

December 13, 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/**
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Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE NOVEMBER 10, 2011, U.S. NUCLEAR
REGULATORY COMMISSION MEETING WITH THE TECHNICAL
SPECIFICATIONS TASK FORCE

On November 10, 2011, the U.S. Nuclear Regulatory Commission (NRC) staff met with the Technical Specifications (TS) Task Force (TSTF) representatives 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 October 21, 2011, are available in the Agencywide Documents Access and Management System (ADAMS) at Package Accession No. ML112870534.

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 TS.

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

For selected agenda items, the TSTF representatives provided handouts to facilitate discussion and/or serve as an information exchange. The presentation slides and handouts are listed below and are publicly available in ADAMS.

- Active Travelers Status Report (pages 1 through 3 of ADAMS Accession No. ML113250079).
- Traveler Review Priority (page 4 of ADAMS Accession No. ML113250079).

I. Administrative

- A. Introductions
- B. Agenda Review – Item VI.C was deleted, Items V.B and VI.G were added.
- C. Other Administrative Issues
 1. Mr. Robert Elliot, NRC, stated that the move of his branch from Division of Inspection and Regional Support to the Division of Safety Systems within the Office of Nuclear Reactor Regulation (NRR) is complete.

2. Ms. Eileen McKenna, NRC, discussed the upcoming move within the Office of New Reactors (NRO) of TS staff from the NRO Division of Construction Inspection and Operational Programs (NRO/DCIP) to the NRO Division of Safety Systems and Risk Assessment, Balance of Plant and Technical Specifications Branch (NRO/DSRA/BPTS). The reorganization will be effective on December 1, 2011. Ms. McKenna will be the new branch chief for the BPTS.

II. Discussion of Development of Improved Standard TS Revision 4

- A. Posting on NRC Website & Publication Schedule (NRC) – Mr. Gerry Waig, NRC, commented that the documents were sent to NRC's Administrative Services (ADM) for review. The ADM review should take about 30 days. The staff started on Monday (11/7/11), so the review should be done in early December. The NRC will be publishing the Revised NUREGs electronically; therefore, the documents will not go to the Government Printing Office (GPO). Instead of the documents being published by the GPO, they will be placed into ADAMS and sent out via electronic distribution.
 1. Mr. Waig is checking to see if there is a need to also publish a notice in the *Federal Register* (FR). Subsequent to the meeting, the NRC staff was told that the ADM review will take longer than originally estimated; therefore, the documents will not be issued until after February 2012.
- B. Discussion of Timing and Process for Future STS Revisions (All) – Mr. Elliott, NRC, stated that he cannot commit to future revision schedules at this time, because of lack of resources due to NRR's Fukushima effort. Mr. Elliott warned that the Fukushima effort may even impact processing of Travelers. He noted that some Fukushima items may require TS changes. Mr. Stringfellow, TSTF, asked about public meeting on December 1 to discuss NRC workload and resources. The owners' groups (OGs) and vendors want to know "pinch points" in NRC technical branches to help industry prioritize work. Mr. Elliott, NRC, commented that NRC staff will know better the impact by the meeting on December 1. Mr. Brian Mann, TSTF, commented that he has been looking at the process for how to handle future NUREG revisions. One idea was that immediately after each Traveler is approved, the Traveler would be incorporated it into the NUREG as a "living" document. Then after a certain amount of Travelers are incorporated, then NRC would re-publish the NUREGs. Discussion turned to implementation of TSTF-505 in the NUREGs. Mr. Theodore (Bob) Tjader, NRC, reminded everyone that the NRC was going to have a meeting with all reviewing branches from NEI 06-09 to discuss TSTF-505. Mr. Craig Harbuck, NRC, commented that affected technical branches from NRO need to be involved. Mr. Elliott, NRC, committed to talk with Ms. McKenna about joint training.

