

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, Senior Project Manager */RA/*
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JULY 18, 2013, QUARTERLY MEETING WITH
THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)

On July 18, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff met with the Technical Specifications Task Force (TSTF) representatives to discuss technical issues and administrative processes related to TSTF Travelers. The meeting was held at NRC offices in Three White Flint North, 11601 Landsdown Street, North Bethesda, Maryland 20852. A list of the meeting attendees is enclosed. The meeting notice and agenda dated July 3, 2013, are available in the Agencywide Documents Access and Management System (ADAMS) at Package Accession No. ML13183A439.

Fukushima-Related Impact on NRC Staff Activities

Mr. Anthony Mendiola, NRC, discussed the impacts that Fukushima-Related effort was having on the workload in the Office of Nuclear Reactor Regulations (NRR). He explained that all work in NRR has been prioritized on a scale from 1-5; with 5 being the lowest priority. Traveler reviews are a priority 4. Eighty percent of the work in NRR is priority 4 or 5. The TSTF asked when work would resume to normal. Mr. Robert Elliott, NRC, commented that work will resume to normal when all of the Fukushima-Related work and effects from sequestration have ended. Mr. Mendiola added that his staff is attempting to line up contracts with the Department of Energy laboratories to handle Topical Report reviews. This would free up NRR staff to work on other tasks (i.e., Travelers, etc.). Mr. Mendiola also commented that specific technical areas are impacted more, for example, reactor systems, spent fuel pool, balance of plant, and instrumentation and control. Mr. Elliott added that containment is impacted too. TSTF members asked if a Traveler could be assigned a higher priority. Mr. Elliott, NRC, explained that a Traveler could be given a priority higher than 4. The TSTF should highlight/flag the Traveler to the NRC staff and provide the basis for the elevation of priority. Brian Mann, TSTF, took an action item to re-evaluate the priority (not routine) and submit a letter laying out reasons why certain Travelers should be a higher priority.

Status of NRC Response to September 4, 2012, TSTF Letter, "Response to NRC Request for Supplemental Information and Withdrawal Regarding TSTF-534, Revision 0, 'Clarify Application of Pressure Boundary Leakage Definition'"

Mr. Timothy Lupold, NRC, explained what happens when a plant has a leak that would be considered reactor coolant pressure boundary (RCPB) leakage. The NRC staff interprets the Technical Specifications (TS) as not allowing any RCPB leakage. However, the leak can be removed from the RCPB by isolating it. Once the leak is isolated, it is no longer part of the RCPB. Section 50.2 of Title 10 of the *Code of Federal Regulations* (10 CFR) defines the RCPB. It states that the second of 2 valves forms the boundary. Therefore, when it is isolated any leakage through those valves is not RCPB leakage; it is now reactor coolant system (RCS) leakage.

Mr. Mann, TSTF, commented that the TSTF agreed completely. If there are 2 valves isolating the leak, then it's not RCPB leakage. It's RCS leakage. Mr. Elliott, NRC, suggested that a possible strategy would be to make a RCS leakage bases change (for industry) and put it in the operability guidance (for inspectors) to document. Mr. Mann, TSTF, took an action to send the bases change to the NRC for information (not formal review). It would be a T-Traveler. Mr. Carl Schulten, NRC, and Mr. Elliott, NRC, discussed where in NRC documents would be the appropriate place to include this clarification.

The NRC staff and TSTF members all agreed this may not solve every problem, but it will clarify what the TS really means. Based on the discussion today, a formal written response to the TSTF's letter dated September 4, 2012, is no longer needed.

Active Traveler Review Status (see TSTF handout, "Active Traveler Status Report," in ADAMS at Accession No. ML13199A255)

TSTF-454, "Extend PCIV Completion Times (NEDC-33046)"

TSTF plans to respond to requests for additional information (RAIs) by September 30, 2013.

TSTF-523, "Generic Letter 2008-001, Managing Gas Accumulation"

The *Federal Register* Notice for Public Comment was signed out on July 9, 2013. It should be published before the end of the month.

