

May 25, 2012

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
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SUBJECT: SUMMARY OF THE FEBRUARY 15, 2012, U.S. NUCLEAR
REGULATORY COMMISSION MEETING WITH THE TECHNICAL
SPECIFICATIONS TASK FORCE

On February 15, 2012, 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 January 25, 2012, are available in the Agencywide Documents Access and Management System (ADAMS) under Package Accession No. ML120180495.

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.

- Item IV.A - Active Travelers Status Report (ADAMS Accession No. ML121210725).
- Item IV.B - Traveler Review Priority (ADAMS Accession No. ML121210726).
- Item V.A - TSTF Comments on NRC Operating Experience Smart Sample (OpESS) 2012/02, "Technical Specification Interpretation and Operability Determination" (ADAMS Accession No. ML121210727).
- Item V.F - TSTF Response to NRC Staff Position [on Use and Application of TS 3.8.1, AC [Alternating Current] Sources Operating, Applicability Note Relating to Inoperability of the Division 3 Diesel and HPCS [High Pressure Core Spray]] (ADAMS Accession No. ML121210730).

II. Process Issues

- A. Status of Issuance of Standard TS (STS) Revision 4
Still on track for NRC publication in March 2012.
- B. Status of TSTF July 5, 2011, letter (ADAMS Accession No. ML11196A161) requesting NRC to revise Part 9900 Technical Guidance, "Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety"
Mr. Carl Schulten, NRC, has not had the opportunity to fully review the letter with regard to the Part 9900 technical guidance yet but it is rising in priority. He will include regional input as part of his review. The TSTF members are concerned with members in the industry retiring and are concerned about leaving a legacy for the next generation so they do not have to figure it out in the future.
- C. Sharing of Improved STS Conversion Safety Evaluations
The NRC and TSTF have shared ITS conversion safety evaluations with the goal of both groups having a complete set. All safety evaluations have been located in ADAMS, except for Brunswick and Fermi. The TSTF has the Brunswick safety evaluation loaded onto their website for Ms. Kristy Bucholtz, NRC, to download. Ms. Bucholtz will add the document to ADAMS and will send the ADAMS Accession number to Mr. Brian Mann, TSTF, went completed.

III. 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 (NOA) for TSTF-501, "Relocate Stored Fuel Oil and Lube Oil Volume Values to Licensee Control."
 - 1. Mr. Robert Elliott, NRC, signed the revised model safety evaluation and model application (the models) for TSTF-501 that will replace the current models. The new models address the each/a diesel generator concern and are with Ms. Michelle Honcharik, NRC, for processing.
 - 2. Subsequent to the meeting it was determined by the NRC staff that the changes were editorial in nature. Therefore the models were replaced in ADAMS (in lieu of republishing in the *Federal Register*). The ADAMS Accession No. of ML100850094 remains the same.
- B. Errata Correction to TSTF-510, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection"
 - 1. TSTF-510, Revision 2, "Revision to Steam Generator Program Inspection Frequencies and Tube Sample Selection," was approved by the NRC on October 27, 2011. It is applicable to all pressurized water reactors (PWRs). All PWR sites are planning on adopting this TSTF traveler.
 - 2. One of the editorial improvements in TSTF-510 was revising references to "tube repair criteria" to "tube plugging [or repair] criteria." Not all plants have approved tube repair criteria, so references to tube repair are bracketed to indicate they are plant specific
 - 3. One instance of revising "alternate tube repair criteria" to "alternate tube plugging [or repair] criteria" was missed. Specifically, in the Steam Generator Tube Inspection Program in Section 5.5 of the TSs, there are three versions of paragraph d.2 (one each for 600MA tubing, 600TT tubing, and 690TT tubing).
 - 4. The model application for TSTF-510 states that it is available under the Consolidated Line Item Improvement Process (CLIIP). The TSTF is concerned that plant-specific License Amendment Requests (LARs) to adopt TSTF-510 that include a revision to paragraph d.2 to state "tube plugging criteria" or "tube

plugging or repair criteria" will result in the submittal being removed from the CLIIP and subjected to technical staff review. That will result in additional review resources for the NRC and added expense to licensees.

5. The TSTF is going to submit an errata letter addressing this issue, which can be referenced in LAR submittals. The NRC will respond in writing to the TSTF letter. Subsequent to the meeting the TSTF submitted the letter. It is available in ADAMS at Accession Number ML12088A082.