III. Process Issues

- A. Status of TSTF July 5, 2011, letter (ADAMS Accession No. ML11196A161) requesting NRC revise Part 9900 Technical Guidance, "Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety" (NRC)
 1. Mr. Elliott, NRC, stated that the NRC is taking the letter under advisement. However, due to the previously mentioned resource challenges, this is a low priority item. He does not foresee applying any resources to this in near future. Mr. Mann, TSTF, agreed this is not a rush.
- B. Discussion of NRC Position Expressed in Plant-Specific Requests for Additional Information (RAIs) on Core Operating Limits Report (COLR) Submittals Regarding New References (TSTF)

1. Mr. Mann, TSTF, explained that per the NRC letter dated August 4, 2011 (ADAMS Accession No. ML110660285), licensees who already have TSTF-363, -408, -419 should not be backfitted to include revision numbers and dates in the TS. He went on to explain that several licensees have received RAIs from the SRXB staff requesting the full TR citation be included in the TS. Mr. Anthony Uises, NRC, stated that without seeing the specific RAIs he can not comment much. He explained that the NRC staff's concern is being able to tell pedigree of core operating limits report (COLR). Mr. Mann, TSTF, commented that if the NRC staff has items they would like to see in the COLR, then that feedback would be good for the industry to have, perhaps via a Regulatory Information Summary (RIS). The NRC staff commented that they do not have the resources to develop a RIS "from scratch," but it would be helpful if the industry could share some best practices. Mr. Mann, TSTF, suggested a "Public workshop on COLR improvements." Mr. Benjamin Parks, NRC, agreed that a public workshop is a good idea.

IV. Active Traveler Review Status (Handout in ADAMS at pages 1 through 3 of Accession No. ML113250079)

A. Discuss Status of All Travelers Currently Under NRC Staff Review (All)

1. TSTF-426, Revision 4, "Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF [Risk-informed TSTF] Initiatives 6b & 6c"
 - a) Mr. Elliott, NRC, commented that a factually inaccurate statement in the Traveler must be removed. The staff recognizes that the statement was taken from the approved version of the topical report (TR) WCAP-16125-A, which is not accurate. The NRC will follow-up with the Pressurized Water Reactor Owners Group (PWROG) to get the TR corrected. The TSTF will revise the Traveler accordingly. Subsequent to the meeting, the TSTF submitted a revision to TSTF-426, which is available in ADAMS at Accession No. ML113260461.
2. TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)"
 - a) The TSTF will submit a revised model application. Subsequent to the meeting, the TSTF submitted a revision to the model application for TSTF-432, which is available in ADAMS at Accession No. ML113202614.
3. TSTF-490, Revision 1, "Deletion of E Bar Definition and Revision to RCS [reactor coolant system] Specific Activity Tech Spec"
 - a) The TSTF is in the process of withdrawing Revision 1; a letter should be issued within the next 2 weeks. The NRC will have to "un-CLIP" the currently approved Revision 0 of the Traveler. The TSTF requests that after the Traveler is withdrawn, the NRC staff send them a letter describing the staff's issues with the Traveler. The TSTF prefers a letter instead of a meeting at this point, due to technical expert availability.
4. TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b"
 - a) The notice for comment was signed out and will be published in the FR soon.
5. TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month"
 - a) The model SE is with Mr. Elliott, NRC, to review. He should have it signed out to Mr. John Jolicoeur, NRC, before Thanksgiving.
6. TSTF-523, Revision 0, "Generic Letter 2008-01, Managing Gas Accumulation"

- a) A meeting is scheduled for November 17, 2011. The TSTF will present to the NRC staff the proposed revisions to Traveler. The Traveler will NOT reference NEI 09-10, instead the Traveler will include the relevant information in the TS Bases.
7. TSTF-529, Revision 0, "Clarify Use and Application Rules"
 - a) Mr. Carl Schulten, NRC, is performing the acceptance review. The TSTF members explained that they proposed a rewrite to LCO 3.0.5 because wording doesn't read like a typical 3.0 surveillance requirement (SR).
8. TSTF-530, Revision 0, "Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09"
 - a) Initially, Mr. Elliott, NRC, stated that Mr. Schulten completed the acceptance review and has found the Traveler unacceptable for review. After the TSTF members explained the reason for submitting the Traveler, Mr. Elliott said that the NRC staff will take another look at the Traveler, before making a final decision.
9. TSTF-534, Revision 0, "Clarify Application of Pressure Boundary Leakage Definition"
 - a) The NRC staff has found the Traveler acceptable for review. Ms. Michelle Honcharik, will finalize the review schedule and prepare the acceptance letter. A question was raised about the fee exemption. Subsequent to the meeting it was confirmed that the Traveler is fee billable (an exemption was not requested).
10. TSTF-535, Revision 0, "Revise Shutdown Margin Definition to Address Advanced Fuel Designs"
 - a) Acceptance letter was issued. Ms. Honcharik will check with the technical staff to see if they will have RAIs.
- B. TSTF Traveler review priority (Handout in ADAMS at page 4 of Accession No. ML113250079)
 1. Mr. Brian Mann, TSTF, reviewed traveler priorities. Mr. Elliott, NRC, commented that the NRC staff agrees with the TSTF priority, with one exception: the NRC views TSTF-523 as high priority.
 2. High Priority
 - a) TSTF-505, Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b
 - b) TSTF-432, Change Technical Specifications End States (WCAP-16294)
 - c) TSTF-529, Clarify Use and Application Rules
 - d) TSTF-535, Revise Shutdown Margin Definition to Address Advanced Fuel Designs
 3. Medium Priority
 - a) TSTF-523, Rev. 0, GL 2008-01, Managing Gas Accumulation
 - b) TSTF-426, Revise or Add Actions to Preclude Entry into LCO 3.0.3 - RITSTF Initiatives 6b & 6c
 - c) TSTF-522, Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month
 - d) TSTF-530, Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09
 4. Low Priority
 - a) TSTF-490, Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec
 - b) TSTF-534, Clarify Application of Pressure Boundary Leakage Definition