TSTF-529, "Clarify Use and Application Rules"

All Change Numbers below refer to the change numbers from NRC staff handout (ADAMS Accession No. ML13171A321). Mr. Brian Mann, TSTF, stated that the TSTF will revise the Traveler based on the NRC staff handouts and the discussion today.

a) Change #1 proposed to add two new references to the LCO 3.0.2 bases. One of the references is a very old internal NRC memo. The TSTF agreed to not include it. The other reference is the Part 9900 guidance, which does talk a lot about time of discovery, which is why the TSTF proposed to include it as a reference. Mr. Carl Schulten, NRC, explained that the NRC staff does not think it should be a reference because there is no relationship between inspector guidance and TS. The TS should stand alone. Mr. Brian Mann, TSTF, suggested removing the reference and including some of the wording in the basis to clarify. It was agreed that the reference would be removed and instead the TSTF would provide an example or discussion on completion time in Section 1.0.

- b) Change #3 was a minor change to Limiting Condition for Operation (LCO) 3.0.4a to avoid confusion. Mr. Carl Schulten, NRC, commented that for the NRC staff the threshold to change LCO 3.0 is very high. Mr. Brian Mann, TSTF, explained that the TSTF bundled many changes to address concerns about licensee's not adopting this one particular change. It was agreed that the TSTF would revise the Traveler to change bases only and not the LCO.
- c) Change #5 – Rob – don't want to use resources to fix a problem that isn't broke. Brian – many people are using Calvert response. Rob – could reference Calvert letter in the bases.
- d) Change #12 was proposed to address situations when Surveillance Requirement (SR) 3.0.3 Surveillances were never performed. The longer since a surveillance test has been performed, the higher the bar to prove operability. The NRC staff recommended the TSTF use the term "objective evidence." It was agreed that surveillances that have never been performed will be lumped in with long time since performed category.

TSTF-531, "Revision of Specification 3.8.1, Required Actions B.3.1 and B.3.2"
Request for Additional Information (RAI) responses received. The NRC staff has not reviewed the RAI Responses yet. Earliest that the NRC staff will be ready to discuss will be September.

TSTF-536, "Resolve CE Digital TS Inconsistencies Regarding CPCs and CEACs"
The NRC staff from the Instrumentation and Controls branch in the Division of Engineering is considering non-acceptance, because there is no technical justification. Mr. Brian Mann, TSTF, explained that the change is a TS change, not a technical change. A telephone call will be scheduled for later to discuss further, once staff has had more time to review.

TSTF-537, "Increase CIV Completion Time: Update to TSTF-373"
The TSTF plans to respond to RAIs by September 30, 2013.

TSTF-538, "Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF Initiatives 6b & 6c"
The NRC staff is preparing a non-acceptance letter. Issuance has been delayed due to higher priority work.

TSTF-540, "Provide Completion Time in lieu of Immediate Shutdown (RITSTF Initiative 6)"
The NRC staff is preparing a non-acceptance letter. Issuance has been delayed due to higher priority work.

TSTF Traveler Review Priority (see TSTF handout, "Traveler Review Priority," in ADAMS at Accession No. ML13199A268)

Mr. Brian Mann, TSTF, explained why the high priority-Travelers were categorized as high. TSTF-538 and TSTF-540 are risk-informed initiatives, TSTF-523 is in response to a Generic Letter, and TSTF-531 is a safety issue.

Technical Issues

Spent Fuel Pool Criticality Issue

Mr. Brian Mann, TSTF, opened the discussion by clarifying that the Nuclear Energy Institute (NEI) Criticality Task Force is the primary point of contact for this issue, not the TSTF. The NEI document, NEI 12-16, is under NRC staff review. The TSTF met with the NEI Criticality Task Force and reviewed NEI 12-16. As written, there would be problems attempting to fit the NEI 12-16 requirements/actions into the standard required actions format/structure of the TS. The two industry groups discussed an administrative controls program, but any actions that licensee's would end up taking would need prior NRC approval to do. Therefore, these actions could not be put into TS. The TSTF members support what is in NEI 12-16.

Mr. Kent Wood, NRC, summarized the issue for clarity. The TSTF feels they don't have any actions, because any actions that the licensee would take would need prior NRC staff approval and therefore can't be in TS as a required action. Mr. Kent Wood, NRC, the NRC staff was looking at it as two parallel paths and didn't want to wait 2 years to start looking at TS changes. The monitoring program needs to be in TS and thought something similar to the program for steam generator (SG) tube monitoring might work. Mr. Brian Mann, TSTF, the TSTF members don't want to be working at cross purposes with another industry group, because industry is not proposing a TS.

Discussion of Operability and Functionality Guidance Proposed Revisions

Mr. Robert Elliott, NRC, explained that the staff has finished the draft of IMC Part 9900 revision (which will be renumbered as IMC 0326). The Regions have not seen it yet. The NRC staff has not only changed the document, but they've also provided a response to TSTF requests in letter (as if comments had been received from *Federal Register* Notice). The NRC staff plans to have a draft issued before the November quarterly meeting.

