

November 20, 2015

MEMORANDUM TO: Kevin Hsueh, 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 SEPTEMBER 23, 2015, PRE-SUBMITTAL MEETING
REGARDING TSTF-553, "ADD ACTIONS FOR TWO INOPERABLE
CREATCS TRAINS" (TAC NO. MF6668)

On September 23, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff met with the Technical Specifications Task Force (TSTF) representatives for a pre-submittal meeting regarding proposed Traveler TSTF-553, "Add Actions for Two Inoperable CREATCS [Control Room Emergency Air Temperature Control System] Trains." A list of the meeting attendees is available in the Agencywide Documents Access and Management System (ADAMS) Accession No. ML15288A365. The meeting notice dated September 10, 2015, is available in ADAMS at Accession No. ML15243A331. Prior to the meeting the TSTF provided a draft version of the Traveler to the NRC staff (ADAMS Accession No. ML15293A266). The TSTF slides presented during the meeting are available in ADAMS at Accession No. ML15293A269.

TSTF-553 is applicable to Babcock and Wilcox (B&W) and Westinghouse Electric Company (Westinghouse) plants. The proposed Traveler provides an Action and 24-hour completion time when two trains of the CREATCS are inoperable. The standard technical specifications (STS) for other plant designs have an Action and completion time for two inoperable control room cooling trains, but the B&W and Westinghouse STS require entry into limiting condition for operation 3.0.3.

The NRC staff inquired how the TSTF will address the temperature increase in the 24-hour completion time. The TSTF members explained that the temperature limit is not at risk, but if the plant had an accident during that 24-hour window, the control room would heat up. During the accident, the operators could take actions to cool the control room at the direction of Technical Support Center.

The TSTF members explained that the Pressurized Water Reactor Owners' Group will be developing a methodology for calculating the temperature limit. Industry will issue a methodology for licensee's to use. But it will not be submitted for NRC staff review and approval (i.e., not a topical report). If the plant cannot maintain that limit, even with compensatory measures, then it would shut down.

The NRC staff asked about the difference between this proposed Traveler and the previously submitted Traveler, TSTF-538, which was not accepted. The TSTF members explained that TSTF-538 included proposed changes for three different systems, including the CREATCS and control room emergency ventilation system (CREVS). Traveler TSTF-553 is proposing changes to only the CREATCS, not the CREVS.

TSTF-553 would not be submitted as part of the Consolidated Line Item Improvement Process (i.e., CLIIP) because each applicant will provide a plant-specific justification for its individual control room area temperature limit.

The TSTF members discussed the need for the proposed changes and the basis for higher priority. While the loss of both trains of CREATCS is infrequent, when it does happen it has high consequences. The NRC staff is receptive to the suggested priority, but noted that if complexities arise during the review that would prevent completion within 1 year, the NRC management will be advised.

When the Traveler is submitted it will include a place-holder for a template of the engineering evaluation of the justification of the control room area temperature limit (in Attachment 2). A separate meeting will be held to discuss the template. The TSTF will provide a timeframe for the "template" meeting once it has the project authorization.

The NRC staff noted the provision in the TSTF-553 markup to accommodate plants which have adopted TSTF-505, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b." TSTF-553 will be the first Traveler submitted that needed this provision. The NRC staff and the TSTF members agreed that if providing this administrative provision would delay or unduly complicate the TSTF-553 review, that it would be removed.

In response to additional inquiries from the NRC staff, the TSTF members provided the following clarifications:

- The 4-hour verification frequency of the control room temperature was a precedent from other similar TSs.
- 3 out of 4 plants that have experienced two inoperable CREATCS trains, as shown on Slide 5 were Westinghouse-designed plants with ice condensers. The TSTF members stated that it was just a coincidence and not related to any specific common issues.
- The TSTF will explain in the Traveler how any shared equipment (i.e., fans) between CREATCS and CREVS could impact the habitability of the control room.

In conclusion, the NRC staff had suggestions for improvement but voiced no objections to the concept of the proposed change. TSTF-553 is currently undergoing industry review and is scheduled to be submitted by the end of October.

There were no questions received from the public.

Project No. 753

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ADAMS Accession Nos.: **Package** - ML15288A363; **Summary** - ML15288A457; **Draft Traveler** - ML15293A266, **TSTF Presentation** - ML15293A269; **Meeting Notice** - ML15243A331; **Meeting Attendees** - ML15288A365
DISTRIBUTION: See attached page *via e-mail NRC-001

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DATE	11/10/2015	10/27/15	10/28/2015	11/10/2015	11/18/15	11/20/2015

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Project No. 753

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DISTRIBUTION FOR SUMMARY OF SEPTEMBER 23, 2015, PRE-SUBMITTAL MEETING
REGARDING TSTF-553, "ADD ACTIONS FOR TWO INOPERABLE GREATCS TRAINS"
(TAC NO. MF6668)

Dated:

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