IV. Active Traveler Review Status (Handout in ADAMS at Accession No. ML121210725)

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

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) On schedule to publish the Notice for Comment by April 20, 2012.
2. TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)"
 - a) Was published in the *Federal Register* for public comment. Comment period ends February 29, 2012. Projecting NOA in April.
3. TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b"
 - a) On schedule to publish the NOA by March 30, 2012.
 - b) The Technical Specifications Branch staff has started training the technical staff on TSTF-505 and TSTF-425.
4. TSTF-522, Revision 0, "Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month"
 - a) On schedule to publish the Notice for Comment by March 16, 2012.
5. TSTF-523, Revision 0, "Generic Letter 2008-01, Managing Gas Accumulation"
 - a) On schedule for TSTF to submit a revision by March 30, 2012.
6. TSTF-529, Revision 0, "Clarify Use and Application Rules"
 - a) Discussed under Item V.G below.
7. TSTF-530, Revision 0, "Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09"
 - a) Discussed under Item V.G below.
8. TSTF-534, Revision 0, "Clarify Application of Pressure Boundary Leakage Definition"
 - a) Mr. Steve Jones, NRC, and Mr. Greg Casto, NRC, discussed the proposed changes and the need for a meeting.
 - b) Mr. Jones explained that from the Davis-Besse lessons learned, the NRC staff is very sensitive to leakage and determining whether the leak is safety significant. The NRC staff is concerned that the proposed change would allow a licensee to ignore a safety significant through-wall leak in the Reactor Coolant System Pressure Boundary.
 - c) The TSTF is to determine the appropriate industry participants and suggest several meeting dates to the NRC.
9. TSTF-535, Revision 0, "Revise Shutdown Margin Definition to Address Advanced Fuel Designs"
 - a) On schedule to publish the Notice for Comment by June 4, 2012.

B. TSTF Traveler review priority (Handout in ADAMS at Accession No. ML121210726)

1. 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
2. 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 [Limiting Condition for Operation] 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 [Surveillance Requirement] 3.0.3 to be Consistent with Generic Letter 87-09
3. Low Priority
- a) TSTF-534, Clarify Application of Pressure Boundary Leakage Definition

V. Technical Issues

- A. TSTF Concerns regarding NRC Operating Experience Smart Sample (OpESS) 2012/02, "Technical Specification Interpretation and Operability Determination" (ADAMS Accession No. ML11321A229) (Handout in ADAMS at Accession No. ML121210727).
- 1. The TSTF members commented that they are not familiar with and do not understand the NRC process for an OpESS. NRC staff commented that they had considered issuing a Regulatory Information Summary (RIS) instead but it was determined that a RIS would be too broad and the meaning would be lost.
 - 2. The TSTF members commented that they see the same trend that the NRC staff does. They are wondering if it is due to new industry personnel, since the more experienced people are leaving/retiring. They feel possibly more training is needed for the operators
 - 3. NRC stated that the OpESS will be discussed during the Regulatory Information Conference in session TH26, "Conservatism in Decision-Making [Recent Operating Experience]. The topic is being presented by the Operating Experience Branch, not the Technical Specifications Branch.
 - 4. Mr. Elliott stated he did not think any TS changes are needed to address OpESS 2012/02.
 - 5. The TSTF members stated that industry personnel have been calling the TSTF because NRC inspectors are asking questions. TSTF is focusing on the text and they feel the text is not as clear as it could be. TSTF would have preferred a chance to review and provide comments before the release of OpESS 2012/02.
 - 6. TSTF will provide a write up and is willing to have further discussions on this topic.
 - 7. NRC will check to see if OpESS process allows public review and comments.
- B. Status of NRC Actions related to SR 3.0.3 Application to the In-Service Testing Program and Other Administrative Controls Test
- 1. The NRC stated that the Enforcement Guidance Memorandum (EGM) is imminent and instructs licensees to follow the existing TS requirements and historical application. There is one more internal meeting tomorrow and NRC is continuing to work this issue
 - 2. TSTF asked if they should get a TSTF traveler ready for submittal. Mr. Elliott responded with yes the language should be developed in the traveler. TSTF and NRC discussed the need for a relief request and TS change within one traveler

when code case is approved. It was agreed that the model application should include both. TSTF estimates a 2014 submittal.

