

April 28, 2015

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/  
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF FEBRUARY 5, 2015, QUARTERLY MEETING WITH THE  
TECHNICAL SPECIFICATIONS TASK FORCE (TSTF)

On February 5, 2015, 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 One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852. A list of the meeting attendees is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML15104A572. The meeting notice and agenda dated January 20, 2015, are available in ADAMS at Package Accession No. ML15015A545.

Status of Industry Guidance on Nonconservative Technical Specifications:

TSTF has incorporated all comments and plans to publish the guidance as a TSTF General Guidance document for industry use. The industry will also submit the guidance through NEI for NRC staff endorsement.

TSTF Concerns with NRC Staff Treatment of Model Applications and Model Safety Evaluations (SEs):

In light of recent issues adopting and handling of previously-approved Travelers, the TSTF suggested that the NRC develop a process to formalize (i.e., have a procedure) how we handle situations that arise in the future. Currently, if a question is raised during an LAR review to adopt a previously-approved Traveler, the licensee who submitted the LAR is expected to address what may be generic issues. The NRC staff should not expect individual licensees to handle questions on generic concerns. The author of the original document (Traveler or Topical Report) should be involved in the resolution and include the extent of condition in the evaluation.

Matt Hamm (NRC) commented that it would be useful to have a section in the Traveler (and SE) to delineate the licensing bases requirements needed for a plant to adopt a Traveler - something clear and concise perhaps in tabular form. All present agreed this was a good idea and we will discuss in further detail at the next meeting.

Status of Regulatory Issue Summary (RIS) Withdrawing RIS 2005-20:

Caroline Tilton (NRC) provided an update that the RIS will go into concurrence next week. NRC plans to issue it in April 2015.

NRC Response to TSTF Proposed Resolution of NRC Concerns with TSTF-471, TSTF-286, and TSTF-51

The TSTF provided a revised draft document (ADAMS Accession No. ML15041A062). The revision addressed comments from the reactor systems branch (SRXB). Matt Hargrove (NRC/SRXB) stated that their concerns/comments were adequately addressed with the changes.

Mark Blumberg (NRC) gave verbal feedback on his areas of concern and subsequent to the meeting provided a written version (see Enclosure).

Margaret Chernoff (NRC) technical specifications branch is going to take a look at the Regulatory Commitment used in TSTF-51 to ensure that the commitment is truly commitment or does it need to be elevated to an obligation.

Discussion of TSTF Draft Letter Clarifying Information Requirements for TSTF-425 Submittals:

The TSTF handed out a revised draft letter clarifying the TSTF-425 requirements (ADAMS Accession No. ML15041A061). Robert Elliott (NRC) stated that he and Hossein Hamzehee (NRC) would meet to discuss further and provide comments to the TSTF by the end of February.

Resolution of NRC Questions on TSTF-412, "Provide Actions for One Steam Supply to Turbine Driven AFW/EFW Pump Inoperable"

Issue was not discussed because the appropriate NRC technical staff were not available.

Response to TSTF Letter Addressing NRC Concerns with Travelers that Reference Regulatory Guide (RG) 1.182.

NRC staff letter is in concurrence and should be issued by 2/13/15.

Status of Guidance on TSTF-493 Adoption (Option A and Option B):

The TSTF will submit a letter in mid-March proposing revisions to the Model Application and Model SE, but not a revision to the Traveler itself.

Results of NRC Internal Meeting Regarding Travelers that Contain Commitments:

Robert Elliott (NRC) stated that he's met with the Office of General Counsel (OGC) and explained to them that the commitment in TSTF-423 should remain a commitment and not be a license condition.

Margaret Chernoff (NRC) is reviewing all other commitments in approved Travelers to determine any should be raised to a licensing obligation. Once the NRC has completed its review, we will respond in writing to the TSTF.

In the meantime, the TSTF will also tell licensees to evaluate any commitments in an approved Traveler before submitting the LAR to adopt it.

Michelle Honcharik (NRC) questioned how a consolidated line item improvement process (CLIP) Traveler would be affected by a previous commitment that is made into a licensing obligation. No agreement was reached.

Discussion of the February 3 NEI/NRC Meeting on TSTF-425 and TSTF-505:

During a plant-specific review to adopt TSTF-505, questions were raised regarding the legality of the Model No Significant Hazards Consideration (NSHC). Once the NRC staff has come to agreement, we will share the results with the TSTF and evaluate if anything needs to be changed generically for TSTF-505.

