

December 4, 2012

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

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

SUBJECT: SUMMARY OF OCTOBER 17, 2012, MEETING WITH THE BOILING
WATER REACTOR OWNERS' GROUP (BWROG) MEMBERS OF THE
TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) RE: PRE-
SUBMITTAL OF REACTOR PRESSURE VESSEL (RPV) WATER
INVENTORY TRAVELER

Mr. Tony Browning (TSTF) reviewed the background of the current technical specification (TS) requirements related to operations with the potential to drain the reactor vessel (OPDRVs). He discussed how there is no formal definition of an OPDRV in the TS, that the safety basis is unclear, and that there is a "one size fits all" approach. Enforcement Guidance Memorandum (EGM) 11-003, which expires on December 31, 2013, contains the U.S. Nuclear Regulatory Commission's (NRC's) plain language definition of OPDRV and provides enforcement discretion for compliance with TSs that establish requirements for OPDRVs. The EGM set the NRC's expectation for industry to have a final resolution on a graded approach to OPDRVs. The TSTF Traveler will be that final resolution.

Mr. Browning detailed the key decisions that the TSTF made in developing the TS changes. The TSTF decided to replace the term OPDRV with the more accurate conceptual term, RPV water level inventory control. The TSTF proposed to pull all the requirements related to OPDRV (which are currently scattered through the TS) and put them into a TS entitled "RPV Water Level Inventory Control." The TSTF proposes to place the "new" TS into the existing limiting condition for operation (LCO) 3.5.2, "ECCS [emergency core cooling system] Shutdown," which replaces the current LCO 3.5.2 with the new TS requirement.

Mr. Browning went on to explain the key assumptions the TSTF members used when developing the new RPV water level inventory control TS: an OPDRV is not an "accident" and should be treated similar to an abnormal operational occurrence in TS; the goal of the proposed TS is to protect the safety limit; the "new" TS does not account for any additional single failure/loss-of-offsite power/natural hazard occurrences; common mode failures are considered; the new TS will meet Criterion 4 of 50.36(c)(2)(ii) to Title 10 of the *Code of Federal Regulations* be based upon operating experience; and the new TS will follow the shutdown risk management guidelines of NUMARC 91-06.

Mr. Browning explained that when developing the new TS requirements, the TSTF members re-evaluated EGM 11-003 requirements. The proposed approach the TSTF used centers around the EGM 11-003 drain down time (i.e., hours) in lieu of leakage rates (i.e., gallons per minute) or penetration size (i.e., inches). The reference point used for this approach is the top of active fuel in lieu of the RPV flange. Mr. Browning then discussed the draft of the new TS, which would be numbered 3.5.2, replacing the "ECCS Shutdown" specification and entitled "RPV Water Level Inventory Control." The drain down time would be calculated by using either the worst case drain path or by adding up multiple drain paths for common cause leaks.

Mr. Robert Elliott (NRC) commented that additional NRC technical staff will need to be involved. Other NRC comments included the NRC staff's concern with the amount and level of detail to be included in the TS Bases. The NRC staff also questioned how they would be able to inspect or enforce these new TS requirements, with so much of the detail in the TS Bases. One recommendation was to have definitions of "protected" and "unprotected" in the Definitions section instead of the TS Bases.

The next steps agreed upon during the meeting are: The TSTF will prepare a draft of the Traveler, including proposed TS and TS Bases changes soon. A follow-up pre-submittal meeting will be scheduled sometime in late January 2013. All appropriate NRC technical branches will be invited to the next meeting as well as the Office of the Chief Financial Officer. The TSTF plans to submit the Traveler for review in February 2013.

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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DATE	11/27/2012	11/20/2012	11/29/2012	12/4/2012

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**LIST OF ATTENDEES AT MEETING BETWEEN THE U.S. NUCLEAR REGULATORY
COMMISSION (NRC) AND THE BOILING WATER REACTOR OWNERS' GROUP (BWROG)
MEMBERS OF THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) REGARDING
THE PRE-SUBMITTAL OF REACTOR PRESSURE VESSEL WATER INVENTORY
TRAVELER**

October 17, 2012

Name	Organization
Michelle Honcharik	NRC/Office of Nuclear Reactor Regulation (NRR)/Division of Policy and Rulemaking (DPR)/Licensing Processes Branch
Robert Elliott	NRC/NRR/Division of Safety Systems (DSS)/Technical Specifications Branch (STSB)
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Carl Schulten	NRC/NRR/DSS/STSB
Warren Lyon	NRC/NRR/DSS/Reactor Systems Branch (SRXB)
Harold Walker	NRC/NRR/DSS/Containment Ventilation Branch (SCVB)
Shaun Anderson	NRC/NRR/DSS/STSB
Theodore (Bob) Tjader	NRC/Office of New Reactors (NRO)/Division of Safety Systems and Risk Assessment (DSRA), Balance of Plant and Technical Specifications Branch (BPTS)
Richard Plasse	NRC/DSS/Balance of Plant Branch (SBPB)
Tony Browning	BWROG/TSTF
Brian Mann	TSTF
Mitchell Matthews	BWROG
Rick Loeffler	BWROG/TSTF
Richard Russin	BWROG
Bradley Ferrell	First Energy

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Project No. 753

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