3. Mr. Schulten is to verify that the time for licensee action regarding the EGM will allow for compliance during sometime in 2014 due to Fukushima commitments.
- C. Development of a Traveler to Revise Boiling Water Reactor (BWR) Operation with the Potential to Drain the Reactor Vessel Requirements (OPDRVs) (TSTF)
- TSTF/BWROG is having trouble developing a Traveler. They are facing many challenges and have trouble trying to write Conditions. They stated they are trying to get rid of the term OPDRV and instead have a reactor pressure vessel (RPV) water inventory LCO. In addition, they stated that if they fall too far behind schedule that they will go to plan B.
- As written, the TSTF stated that the EGM would be a very restrictive method and would not be used due to the activities that need to be conducted would not be allowed under the EGM. Specifically, the 72 hour drain down time. TSTF asked if the rules (with respect to the calculations in the EGM) could be clarified in the RIS or clarified in a revision to the EGM. TSTF will provide markup of the EGM with suggestions for NRC review.
1. The RIS is proceeding slowly; it will not be issued soon.
 2. The TSTF discussed the difficulties in developing the TS changes, given that there is no accident analysis or a clear set of assumptions from which to proceed. However, progress is being made. They stated they are trying to get rid of the term OPDRV and instead have a RPV water inventory LCO.
 3. The TSTF discussed the difficulty with implementing the OPDRV EGM. As written, the EGM would be a very restrictive method and would not be used due to the activities that need to be conducted would not be allowed under the EGM. Specifically, the requirement that the calculated drain down rate cannot result in the water level reaching the reactor vessel flange for 72 hours severely limits application of the EGM. For Duane Arnold, that equates to a 3/4-inch line.
 4. The NRC was willing to consider changes to the EGM in order to increase its usefulness, but not a rewrite.
 5. **(ACTION)** The TSTF will create a white paper recommending changes and clarifications to the EGM for NRC consideration.
- D. NRR and TSTF Involvement in the Office of New Reactors (NRO) Activity to Develop a Formal Position on Section 50.36(c)(2)(ii)(D) to Title 10 of the *Code of Federal Regulations* (10 CFR)
1. TSTF would like opportunity to provide input/comments on NRO documents.
 2. NRO expects to issue the document for public review and comment by the end of March. The TSTF is invited to provide comments.
- E. Status of TSTF-493 Implementation Guidance (All)
1. The document was delayed due to the assignment of a new branch chief of the I&C Branch. Mr. Elliott suggested a public meeting be used to release the guidance and would allow for the proper discussions.
 2. The NRC will send the document by letter to the TSTF once complete.
- F. Response to NRC Request to Revise the BWR/6 STS 3.8.1 Bases (Handout in ADAMS at Accession No. ML121210730)
1. NUREG-1434 TS 3.8.1 LCO requires three diesel generators (DGs) to be Operable in Modes 1, 2, and 3. The Applicability of Specification 3.8.1 is modified by an Applicability Note which states:

- "[Division 3] AC electrical power sources are not required to be OPERABLE when High Pressure Core Spray System [2C Standby Service Water System] is inoperable."
2. The TS Bases describe the Applicability Note as follows:

"A Note has been added taking exception to the Applicability requirements for Division 3 sources, provided the HPCS System is declared inoperable. This exception is intended to allow declaring of the Division 3 inoperable either in lieu of declaring the Division 3 source inoperable, or at any time subsequent to entering ACTIONS for an inoperable Division 3 source. This exception is acceptable since, with the Division 3 inoperable and the associated ACTIONS entered, the Division 3 AC sources provide no additional assurance of meeting the above criteria." (emphasis added)
 3. The TSTF provided a white paper to the NRC staff via e-mail on October 11, 2011 (ADAMS Accession No. ML113250593). In response, the NRC staff provided the TSTF with a staff position (ADAMS Accession No. ML121210766). The NRC staff questioned this allowance and feels that it is contrary to the use and application of TS, compromises safety, and is not supported by NUREG-1434 or other NRC Regulation.
 4. At the meeting, the TSTF provided a response to the NRC's staff position. The TSTF response described how the allowance was in pre-ISTS requirements and included the history that demonstrates that the current allowance was intentionally included in the ISTS by the NRC.
 5. The NRC stated that their concern is that the Bases tell the licensee to declare an otherwise Operable component inoperable for the purpose of extending the Completion Time. The NRC believes this sends the wrong message to licensees and promotes nonconservative decision making.
 6. The TSTF agreed to draft a Traveler which removes the Bases information and provides a 17-day Completion Time for the Division 3 DG; restoring the pre-ISTS allowance. This will improve the presentation and address the NRC's concern. However, not adopting the Traveler does not change plants' current licensing basis and TS.
- G. Discussion of Changes to Existing Section 3.0 of the STS because of Resulting Challenges with Non-Uniformity across Licensees
1. TSTF stated that proposed 3.0 changes do not change the intent of the TS or how it is used. If a licensee does not make a change, NRC can still refer to the new STS, which does not change the interpretation. The content is the same it is just a new way to present the information.
 2. The NRC expressed concern that approval of TSTF-529, "Clarify Use and Application Rules" and TSTF-530, "Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09" would result in inconsistencies across the licensee fleet and standardization will be lost in the industry.
 3. The NRC staff must have a compelling reason to make changes to Section 3.0 of the TS because contrary to the industry legacy concern, the STS is not an applicable NRC staff position when interpreting plant-specific TS. The STS reflect the staff's position.
 4. The TSTF stated that the TSTF-529 changes simply clarify existing requirements with no change in intent. Therefore, incorporating the Traveler into the ISTS provides the NRC staff position in an easily referenced location, regardless of whether it is adopted by licensees. However, the TSTF believes the Traveler will be widely adopted to avoid inspection issues.