Active Traveler Review Status:

The TSTF handed out a listing of all Travelers currently under review (ADAMS Accession No. ML15041A060.) Updates to the schedules for each Traveler were discussed as detailed below.

TSTF-454, Rev. 2, "Extend PCIV Completion Times (NEDC-33046)"

TSTF to provide RAI responses by 2/27/2015

TSTF-529, Rev. 1, "Clarify Use and Application Rules"

Draft RAIs were discussed. NRC to provide final RAIs by 2/27/2015.

TSTF-531, Rev. 0, "Revision of Specification 3.8.1, Required Actions B.3.1 and B.3.2"

TSTF to submit a Traveler by 3/31/2015 in response to RAIs

TSTF-537, Rev. 0, "Increase CIV Completion Time; Update of TSTF-373"

NRC to provide revised schedule dates by 2/27/2015

TSTF-541, Rev. 0, "Add Exceptions to Surveillance Requirements When the Safety Function is Being Performed"

NRC to provide Acceptance for Review letter by 2/27/2015

TSTF-542, Rev. 0, "Reactor Pressure Vessel Water Inventory Control"

TSTF to provide RAI responses by 2/27/2015

TSTF-545, Rev. 0, "TS Inservice Testing (IST) Program Removal"

The TSTF requested the NRC extend submittal period for EGM 2012-01 from 4 months to 12 months.

NRC to issue the Notice for Comment by 6/15/2015

TSTF-547, Rev. 0, "Clarification of Rod Position Requirements"

NRC to issue the Notice for Comment by 5/15/2015

TSTF-551, Rev. 0, "Address Transient Secondary Containment Conditions"

NRC to provide Acceptance for Review letter by 2/27/2015

TSTF Traveler Review Priority:

The TSTF handed out a listing of the Travelers under review and the corresponding priority (ADAMS Accession No. ML15041A063).

Industry Comments on Proposed NRC RIS on Pressure Boundary Leakage:

TSTF ensured that NRC staff were aware of the letter they submitted (ADAMS Accession No. ML15028A128). Topic will be discussed further once the draft RIS issued for public comment.

Motor Operated Valve (MOV) Surveillance Requirements (SR) with Frequency Controlled by IST Program:

Michael Farnan (NRC) explained the background and that there appears to be a disconnect between the ASME Code and TS.

Robert Elliott (NRC) stated that the NRC staff will do an extent of condition to determine if this is an issue needing further action. The NRC staff will follow up with the TSTF once they've determined what needs to be done.

Status of Revision to Inspection Manual Chapter (IMC)-0326, Appendix C.13:

Caroline Tilton (NRC) provided status that the revision will go into final concurrence next week. The NRC agreed to share a draft of the revision with the TSTF before putting it into final concurrence. Subsequent to the meeting, the draft was e-mailed to the TSTF (ADAMS Accession No. ML15041A670).

Discuss a PWR Mode 3 End State Traveler:

The TSTF members inquired if the NRC staff was still interested in a Mode 3 End State Traveler. They also asked if the Traveler was submitted in 2016, would the NRC staff have the resources available to review it then.

Robert Elliott (NRC) said yes the NRC is still interested, but he would confirm this with the appropriate technical staff branch chiefs (Hossein Hamzehee and Chris Jackson).

Future Traveler Submittal and Next Meeting:

TSTF-552, "Diesel Generator Frequency and Voltage Tolerances (WCAP-17308)"  
(following draft SE issuance of the Topical Report WCAP-17308)

Thursday, April 16, 2015

There were no public comments.

Project No. 753

cc: See next page

Enclosure:

NRC Comments on the TSTF's Preliminary Response to NRC Concerns on TSTF-51, 286, and  
TSTF-471

## **NRC Comments on the TSTF's Preliminary Response to NRC Concerns on Travelers TSTF-51, TSTF-286, and TSTF-471**

### **Discussion of Dose Issues**

In general at least two fuel handling accident analyses are needed to support TSTF-51. More may be needed depending upon the safety systems assumed operable and the operating restrictions in the proposed/existing Technical Specifications.

