF-523. Mr. Stringfellow, TSTF, commented that a lot of the issues particular to gas management are captured with the TSTF-425 program: if doing quarterly SRs and start seeing gas, then the licensee would “ratchet it” back; if they needed to shorten SRs because of failures, then that’s controlled by the licensees’ corrective action program. Even if they find gas, but are still operable (within limits) – the licensee would have to evaluate to see if they can wait until the next SR (i.e., if they do nothing, will it still pass the SR next time?).

Mr. Stuchell, NRC, asked when does the licensee perform the analysis to determine where they may have gas. The TSTF members replied that every plant has already done that analysis in response to the GL 2008-001. Ms. Jennifer Gall, NRC, asked the TSTF to confirm that the surveillance procedures will include the list of susceptible locations. The TSTF members answered – yes. Mr. Elliott, NRC, asked – what if they decide to change the list of susceptible locations? The TSTF members replied that the locations are in the surveillance procedures, which cannot be changed without a Title 10 of the *Code of Federal Regulation* 50.59 review.

Mr. Stuchell, NRC, asked about where “sufficiently filled with water” is defined. Mr. Stringfellow, TSTF, answered that a lot of analysis was done to determine what an acceptable void would be at a given location. Mr. Browning, TSTF, commented that the value/definition will be in the surveillance procedures. Mr. Stringfellow, TSTF, commented that licensees performed design reviews and made the determinations in response to GL 2008-001. Mr. Mann, TSTF, commented that the TS Bases state that if gas is found, the licensee has to be able to quantify it.

In answer to Mr. Elliott’s concern with respect to system operability if they find gas during a surveillance, Mr. Mann, TSTF, explained that if a licensee performs the surveillance and finds gas that exceeds the acceptance criteria, then the surveillance fails and the system is declared inoperable. The licensee can then perform an operability determination and if it passes – the SR is met and any entered actions can be exited.

Mr. Matthew Hamm, NRC, stated that some of the questions the proposed TS and TS Bases elicited are whether or not the language is really going to fix the problem, and whether or not it is inspectable. Can a licensee and inspector open the TS Bases and agree on what procedures are applicable? Mr. Hamm asked if the TSTF had considered making explicit references in the TS Bases to the locations of plant-specific data and procedures. Mr. Stringfellow, TSTF, replied that he did not think it would add value to list the procedures in the TS or in the TS Bases. He pointed out that every surveillance has an associated procedure, and that the procedure would list the parts of the system that needed to be evaluated, as well as, provide the relevant references to the engineering analyses. Listing the information in the TS Bases would,

therefore, be redundant, and create problems when procedures were revised because licensees would need to remember to revise the references in the TS Bases as well.

Mr. Warren Lyon, NRC, asked why is there an option for 31 days or in accordance with SFCP in SR 3.5.2.3. It was explained that the "in accordance with SFCP" is for licensee's that have already adopted TSTF-425. Mr. Mann commented that a plant without TSTF-425 would have 31 days. He added that the "or" is only for the purpose of the standard TS, actual plant TS will not have the "or," they would have one or the other. Mr. Lyon also commented that sometimes 31 days may be too long or too short. It was explained that the flexibility is there to lengthen the periodicity, but the licensee cannot "jump" from monthly to every outage; they need to step it out in accordance with the SFCP of TSTF-425. Mr. Stringfellow commented that if 31 days is too long, the licensee's corrective action program will require them to go to a shorter time frame.

The NRC staff will review the material presented and provide any feedback/comments to the TSTF by mid-December. The TSTF plans to submit the revision to TSTF-523 in March 2012.

No members of the public attended or participated via teleconference. 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

therefore, be redundant, and create problems when procedures were revised because licensees would need to remember to revise the references in the TS Bases as well.

Mr. Warren Lyon, NRC, asked why is there an option for 31 days or in accordance with SFCP in SR 3.5.2.3. It was explained that the "in accordance with SFCP" is for licensee's that have already adopted TSTF-425. Mr. Mann commented that a plant without TSTF-425 would have 31 days. He added that the "or," is only for the purpose of the standard TS, actual plant TS will not have the "or," they would have one or the other. Mr. Lyon also commented that sometimes 31 days may be too long or too short. It was explained that the flexibility is there to lengthen the periodicity, but the licensee cannot "jump" from monthly to every outage; they need to step it out in accordance with the SFCP of TSTF-425. Mr. Stringfellow commented that if 31 days is too long, the licensee's corrective action program will require them to go to a shorter time frame.

The NRC staff will review the material presented and provide any feedback/comments to the TSTF by mid-December. The TSTF plans to submit the revision to TSTF-523 in March 2012.