Status of Room Cooler Traveler

Mr. Robert Elliott, NRC, Wolf Creek was recently granted notice of enforcement discretion (NOED) for inverters for an inoperable non-TS room cooler. Mr. Rob Slough, TSTF, commented that there has got to be better way than having a utility shutdown during peak demand because of an inoperable air conditioner. Mr. Matt Hamm, NRC, commented that these components/systems weren't designed to be overhauled online. It was agreed that a meeting will be scheduled to discuss further; NRC staff from containment and ventilation branch should be involved in the meeting.

Status of BWR Reactor Pressure Vessel Water Inventory Control Traveler (TSTF-542)

Mr. Brian Mann, TSTF, commented that the TSTF has incorporated a lot of the NRC staff comments provided during the February meeting. They've also prepared a comment disposition document. The latest draft of TSTF-542 is currently out for industry review due back by end of July. Then the TSTF will provide a draft Traveler to the NRC by middle of August, at which time another pre-submittal meeting will be scheduled.

Mr. Robert Elliott, NRC, informed the TSTF that the EGM will be extended to December 31, 2015.

Status of Traveler to Incorporate OMN-20 and Revise the TS Inservice Testing Program (TSTF-545)

The TSTF will submit a first draft to the NRC in early August. The Traveler will include a model relief request (RR), which is something new. RR part of the Traveler will be bracketed, because some plants may already have been granted relief. The NRC staff discussed having an internal meeting with staff from the Office of the General Counsel and management from the Division of Operator Reactor Licensing, so they can determine if and who should attend the pre-submittal meeting with the TSTF.

Future Planning

Future Traveler submittals

- TSTF-541, "Add Exceptions to Surveillance Requirements When the Safety Function is being Performed"
- TSTF-542, "Reactor Pressure Vessel Water Inventory Control (RPV WIC)"
- TSTF-545, "10 CFR 50.55a(f) Alternative IST Testing Request and IST Program Revision"
- TSTF-546, "Add Allowance to Delay Entry into RPS Actions During APRM Gain Adjustments"
- TSTF-547, "Clarification of Rod Position Requirements."

Next quarterly public meeting between the TSTF and NRC is scheduled for November 21, 2013.

There were no questions received from the public.

Project No. 753

Enclosure:

Attendees at the NRC and TSTF Meeting

cc: See next page

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ADAMS Accession Nos.: Package -ML13199A403; Summary - ML13203A164; TSTF Handouts -ML13199A255 and ML13199A255; NRC Handouts: ML13171A321, ML13179A379, and ML13192A337; Notice - ML13199A255

OFFICE	PLPB/PM	PLPB/LA	STSB/BC	PLPB/BC	PLPB/PM
NAME	MHoncharik	DBaxley	RElliott	AMendiola	MHoncharik
DATE	08/1/2013	07/ 30 /2013	09/5/2013	09/11/2013	09/12/2013

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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

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

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

Wendy E. Croft
Exelon Nuclear
200 Exelon Way, Suite 340
Kennett Square, PA 19348
E-mail: 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

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

July 18, 2013

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
Matthew Hamm	NRC/NRR/DSS/STSB
Kadijah Hemphill	NRC/NRR/DSS/STSB
Gerald Waig	NRC/NRR/DSS/STSB
Ravinder Grover	NRC/NRR/DSS/STSB
Anthony Mendiola	NRC/NRR/DPR/Licensing Processes Branch (PLPB)
Michelle Honcharik	NRC/NRR/DPR/PLPB
Timothy Lupold	NRC/NRR/Division of Engineering (DE)/ Component Performance, NDE, & Test Branch (CPNB)
Keith Hoffman	NRC/NRR/DE/CPNB
Kent Wood	NRC/NRR/Division of Safety Systems (DSS)/Reactor Systems Branch (SRXB)
Jennifer Gall	NRC/NRR/DSS/SRXB
John Hughey	NRC/NRR/Division of Operating Reactor Licensing
Eileen McKenna	NRC/Office of New Reactors Regulation (NRO)
Theodore Tjader	NRC/NRO
Brian Mann	Technical Specifications Task Force (TSTF)
*Rick Loeffler	TSTF
Rob Slough	TSTF
Otto Gustafson	TSTF
Wendy Croft	TSTF

ENCLOSURE