

July 25, 2013

MEMORANDUM TO: Anthony J. Mendiola, 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 OCTOBER 18, 2012, MEETING WITH THE TECHNICAL  
SPECIFICATIONS TASK FORCE (TSTF) TO DISCUSS PART 9900

On October 18, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff met with the Technical Specifications Task Force (TSTF) representatives to discuss to TSTF-proposed changes to the NRC Inspection Manual Chapter (IMC) Part 9900, "Technical Guidance, Operability Determinations and Resolution of Nonconformances of Structures, Systems, and Components." The TSTF submitted a later dated July 5, 2011 (ADAMS Accession No. ML11196A161), requesting changes related to the definitions of "specified function" and "specified safety function." 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 3, 2012, is available in the ADAMS under Accession No. ML12270A185.

Mr. Robert Elliott, NRC, opened the meeting by clarifying that the purpose of the meeting was to gain an understanding of the issues but no regulatory decisions would be made.

Members of the TSTF provided the handout, "Proposed Changes to the Part 9900 Inspection Manual Chapter, 'Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety'" (ADAMS Accession No. ML13169A365).

Tim Kobetz, NRC, provided an overview of the intent to eventually remove items from the IMC Part 9900 and placed them in other documents, because the information is essentially inspector guidance. A timeline has not been determined for this effort, but will be done of the next couple of years. NRC staff commented that in the future we do not plan to send out documents such as IMCs for comments.

Peter LeBlond, LeBlond and Associates, conducted an overall presentation describing the history of the development of the IMC Part 9900.

The problems with the Part 9900 definition - that specified function (SF) and specified safety function (SSF) mean the same - were reviewed as was how the definition of operability has

changed from pre-1993 to post-1993. The industry provided examples from TS and NRC training slides demonstrating that they should not be the same.

Mr. Elliott, NRC, stated that SF and SSF are the same. The reason is that the Part 9900 guidance applies to all operating plants; those plants that use SF in the TS definition of Operable-Operability and the others that use SSF. TS Operable-Operability has the same meaning throughout the industry regardless of the use of either the SF or SSF term in the definition of operability.

NRC staff and TSTF members agreed that there are disconnects in definitions across documents. Both parties agreed that it should be defined once as "specified safety function." Everyone present also agreed that the definition of SSF cannot replace or contradict Title 10 of the *Code of Federal Regulations* Section 50.36.

NRC staff offered the TSTF members the opportunity to provide the NRC a draft clarifying the definition.

Mr. Brian Mann, TSTF, discussed the "Proposed Changes to Appendices C.1 and C.2 to Clarify the Relationship Between General Design Criteria (GDC) and Technical Specifications Operability."

NRC staff and TSTF members agreed that stating a plant is nonconforming to a GDC is a misnomer and the current licensing basis should be used instead.

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**ADAMS Accession Nos.: Package – ML12303A038; Summary – ML12303A041; Handout - ML13169A365; Notice - ML12270A185; \*Concurred via e-mail** **NRC-001**

OFFICE	PLPB/PM	PLPB/LA	STSB/BC	PLPB/BC	PLPB/PM
NAME	MHoncharik	DBaxley	RElliott*	(MHoncharik for) AMendiola	(HCruz for) MHoncharik
DATE	07/23/2013	07/23/2013	07/25/2013	07/25/2013	07/25/2013

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Technical Specifications Task Force Mailing List  
cc:

Technical Specifications Task Force  
11921 Rockville Pike  
Suite 100  
Rockville, MD 20852  
Attention: Brian Mann  
E-mail: [brian.mann@excelservices.com](mailto:brian.mann@excelservices.com)

Robert A. Slough  
Comanche Peak Nuclear Power Plant  
P. O. Box 1002, Mail Code A08  
Glen Rose, Texas 76043  
E-mail: [robert.slough@luminant.com](mailto:robert.slough@luminant.com)

Richard A. Loeffler  
Monticello Nuclear Generating Plant  
2807 West County Road 75  
Monticello, MN 55362-9637  
E-mail: [richard.loeffler@xenuclear.com](mailto:richard.loeffler@xenuclear.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)

Otto W. Gustafson  
Entergy Nuclear Operations, Inc.  
Palisades Nuclear Power Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043  
E-mail: [ogustaf@entergy.com](mailto:ogustaf@entergy.com)

**Attendees at the Part 9900 Meeting**

**October 18, 2012**

<b>Name</b>	<b>Organization</b>
Robert Elliott	NRC/Office of Nuclear Reactor Regulation (NRR) / Division of Safety Systems (DSS) / Technical Specifications Branch (STSB)
Carl Schulten	NRC/NRR/DSS/STSB
Kristy Bucholtz	NRC/NRR/DSS/STSB
Gerald Waig	NRC/NRR/DSS/STSB
Shaun Anderson	NRC/NRR/DSS/STSB
Khadijah Hemphill	NRC/NRR/DSS/STSB
Theodore Tjader	NRC/Office of New Reactors Regulation (NRO)
Brian Mann	Technical Specifications Task Force (TSTF)
Rick Loeffler	TSTF
Rob Slough	TSTF
Otto Gustafson	TSTF
Peter LeBlond	LeBlond & Associates
Myron Baird	Columbia
Mitch Guth	Florida Power & Light Turkey Point
Timothy Kobetz	NRC/NRR/DIRS
Nicole Warnek	Region I
Craig Harbuck	NRC/NRO
Hein Le	NRC/NRO
Matthew Hamm	NRC/NRR/DSS/STSB

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