V. Issues with Previously Approved Travelers

- A. Status of TSTF September 27, 2011, letter (ADAMS Accession No. ML112700438) Requesting a Revision to the Notice of Availability for TSTF-501, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control"
 - 1. Mr. Waig, NRC, commented that the letter only addressed the "each/a" issue, and not the day tank change. NRC has seen TSTF-501 related LARs coming in asking for the day tank change too, which kicks the LAR out of the CLIIP process. The TSTF considered revising the Traveler to include the day tank, but the OGs voted to not revise it. Mr. Waig also brought up a second issue of the methodology deviation. Are there other common methodologies in addition to what's identified in the TSTF-501? The License Amendment Requests (LARs) submitted with methodology deviations are undermining the CLIIP. The two LARs we received with differing methodologies are from Fermi 2 and Clinton. The TSTF members commented that they are not aware of other widely used methodologies.
- B. Status of TSTF-510 generic communication (NRC)
 - 1. Ms. Honcharik, NRC, explained that the technical staff does not plan on issuing a generic letter. They may develop a RIS to encourage the industry to adopt the Traveler. The TSTF members explained that all but one eligible licensee plans to adopt this Traveler over the next couple of years. The TSTF members recommended the NRC staff discuss the need for a RIS with NEI, since nearly everyone plans to adopt the Traveler anyway.

VI. Technical Issues

- A. Status of NRC actions related to SR 3.0.3 application to the In-Service Testing (IST) Program & Other Administrative Controls Testing (NRC)
 - 1. Mr. Schulten, NRC, is working on a revised enforcement guidance memorandum (EGM).
- B. Development of a Traveler to Revise Boiling Water Reactor (BWR) Operation with the Potential to Drain the Reactor Vessel Requirements (OPDRVs) (TSTF)
 - 1. After the EGM was issued by the NRC, Mr. Browning, TSTF, received a lot of questions from the industry. He's been answering industry questions as best he can. Mr. Browning, TSTF, asked if the NRC staff could set up a frequently asked questions (FAQ) page, similar to the one set up for NFPA-805 issues. Mr. Schulten, NRC, mentioned that the RIS on OPDRVs will be out for comment and that licensees could ask questions during the comment period. Mr. Elliott, NRC, will look at agency policy to see if his staff can set up a FAQ page. A draft RIS will be attached to the FR notice of the meeting to discuss the RIS. The TSTF members proposed the morning of Tuesday, December 13, 2011, for the RIS meeting. Tentative date for a "straw man" of the OPDRVs Traveler is spring 2012. The TSTF members will have a better idea of the submittal date at the next quarterly meeting.
- C. ~~Revising the NFPA-805, Regulatory Guide 1.205 License Condition (TSTF)~~ Agenda item deleted
- D. Response to NRC Request to Revise the BWR/6 STS 3.8.1 Bases (TSTF)
 - 1. During the August 4, 2011, meeting this issue was brought up. The TSTF researched it and sent the NRC a white paper on the history of this Specification (ADAM Accession No. ML113250593). The TSTF believes it is an appropriate statement in the bases and that a change is not necessary because it's consistent with the licensee basis. Mr. Elliott, NRC, asked if intention was for the diesel generators (DGs) to have 17 days – why not just give 17 days. Why should the TS require declaring an operable system inoperable to gain more time? Mr. Harbuck,

NRC, clarified that we were discussing NUREG-1434, which only affects 6 or 7 plants (BWR/5 and BWR/6). Mr. Elliott, NRC, explained that his concern is that operators are implementing “declare” inoperable, with “make” inoperable and losing an operable safety system. The TSTF offered to find out what the operators actually do – are they actually rendering it inoperable? This item will be discussed again at the next meeting.

