

October 1, 2012

Technical Specifications Task Force (TSTF)
11921 Rockville Pike
Suite 100
Rockville, MD 20852

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION (NRC) STAFF RESPONSE TO
TSTF LETTER DATED JULY 4, 2012, REGARDING TSTF RESPONSE TO NRC
REQUEST TO REVISE TSTF TRAVELER MODEL APPLICATIONS

Dear Members of the TSTF:

The NRC staff has completed its review of your letter dated July 4, 2012 (ADAMS Accession No. ML12187A184). The letter was in response to our request at the May 8, 2012, public meeting that Traveler model applications, be revised to address operating plants that were licensed before the provisions of Appendix A to Part 50, "General Design Criteria [GDC] for Nuclear Power Plants," of Title 10 of the *Code of Federal Regulations* (10 CFR), as well as, operating plants that were licensed after the provisions of Appendix A to 10 CFR Part 50.

In your letter, you proposed the following four steps to address our request:

1. Future Travelers will continue to discuss the 10 CFR [Part] 50 Appendix A GDC, as needed.
2. Future Traveler model applications for Travelers that discuss the GDC will instruct licensees that are not licensed to the 10 CFR [Part] 50, Appendix A GDC to discuss in the LAR [license amendment request] their plant-specific licensing basis that is equivalent to the GDC referenced in the Traveler. [A model application example was provided.]
3. In future model SEs [safety evaluations], the NRC should provide guidance to reviewers to utilize the discussion of the 10 CFR [Part] 50, Appendix A GDC in the model SE or the licensee-provided discussion of plant-specific requirements, as applicable.
4. The TSTF will recommend that licensees adopting previously-approved Travelers do the following:
 - a. If the Traveler or model SE reference the 10 CFR [Part] 50, Appendix A GDC and [the GDC are] consistent with the plant's licensing basis, the model application should be used as written.
 - b. If the Traveler or model SE reference the 10 CFR [Part] 50, Appendix A GDC and [the GDC are] not consistent with the

plant's licensing basis, a discussion similar to the example in Item 2 should be included in the model application, Section 2.1, "Applicability of the Published Safety Evaluation." We do not expect that this variation will result in a Traveler being removed from Consolidated Line Item Improvement Process (CLIIP), if applicable.

The NRC staff has completed its review of your letter. The NRC staff agrees that future Travelers should (1) continue to discuss the 10 CFR Part 50 Appendix A GDC, and (2) licensees that were licensed before the provisions of Appendix A to 10 CFR Part 50 will need to discuss in their LARs their plant-specific licensing basis that is equivalent to the GDC referenced in the Traveler. The NRC staff finds that the model application example provided in Item 2 of the July 4, 2012, letter sufficiently requests the plant-specific licensing basis equivalent to the 10 CFR Part 50 Appendix A GDC, as well as its location in the plant's final safety analysis report. In addition, the NRC staff agrees with inserting a Note into future Traveler model SEs to remind NRC reviewers that the plant-specific licensing basis equivalent to the GDCs should be used for plants that were licensed before the provisions of Appendix A to 10 CFR Part 50.

Licensees with plants licensed after the provisions of Appendix A to 10 CFR Part 50 should use the model application as written when requesting a previously-approved Traveler. When adopting a previously-approved Traveler, if the plant was licensed before the provisions of Appendix A to 10 CFR Part 50, the licensee shall provide in the LAR the plant-specific licensing basis equivalent to the 10 CFR Part 50 Appendix A GDC, as well as its location in the plant's final safety analysis report in order for the LAR to remain in the CLIIP. If this information is not provided, the NRC staff will remove the LAR from the CLIIP and the LAR will be treated as a normal license amendment and, as such, will be subject to the normal licensing action review timeliness metrics as stated in LIC-101, "License Amendment Review Procedures."

Please contact Michelle C. Honcharik at (301) 415-1774 or Michelle.Honcharik@nrc.gov if you have any questions or need further information on this letter.

Sincerely,

/RA/

Sheldon D. Stuchell, Acting Chief
Licensing Processes Branch
Division of Policy Rulemaking
Office of Nuclear Reactor Regulation

Project No. 753

cc: See next page

plant's licensing basis, a discussion similar to the example in Item 2 should be included in the model application, Section 2.1, "Applicability of the Published Safety Evaluation." We do not expect that this variation will result in a Traveler being removed from Consolidated Line Item Improvement Process (CLIP), if applicable.

The NRC staff has completed its review of your letter. The NRC staff agrees that future Travelers should (1) continue to discuss the 10 CFR Part 50 Appendix A GDC, and (2) licensees that were licensed before the provisions of Appendix A to 10 CFR Part 50 will need to discuss in their LARs their plant-specific licensing basis that is equivalent to the GDC referenced in the Traveler. The NRC staff finds that the model application example provided in Item 2 of the July 4, 2012, letter sufficiently requests the plant-specific licensing basis equivalent to the 10 CFR Part 50 Appendix A GDC, as well as its location in the plant's final safety analysis report. In addition, the NRC staff agrees with inserting a Note into future Traveler model SEs to remind NRC reviewers that the plant-specific licensing basis equivalent to the GDCs should be used for plants that were licensed before the provisions of Appendix A to 10 CFR Part 50.

Licensees with plants licensed after the provisions of Appendix A to 10 CFR Part 50 should use the model application as written when requesting a previously-approved Traveler. When adopting a previously-approved Traveler, if the plant was licensed before the provisions of Appendix A to 10 CFR Part 50, the licensee shall provide in the LAR the plant-specific licensing basis equivalent to the 10 CFR Part 50 Appendix A GDC, as well as its location in the plant's final safety analysis report in order for the LAR to remain in the CLIP. If this information is not provided, the NRC staff will remove the LAR from the CLIP and the LAR will be treated as a normal license amendment and, as such, will be subject to the normal licensing action review timeliness metrics as stated in LIC-101, "License Amendment Review Procedures."

Please contact Michelle C. Honcharik at (301) 415-1774 or Michelle.Honcharik@nrc.gov if you have any questions or need further information on this letter.

Sincerely,

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Sheldon D. Stuchell, Acting Chief
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*concurring via e-mail

NRR-106

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