

September 12, 2013

MEMORANDUM TO: Anthony J. Mendiola, 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 19, 2012, PUBLIC MEETING WITH
THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)

On October 19, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff met with the 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 5, 2012, are available in the Agencywide Documents Access and Management System (ADAMS) at Package Accession No. ML12275A040.

Technical Issues

Status of NRC Staff Review of Risk Informed TSTF Initiative 6 Travelers: TSTF-426, TSTF-538, and TSTF-540

Ms. Leta Brown, NRC, and other staff from the Accident Dose and Assessment Branch (AADB) discussed and asked questions related to the meteorology and X/Q values in TSTF-426. Table 4.3-1 of TSTF-426 contains values for bounding and realistic X/Q. The NRC staff wanted to know what the term "realistic" meant. They also questioned where the values came from used in the topical report (TR) WCAP-16125, "Justification for Risk-Informed Modifications to Selected Technical Specifications for Conditions Leading to Exigent Plant Shutdown." Mr. Brian Mann, TSTF, commented that Ms. Brown's questions seem similar to questions asked in the requests for additional information (RAIs) on the TR, which were answered by the vendor in November 2004. Ms. Brown clarified that her questions were different and the RAI answers provided did not address her concerns.

Mr. Mark Blumberg, NRC, commented that the methodology used in TSTF-540 seems to be different from the TR WCAP-16125 methodology. Mr. Brian Mann, TSTF, said that the TSTF followed the same methodology for the Travelers. Mr. Blumberg commented that to the NRC staff, the methodology seems different. Mr. Blumberg also commented that even if the probabilistic risk assessment (PRA) is "good," the Traveler still needs to meet the regulations at Title 10 of the *Code of Federal Regulations* (10 CFR) Part 100, General Design Criterion (GDC) 19 and 10 CFR 50.37. Mr. Blumberg commented that TSTF-540 uses a surrogate for

the control room habitably doses and therefore a direct comparison to the regulations cannot be made.

Mr. Jerry Dozier, NRC, commented that the Travelers reference 10 CFR 50.36. AADB staff typically does deterministic reviews and are used to reviewing the impacts are against 10 CFR 50.67.

Mr. Brian Mann, TSTF, described the differences between the three Travelers. TSTF-538 and TSTF-540 make changes to the technical specifications (TS) for systems that do not affect core damage frequency (CDF) and large early release frequency (LERF). TSTF-426 does apply to systems that affect CDF and LERF.

The TSTF members commented that the NRC staff's questions are on the previously-approved TR WCAP-16125, not on the Travelers. The NRC staff stated that they needed to raise this to management for a decision on whether or not to issue RAIs on an already approved TR. Subsequent to the meeting it was determined that the questions raised were not safety significant, and therefore, no RAIs were issued on the previously approved TR.

Status of TSTF-412, "Provide Actions for One Steam Supply to Turbine Driven AFW/EFW [Auxiliary Feedwater/Emergency Feedwater] Pump Inoperable"

The NRC staff from the Balance-of-Plant branch (Mr. Stanley Gardocki) has concerns with TSTF-412 related to the TS Required Actions that allow operation with a loss of safety function. Mr. Brian Mann, TSTF, suggested that the NRC send a letter to the TSTF stating that we are considering withdrawing approval and give them an opportunity to respond. Mr. Mann also requested that the letter state that it's a change in NRC staff position. The NRC staff needs to research the history and documentation further before making any determinations with respect to suspending/withdrawing approval of the Traveler.

Status of BWROG Letter Requesting Changes to Enforcement Guidance Memorandum (EGM) EGM 11-003

Mr. Carl Schulten, NRC, provided an update that the NRC staff has revised the EGM and it is in the concurrence process. It is currently with Regions for review. If there are no issues from NRC's Office of General Counsel, then the EGM may be issue by end of 2012. The NRC staff will evaluate if the associated Regulatory Information Summary (RIS) needs to be revised.

Discussion of Mode 3 End State Traveler for Pressurized Water Reactors

Mr. Brain Mann, TSTF, commented that during the review of TSTF-432 (the Mode 4 End State Traveler), the NRC staff of the Nuclear Performance and Code Review Branch (SNPB) felt that Mode 3 End State would be better. Mr. Mann asked if the NRC staff still want the TSTF to pursue a Traveler for this issue. Mr. Robert Elliott, NRC, answered that yes we do. It was decided that a pre-submittal meeting will be held and the following NRC branches should be included: SNPB, Reactor Systems, PRA, and Division of Operator Reactor Licensing.

Proposal to Create Expanded Bases in Standard TS (STS) NUREGs

The TSTF members discussed creation of a Bases Section for Section 1.0 in the STS and all the regulatory documents that apply to TS. This Bases Section would not be something that any plant would implement. The NRC staff agreed that this was a good idea and that it would support knowledge management. The exact form of the expanded Bases will be discussed later.