E. Status of TSTF-493 Implementation Guidance (All)

1. Mr. Schulten, NRC, explained that he spoke with Mr. David Rahn, NRC, and that there is no intention by the instrumentation and controls branch (EICB) staff members to go separate from us. The white paper is under review by the NRC staff; Mr. Rahn is passing the white paper around to get comment on it. It was noted that Westinghouse is coming in for a meeting on December 14, 2011. Mr. Elliott, NRC, stated he will re-review what the NRC agreed to in the February 2009 letter regarding what is needed to make a change to set point methodology and follow-up with technical staff in the EICB. Mr. Schulten, NRC, will check on the schedule. Mr. Schulten, NRC, will schedule an internal meeting with appropriate NRC staff members to discuss review of the white paper and industry trepidation over submitting LARs for Option A.

F. Status of NRC Technical Staff Orientation on TSTF-425 (NRC)

1. Mr. Elliott, NRC, stated that he gave one presentation to the then Division of Component Integrity in September 2011, which is now part of the Division of Engineering. Mr. Elliott’s presentation is on all Risk-Informed Initiatives and TSTF-493, if appropriate. He plans to present to DSS staff next.

- G. The TSTF invited Mr. Elliott, NRC, to attend the official joint meeting of two OGs on Wednesday, December 7, 2011, to address resources and implication on normal LARs, Travelers, etc. They would consider other topics too. This meeting is an opportunity for NRC staff to talk to the working level licensing staff from every plant in country.

VII. Future Planning

- A. Proposed Dates for TSTF/NRC Quarterly Meetings in 2012. The NRC staff proposed the following dates:

January 30-February 3 or February 21-24
April 30-May 4
August 6-10
November 12-16

Please direct any inquiries to me at 301-415-1774 or at Michelle.Honcharik@nrc.gov.

Project No. 753

Enclosure:
List of Attendees

cc w/encl: See next page

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Project No. 753

Enclosure:
List of Attendees

cc w/encl: See next page

ADAMS Accession Nos: Package: ML113350536, Meeting summary: ML11326A300
Meeting notice and agenda: Package Accession No. ML112870534 Meeting handouts: ML113250079

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DATE	11/28/11	12/5/11	12/13/11	12/13/11

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Project No. 753

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**Attendees at the U.S. Nuclear Regulatory Commission (NRC) and
Technical Specifications Task Force (TSTF) Meeting**

November 10, 2011

Name	Organization
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
Robert Elliott	NRC/NRR/Division of Safety Systems (DSS)/Technical Specifications Branch (STSB)
Kristy Bucholtz	NRC/NRR/DSS/STSB
Gerald Waig	NRC/NRR/DSS/STSB
Matthew Hamm	NRC/NRR/DSS/STSB
Ravi Grover	NRC/NRR/DSS/STSB
Carl Schulten	NRC/NRR/DSS/STSB
Eileen McKenna	NRC/Office of New Reactors (NRO)/Division of Safety Systems and Risk Assessment (DSRA), Balance of Plant and Technical Specifications Branch (BPTS)
Theodore (Bob) Tjader	NRC/NRO/DSRA/BPTS
C. Craig Harbuck	NRC/NRO/DSRA/BPTS
Bruce Jones	NRC/NRO/DSRA/BPTS
Anthony Ulses	NRC/NRR/DSS/Reactor Systems Branch (SRXB)
Benjamin Parks	NRC/NRR/DSS/SRXB
Tai Huang	NRC/NRR/DSS/SRXB
*Nancy Chapman	Bechtel
Jana Bergman	Sciencetech
Tony Browning	TSTF
Brian Mann	TSTF
Jack Stringfellow	TSTF
*William Steelman	TSTF
Tomohiro Hojo	Japan Nuclear Energy Safety Organization (JNES)
You Onishi	JNES
Chie Kwaragi	JNES
Hariku Chikada	JNES
Motomu Suzuki	JNES

*Participated via teleconference.

ENCLOSURE