One of these analyses should already exist. It assumes a decay time which corresponded to a technical specification (for some plants this has been moved to the Technical Requirements Manual). Typically, these analyses assume all designed engineered safety features (ESF) systems (water level in the spent fuel pool, containment cavity, refueling canal and heating and ventilation system, etc.) are operable or it assumes consistent with technical specification requirements that the movement of items that could cause a fuel handling accident (i.e. movement of irradiated fuel or other loads over irradiated fuel) are not allowed before this decay time.

The second analysis is typically a new analysis performed at the time which corresponds to the definition of "recently irradiated." The analysis is performed assuming, consistent with Technical Specification requirements, credit for only those ESF systems required to be operable, or restricts those actions which could cause a fuel handling accident (like movement of irradiated fuel assemblies or loads over irradiated fuel assemblies).

For TSTF-471 the removal of any operating restrictions (Core Alterations from the Applicability of an Limiting Condition of Operation (LCO)) needs to be supported by a fuel handling accident analysis (existing or proposed) which considers that items other than those listed under the Applicability of the LCO can now be moved without mitigating systems operable.

### **Comment 1**

On page 7 of the 02/01/2015 document provided to the staff, Proposed Actions 1 and 3 have the following bullet:

The licensee evaluated the dropping of loads allowed over irradiated fuel assemblies (i.e. a new fuel assembly, sources, or reactivity control components) onto irradiated fuel assemblies in the reactor vessel or fuel storage pool and confirmed that the resulting onsite and offsite dose results are bounded by the fuel handling accident of record, when crediting only those safety systems required to be operable by the proposed Technical Specifications.

The staff recommends the following:

The licensee evaluated the 1) dropping of loads allowed over irradiated fuel assemblies (i.e. a new fuel assembly, sources, or reactivity control components, tools etc.) onto irradiated fuel assemblies in the reactor vessel or fuel storage pool and 2) the dropping of an irradiated fuel assembly. These analyses confirm

ENCLOSURE

that the resulting onsite and offsite dose results are bounded by the fuel handling accident of record, when crediting only those safety systems required to be operable by the proposed Technical Specifications. These analyses (inputs, assumptions, methodology and results) should be provided to the staff.

For example, TSTF-51 changed the Applicability of several systems, like the Refueling Canal Water Level and Spent Fuel Pool Water Level with safety functions to be operable only "During the movement of irradiated fuel assemblies." If less than 23' of water is allowed whenever loads other than irradiated fuel assemblies are moved over the irradiated fuel, then an analysis needs to be provided for this scenario.

### **Comment 2**

On page 7 of the 02/01/2015 document provided to the staff, the second bullet of Proposed Action 1 states:

Prior to the decay time assumed in the accident analysis, new or irradiated fuel assemblies, sources, or reactivity components are not moved over the fuel seated in the reactor vessel.

The staff recommends the following:

Prior to the decay time assumed in the accident analysis restrict movement of irradiated fuel assemblies or loads (i.e. a new fuel assembly, sources, or reactivity control components, tools) over irradiated fuel assemblies (i.e. a decay time technical specification or a restricted Applicability in the LCO).

### **Comment 3**

For Technical Specifications modified by TSTF-51 and 471 the Applicability, Required Actions and Conditions of these Technical Specifications need to align with the safety analyses. A fuel handling accident can occur not only when an irradiated fuel assembly is dropped, but when other loads (i.e. a new fuel assembly, source, reactivity components, and tools) are dropped. The LCO's for ESFs credited in the fuel handling accident need to be Applicable when a fuel handling accident could occur. The Conditions and Required Actions of these LCO's should reflect the conditions where credited ESFs no longer function and take the Required Actions to either restore the ESFs credited in the accident analysis (i.e. BWOG LCO 3.7.10, Required Action C.1 states: "Place OPERABLE CREVS train in emergency mode.") or suspend actions that could cause a fuel handling accident (i.e. Core Alterations, movement of irradiated fuel and other loads). If dropped loads (other than irradiated fuel) are evaluated without the ESFs for these LCO's credited and the consequences of these analyses are bounded by the drop of the irradiated fuel assembly with the ESFs credited then the Applicability, Required Actions and Conditions need not reflect the drop of loads other than irradiated fuel unless the Applicability currently includes these loads.

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**ADAMS Accession Nos.: ML15041A737 (Summary); ML15041A060, ML15041A061, ML15041A062, ML15041A063 (Handouts); ML15104A572 (Attendees list); ML15040A069 (Package) NRC-001**

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