Status of TSTF-493 Implementation Guidance

The NRC staff commented that the Implementation Guidance is in concurrence with the Technical Specifications Branch (STSB). STSB will work with Mr. David Rahn, NRC, to resolve comments by first week of November 2012. Mr. Robert Elliott, NRC, commented that he wants to get this issued to the industry and have a discussion (workshop to agree with the criteria) and get a pilot plant to test drive it.

Process Issues

Applicability of LIC-109, "Acceptance Review Procedures," to Travelers

TSTF proposes that LIC-109 be revised to include Travelers in the procedure, similar to how TRs are included. The NRC staff said they will take this idea under consideration.

Status of Draft RIS on the Relationship Between the GDC and TS

Mr. Carl Schulten, NRC, is in resolving public comments. The target is to issue the final RIS by the end of 2012.

Active Traveler Review Status (see TSTF handout, "Active Traveler Status Report," in ADAMS at Accession No. ML12303A035)

TSTF-426, "Revise or Add Actions to Preclude Entry into LCO [Limiting Condition for Operation] 3.0.3 - RITSTF Initiatives 6b & 6c"
See discussion above.

TSTF-454, "Extend PCIV [Primary Containment Isolation Valve] Completion Times (NEDC 33046)"
The NRC staff plans to provide RAIs by .October 31, 2012.

TSTF-523, "Generic Letter 2008-001, Managing Gas Accumulation"
The target date for issuance of the *Federal Register* Notice for Public Comment is February 8, 2013.

TSTF-529, "Clarify Use and Application Rules"
A separate meeting was held on October 16, 2012. See meeting summary in ADAMS at Accession No. ML12303A033.

TSTF-530, "Clarify SR [Surveillance Requirement] 3.0.3 to be Consistent with Generic Letter 87-09"

The NRC staff is preparing a non-acceptance letter (with the opportunity to supplement); target date for letter is October 31, 2012.

TSTF-531, "Revision of Specification 3.8.1, Required Actions B.3.1 and B.3.2"

The NRC staff target date for RAI letter is October 31, 2012.

TSTF-534, "Clarify Application of Pressure Boundary Leakage Definition"

The TSTF responded to non-acceptance letter on September 4, 2012 (ADAMS Accession No. ML12248A352). The NRC staff plans to respond to positions in supplement letter by November 30, 2012.

TSTF-535, "Revise Shutdown Margin Definition to Address Advanced Fuel Designs"

The target date for issuance of the *Federal Register* Notice for Public Comment is October 31, 2012.

TSTF-537, "Increase CIV [Containment Isolation Valve] Completion Time: Update to TSTF-373"

The NRC staff is preparing an acceptance letter; target date for letter is October 31, 2012.

TSTF-538, "Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF Initiatives 6b & 6c"

See discussion above.

TSTF-540, "Provide Completion Time in lieu of Immediate Shutdown (RITSTF Initiative 6)"

See discussion above.

TSTF Traveler Review Priority (see TSTF handout, "Traveler Review Priority," in ADAMS at Accession No. ML12303A036)

Future Planning

Next quarterly public meeting between the TSTF and NRC is planned for January or early February 2013.

There were no questions received from the public.

Project No. 753

Enclosure:

Attendees at the NRC and TSTF Meeting

cc: See next page

TSTF-530, "Clarify SR [Surveillance Requirement] 3.0.3 to be Consistent with Generic Letter 87-09"

The NRC staff is preparing a non-acceptance letter (with the opportunity to supplement); target date for letter is October 31, 2012.

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TSTF-538, "Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF Initiatives 6b & 6c"

See discussion above.

TSTF-540, "Provide Completion Time in lieu of Immediate Shutdown (RITSTF Initiative 6)"

See discussion above.

TSTF Traveler Review Priority (see TSTF handout, "Traveler Review Priority," in ADAMS at Accession No. ML12303A036)

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Package: ML12303A039; Summary: ML12303A042; TSTF handouts: ML12303A036 and ML12303A035;
Notice: ML12270A400; Agenda: ML12270A335 *concurred via e-mail **NRC-001**

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

October 19, 2012

Name	Organization
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
Kadijah Hemphill	NRC/NRR/DSS/STSB
Gerald Waig	NRC/NRR/DSS/STSB
Ravinder Grover	NRC/NRR/DSS/STSB
Michelle Honcharik	NRC/NRR/DPR/Licensing Processes Branch
Jerry Dozier	NRC/NRR/Division of Risk Assessment (DRA)/ Accident Dose Branch (AADB)
Leta Brown	NRC/NRR/DRA/AADB
*Mark Blumberg	NRC/NRR/DRA/AADB
Stanley Gardocki	NRC/NRR/Division of Safety Systems (DSS)/Balance-of-Plant Branch (SBPB)
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
*Wendy Croft	TSTF
Jana Bergman	Scientech
Tony Browning	TSTF
Richard Rusin	GEH
James Andrachek	Westinghouse Electric Company
Frank Mascitelli	TSTF/Exelon

*Participated via telephone conference

ENCLOSURE