

History of COLR References

- I. 1999-12-15
 - A. In a letter from Mr. Stuart A. Richards (NRC) to Mr. James F. Mallay (Siemens Power Corporation) dated December 15, 1999, entitled "Acceptance for Siemens References to Approved Topical Reports in Technical Specifications," the NRC stated that it is acceptable for the references to Topical Reports in ITS Section 5.6.5, COLR, to give the Topical Report title and number as long as the complete citation is given in the COLR.
- II. 2000-03-13
 - A. TSTF submits TSTF-363, "Revise Topical Report references in ITS 5.6.5, COLR."
- III. 2000-04-12
 - A. NRC approves TSTF-363.
- IV. 2001-06
 - A. TSTF-363 incorporated in ISTS Revision 2.
- V. 2009-11-02
 - A. The NRC transmitted a letter to the TSTF stating they had concerns with TSTF-363, 408, and 419, and requested a meeting.
- VI. 2010-01-28
 - A. TSTF distributed white paper, "Analysis of NRC Position Regarding TSTF-363, 408, and 419."
 - B. Bob Tjader of NRO stated that he reviewed TSTF-363 and the basis for relocation of the Topical Report details to the COLR was based on the Topical being an NRC approved method and that it was his opinion is this basis is still valid.
 - C. The NRC emphasized that the November 2 letter stated that the NRC would not process amendment requests to adopt TSTF-363, 408, and 419 and did not discuss the effect on plants that had already adopted those Travelers.
 - D. **NRC acknowledged that the backfit rule might apply if NRC asked licensees with TSTF-363 approved to add revisions and dates to new methodologies added to the TS COLR list.**
- VII. 2010-04-28
 - A. The NRC had not reviewed the white paper provided at the January 28, 2010 TSTF/NRC public meeting.
 - B. NRC stated that there had been a management change in the Reactor Systems Branch (RSB) and the previous management had been driving the issue.
 - C. The TSTF stated that the NRC had sent two letters describing some of the staff's concerns, but other concerns had been verbally described at several meetings. The TSTF requested that NRC provide, in writing, a description of the remaining NRC concerns so that the TSTF can respond. The NRC agreed to do so.
 - D. Tai Haung of the RSB discussed the staff concerns, but it was unclear whether the RSB continued to oppose the changes in TSTF-363, 408, or 419.

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- E. **It appears that the NRC is going to accept the addition of a new methodology to the ANO COLR list without revisions and dates provided that each listed methodology also state the Specifications supported by it.**
- VIII. 2010-07-05
- A. Discussed industry white paper on TSTF-363 provided at the January 28, 2010 public meeting.
 - B. TSTF requested NRC document their concerns with TSTF-363, 308, and 419.
- IX. 2010-11-04
- A. Discussed industry white paper on TSTF-363 provided at the January 28, 2010 public meeting.
 - B. The NRC stated that the NRC Reactor Systems Branch staff had developed an Action Plan which would allow licensees to adopt TSTF-363, but the Technical Specifications Branch had not seen it.
- X. 2011-02-09
- A. At the February 9, 2011 TSTF/NRC meeting, the NRC responded to the white paper provided at the January 28, 2010 public meeting.
 - 1. "The NRC is still discussing how to address plants that have previously been approved to remove the revision numbers and dates. Plants that have TSTF-363 approved should continue with the current COLR requirements (e.g., **not include revision numbers and dates in new LARs that affect the list**)."
- XI. All TSTF status reports to the industry from February through August state our understanding as, "Plants that have previously removed the revision numbers and dates from the COLR or PTLR are not affected (i.e., **will not be required to include revision numbers and dates in new license amendment requests that affect the list**).
- XII. 2011-05-12
- A. On May 12, the NRC stated that the letter must undergo Congressional Review Act screening. The letter is expected at the end of August.
- XIII. 2011-08-04
- A. NRC issues letter to TSTF stating the NRC will no longer approve LARs to adopt TSTF-363.
 - B. The letter states, "The NRC staff does not intend to backfit licensees that have these travelers already in their TS. There is not a substantial increase in the overall protection of the public health and safety to be derived from backfitting licensees that have already adopted these travelers. A desire for additional clarity in the safety analysis is not indicative of an immediate safety concern. Therefore, backfitting would not be justified under Title 10 of the Code of Federal Regulations Section 50.109 because the safety benefit is not supported by the financial costs. **As a result, these changes will not impact plants that already have TSTF-363, or previous versions of TSTF-408 or TSTF-419, approved and implemented in their plant-specific TS.**"

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- C. The letter also states, "As discussed during the February 9, 2011, meeting with the TSTF, this situation is irregular in that the NRC staff has never changed the STS NUREGs without that change being made as a result of a traveler. Therefore, we agreed to provide an opportunity for the TSTF to submit travelers to make these changes to the STS. The travelers would need to be submitted in a timely fashion to allow for them to be used as part of the STS Revision 4 which is currently in process."

XIV. 2011-09-16

- A. The TSTF provided TSTF-533-T to the NRC on September 16, 2011. TSTF-533-T will be incorporated in ISTS Revision 4. Issuance of Revision 4 constitutes NRC acceptance of the changes.
1. In the distribution of the Traveler to the industry for review, dated August 12, 2011, (one month after the NRC August 4 letter) the TSTF states, "It is important to note that licensees that have already adopted TSTF-363, -408, or -419 are unaffected by the change in NRC approval for these Travelers, and they **will not be required to add revision numbers and dates to the COLR or PTLR methodology lists if the lists are modified or if new methodologies are added.**"

XV. 2011-10-26

- A. On October 27, 2011, Gerry Waig (NRC) sent an e-mail to Brian Mann (TSTF) "incorporating staff's position regarding the reviewer's note." Rob Elliott, Michelle Honcharik, and Ben Parks (Reactor Systems) were on copy. A copy is attached.
- B. The proposed Reviewer's Note stated:
Licensees that have received prior NRC approval to relocate Topical Report revision numbers and dates to licensee control need only list the number and title of the Topical Report, and the COLR will contain the complete identification for each of the Technical Specification referenced Topical Reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements). See NRC ADAMS Accession No: ML110660285 for details.
- C. On October 27, 2011, Brian Mann responded that the wording was acceptable.

XVI. 2011-10

- A. Revision 4 of the ISTS NUREGs was issued incorporating the staff's proposed Reviewer's Note.

XVII. 2014-07

- A. At the July 10, 2014 TSTF/NRC meeting, the TSTF raised the issue that Prairie Island and Wolf Creek had both submitted LARs to revise the list of methodologies in the TS Core Operating Limits Report (COLR). Both plants had received e-mail RAIs from the staff requesting that they add dates and revision numbers to the added references. Both plants had previously received approval of LARs based on TSTF-363, "Revise Topical Report references in ITS 5.6.5, COLR."

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- B. NRC stated that it was his understanding that the NRC agreed that revision numbers and dates did not have to be added to the existing references but did have to be added to new references. He has been advising Reactor Systems to request this information on LARs. There is disagreement within the NRC.
- C. The TSTF agreed to research the meeting summaries of the discussions on this issue and provide any relevant information to the NRC.
- D. NRC to hold an internal meeting to reach agreement.