No members of the public attended or participated via teleconference. 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

DISTRIBUTION:

PUBLIC  
PLPB Reading File  
RidsNrrDpr  
RidsNrrDprPlpb  
RidsNrrLADBaxley

Robert Elliott  
RidsNrrPMMHoncharik  
RidsNrrDssStsb  
Matthew Hamm  
Anthony Ulses

Sheldon Stuchell  
Warren Lyon  
Jennifer Gall  
Joshua Miller  
Zeechung (Gary) Wang, RES

EXTERNAL DISTRIBUTION:

[tony.browning@nexteraenergy.com](mailto:tony.browning@nexteraenergy.com)  
[njstring@southernco.com](mailto:njstring@southernco.com)  
[brianm@excelservices.com](mailto:brianm@excelservices.com)  
[Lenglan@entergy.com](mailto:Lenglan@entergy.com)

[Kepeter@wcnoc.com](mailto:Kepeter@wcnoc.com)  
[jhr@nei.org](mailto:jhr@nei.org)  
[hlhegrat@firstenergycorp.com](mailto:hlhegrat@firstenergycorp.com)  
[andracid@westinghouse.com](mailto:andracid@westinghouse.com)

**ADAMS Accession Nos:** Package: ML113220178

Meeting summary: ML113220179

Meeting notice: ML112940302

Meeting handouts: ML113220171, ML113220164

OFFICE	PLPB/PM	PLPB/LA	PLPB/BC	PLPB/PM
NAME	MHoncharik	DBaxley	JJolicoeur	MHoncharik
DATE	11/30/11	11/29/11	11/30/11	11/30/11

Technical Specifications Task Force

Project No. 753

cc:

Technical Specifications Task Force  
11921 Rockville Pike  
Suite 100  
Rockville, MD 20852  
Attention: Donald R. Hoffman  
E-mail: [donaldh@excelservices.com](mailto:donaldh@excelservices.com)

Norman J. (Jack) Stringfellow  
Southern Nuclear Operating Company  
P.O. Box 1295  
Birmingham, AL 35201-1295  
E-mail: [string@southernco.com](mailto:string@southernco.com)

Roy A. (Tony) Browning  
Duane Arnold Energy Center  
3277 DAEC Rd.  
PSC/Licensing  
Palo, IA 52324-9785  
E-mail: [tony.browning@nexteraenergy.com](mailto:tony.browning@nexteraenergy.com)

William J. (Billy) Steelman  
Entergy Waterford 3  
17265 River Road Hwy 18  
Killona, LA 70057  
E-mail: [wsteelm@energy.com](mailto:wsteelm@energy.com)

Wendy E. Croft  
Exelon Nuclear  
200 Exelon Way, Suite 340  
Kennett Square, PA 19348  
E-mail: [wendi.croft@exeloncorp.com](mailto:wendi.croft@exeloncorp.com)

Brian D. Mann  
EXCEL Services Corporation  
11921 Rockville Pike, Suite 100  
Rockville, MD 20852  
E-mail: [brianm@excelservices.com](mailto:brianm@excelservices.com)

## Attendees at the TSTF-523 Meeting

November 17, 2011

<b>Name</b>	<b>Organization</b>
John Jolicoeur	NRC/Office of Nuclear Reactor Regulation (NRR)/Division of Policy and Rulemaking (DPR)/Licensing Processes Branch (PLPB)
*Michelle Honcharik	NRC/NRR/DPR/PLPB
Sheldon Stuchell	NRC/NRR/DPR/PLPB
Robert Elliott	NRC/NRR/ Division of Safety Systems (DSS)/Technical Specifications Branch (STSB)
Matthew Hamm	NRC/NRR/DSS/STSB
*Warren Lyon	NRC/NRR/DSS/Reactor Systems Branch (SRXB)
Jennifer Gall	NRC/NRR/DSS/SRXB
Joshua Miller	NRC/NRR/DSS/SRXB
Zeechung (Gary) Wang	NRC/Office of Nuclear Regulatory Research
Tony Browning	Technical Specifications Task Force (TSTF)
Brian Mann	TSTF
Jack Stringfellow	TSTF
Jim Riley	Nuclear Energy Institute (NEI) Gas Accumulation Team (GAT)
Ken Petersen	Strategic Teaming and Resource Sharing (STARS) (NEI GAT)
Henry Hegrat	FirstEnergy Nuclear
Jim Andracheck	Westinghouse
Les England	Entergy Services

\*Participated via teleconference.

ENCLOSURE