5. The TSTF stated that TSTF-530 corrects a situation in which a plant shutdown could be required for situation in which the safety significance is the same as situations in which a SR can be delayed up to its Frequency. That discourages licensees to be proactive.
- H. Removal of the NOTE Regarding Applicability in Mode 1 from NUREG-1432 (Combustion Engineering Plants) SR 3.4.1.3
 1. LCO 3.4.1, "RCS Pressure, Temperature, and Flow [DNB] Limits," is applicable in Mode 1.
 2. In NUREG-1432, SR 3.4.1.3 states:
 -----NOTE-----
 Only required to be met in MODE 1.

 Verify RCS total flow rate \geq [148 E6] lb/hour.
 3. The NUREG-1430 and NUREG-1431 (Babcock & Wilcox and Westinghouse) LCO Applicability is the same (Mode 1) and the equivalent SRs are not modified by a Note.
 4. The NRC questioned the need for the Note.
 5. The TSTF stated that it appears that the Note exists from the pre-ISTS requirements in which the LCO was applicable in Modes 1 and 2. The TSTF agrees that the Note adds no value and can be removed. However, the Note also does no harm and, therefore, it is unlikely a licensee would remove the Note unless as part of another amendment request.
 6. The TSTF will draft a "T" Traveler to remove the Note and its Bases.
 7. The NRC staff will remove the Note in the next Revision to the STS.

VI. Future Planning

- A. Potential Traveler to Facilitate Use of Lead Test Assemblies
 1. The TSTF discussed the potential for a process-oriented Topical Report and changes to the ISTS to reference the report to facilitate lead test assembly use. EPRI and The Nuclear Energy Institute have the lead to develop the Topical Report with TSTF support.
 2. The TSTF does not expect to submit a Traveler for at least 18 months
- B. Proposed Dates for TSTF/NRC Quarterly Meetings in 2012
 May 9, 2012, August 8, 2012, and tentatively November 8, 2012.
- C. Future traveler submittals
 1. TSTF-454, Revision 2, "Extend PCIV [Primary Containment Isolation Valve] Completion Times [CT] (NEDC-33046)," for BWRs (February) - Medium Priority
 2. TSTF-536, CE Digital Plant SRs (February) - Low Priority
 3. TSTF-537, "Increase CIV [Containment Isolation Valve] Completion Time; Update of TSTF-373," for CE plants (February) - Medium Priority
 4. TSTF-531, "Revision of Specification 3.8.1, Required Actions B.3.1 and B.3.2," to clarify the requirements for performance of a common cause failure determination for an inoperable DG (March) - Medium Priority
 5. BWROG 6a Traveler (March) - Medium Priority
 6. TSTF-523, Revision 1, "Generic Letter 2008-01, Managing Gas Accumulation," (March) - Medium Priority

J. Jolicoeur

- 8 -

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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**ADAMS Accession Nos.: Pkg.: ML12121A599, Summary: ML12121A604;
Meeting Notice/Agenda: Pkg.: ML120180495; Meeting Handouts: ML121210725,
ML121210726, ML121210727, ML121210730**

NRR-043

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NAME	MHoncharik	DBaxley	JJolicoeur	MHoncharik
DATE	5/11/2012	5/15/2012	5/25/2012	5/25/2012

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

February 15, 2012

Name	Organization
John Jolicoeur	NRC/Office of Nuclear Reactor Regulation (NRR)/Division of Policy and Rulemaking (DPR)/Licensing Processes Branch
William Ruland	NRC/NRR/Division of Safety Systems (DSS)
Robert Elliott	NRC/NRR/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
Shaun Anderson	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
Keith Hoffman	NRC/NRR/Division of Engineering (DE)/ Piping and NDE Branch (EPNB)
Jennifer Gall	NRC/NRR/DSS/Reactor Systems Branch (SRXB)
Greg Casto	NRC/NRR/DSS/Balance of Plant Branch (SBPB)
Steve Jones	NRC/NRR/DSS/SBPB
Tony Browning	TSTF
Brian Mann	TSTF
Jack Stringfellow	TSTF
William Steelman	TSTF
Wendy Croft	TSTF
*Jana Bergman	Scientech

*Participated via teleconference.

ENCLOSURE

Technical Specifications Task Force
cc:

Project No. 753

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