

March 3, 2016

MEMORANDUM TO: Kevin Hsueh, Chief
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Division of Policy & Rulemaking
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager
(RA by Lynnea Wilkins for)
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SUBJECT: SUMMARY OF FEBRUARY 18, 2016, PUBLIC QUARTERLY MEETING
WITH THE TECHNICAL SPECIFICATIONS TASK FORCE

On February 18, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives of the Technical Specifications (TS) Task Force (TSTF) in a public meeting at NRC headquarters in Rockville, Maryland. The enclosure provides a list of those in attendance and those that participated by teleconference. Information presented at the meeting by the TSTF representatives and NRC staff, as well as a list of those in attendance and those that participated by teleconference are available in the Agencywide Documents Access and Management System (ADAMS) under Package Accession No. ML16054A498.

The purpose of the meeting was for the NRC staff and the TSTF representatives to discuss a variety of TS issues and Travelers under review.

Traveler Review Process Improvements and Office Instruction Revision

The NRC staff gave an update on the status of the Traveler review process improvements and office instruction (OI) schedule. The OI revision is targeted for issuance by the end of June 2016. The NRC staff will consider options including sharing the key changes to the OI with the TSTF before issuance. The TSTF commented that while industry is supportive of the Traveler approval safety evaluation (SE), they would also like to have a model SE developed prior to the first plant adopting an approved Traveler. The NRC staff agreed to take this under consideration and discuss internally with management and the Office of General Counsel (OGC).

Requests for Additional Information (RAIs) Requesting In-Process Traveler to be updated to Reflect Travelers Approved after STS [Standard Technical Specification] Revision 4 Publication

The TSTF commented that response to these type of RAIs could get very confusing. The TSTF would prefer to simply discuss the overlap of the STS changes and what a licensee should do or how it impacts the current Traveler. The NRC staff responded that this is something the staff

needs in the interim until Revision 5 to the STS is issued. The NRC staff suggested one way to respond to the RAI would be to provide just one set of specifications to show "typical" TS changes for staff to understand how approved Travelers are impacting/interacting with the current Traveler.

NRC Endorsement of Nuclear Energy Institute (NEI) 15-03

The TSTF plans to discuss with NEI submission of a fee waiver request and is supportive of the NRC staff endorsing the NEI 15-03, "Licensee Actions to Address Nonconservative Technical Specifications" (ADAMS Accession No. ML15147A655), through a Regulatory Guide.

TSTF Suggestion to Add the Guidance in the Perry Safety Evaluation Regarding Redundant Support Systems to IMC-0326

NRC staff is still reviewing a plant-specific request and cannot discuss the issue generically at the meeting, but will most likely not include in IMC-0326. The TSTF informed the NRC that industry is working on operability guidance. All agreed that this item can be eliminated from future meeting agendas.

Advanced Passive 1000 (AP1000) Update

Kelli Roberts, AP1000 Owners' Group (APOG), gave an update on the new reactors. Industry is still evaluating when/how to integrate the APOG representative into the TSTF. In part, it depends on the AP1000 STS NUREG schedule. Bob Tjader, Office of New Reactors (NRO), stated that the NUREG is imminent, targeted for publishing in March 2016. The AP1000 STS will be NUREG-2194. Currently 4 plants of AP1000 design are being built.

NRC Response to TSTF July 23, 2015, Presentation on the Treatment of Fuel Handling Accidents in the Technical Specifications

NRC staff informed the TSTF that the staff of Radiation Protection and Consequences Branch (ARCB) are actively working on the study of these issues including a determination of whether or not these are safety issues. They plan to complete the study within next 3 months.

Response to NRC Comment on the TSTF's proposed Clarification of Requirements for TSTF-425, "Relocate Surveillance Frequencies to Licensee Control," Submittals

The NRC staff and TSTF discussed the comments provided in e-mail from TSTF dated February 11, 2016 (ADAMS Accession No. ML16054A709). The NRC staff is working with a steering committee on how to close out Facts and Observations (F&Os). Action is on NRC staff to give additional comments to draft letter (ADAMS Accession No. ML15041A061) by the end of April 2016.

NRC Letter Regarding Travelers that Contain Commitments

The NRC staff plans to issue the letter by July 29, 2016.

NRC Incorporation of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Case OMN-20 into Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a

Rulemaking target completion date is October 2016. Once the rulemaking is complete, licensees adopting TSTF-545, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing," will no longer need to include Code Case OMN-20 in their license amendment request (LAR). The TSTF needs to provide guidance for licensees adopting TSTF-545.

Status of Travelers Currently under NRC Staff Review (ADAMS Accession No. ML16054A533)

1. TSTF-454, Rev. 3, "Extend PCIV [Primary Containment Isolation Valve] Completion Times (NEDC-33046)"
 - a. Will withdraw – letter by end of March 2016.
2. TSTF-529, Rev. 3, "Clarify Use and Application Rules"
 - a. Draft model safety evaluation issued 1/29/16 (ADAMS Accession No. ML15345A447).
 - b. Comments due by 2/29/16 (20 business days).
3. TSTF-537, Rev. 0, "Increase CIV [Containment Isolation Valve] Completion Time; Update of TSTF-373"
 - a. Will withdraw – letter by end of March 2016.
4. TSTF-541, Rev. 0, "Add Exceptions to Surveillance Requirements When the Safety Function is Being Performed"
 - a. Second round of RAIs issued on 2/25/16 (ADAMS Accession No. ML16012A427).
 - b. TSTF - Since many questions are similar to first round – want to have a meeting to discuss and possibly elevate.
5. TSTF-542, Rev. 1, "Reactor Pressure Vessel Water Inventory Control"
 - a. Second-round RAI issued on 12/8/15 (ADAMS Accession No. ML15293A161).
 - b. Response due by 3/8/16 (90 calendar days).
 - c. Because of a different understanding in response date (calendar days vs. business days) – may be delayed with response.
6. TSTF-545, Rev. 3, "TS Inservice Testing [IST] Program Removal & Clarify [Surveillance Requirement] SR Usage Rule Application to Section 5.5 Testing"
 - a. NRC plans to issue the Notice of Availability within 2 months.
7. TSTF-547, Rev. 0, "Clarification of Rod Position Requirements"
 - a. Final SE in concurrence; target date is 3/18/16.
8. TSTF-551, Rev. 1, "Address Transient Secondary Containment Conditions"
 - a. RAI response submitted 1/26/16 (ADAMS Accession No. ML16026A026).
 - b. NRC staff is still discussing RAI responses internally, specifically the surveillance note. Will schedule a phone call, if needed.
 - c. Schedule for draft SE is 5/26/16.

9. TSTF-553, Rev. 0, "Add Action for Two Inoperable CREATCS [Control Room Emergency Air Temperature Control System] Trains"
 - a. NRC RAI issued on 2/23/16 (ADAMS Accession No. ML16028A453).

Discussion of Traveler under Development, TSTF-554, "Revise Reactor Coolant Leakage Requirements"

See TSTF Meeting Handout in ADAMS under Accession No. ML16054A531.

NRC comments/questions on presentation:

- Slide 4 Proposed REACTOR COOLANT LEAKAGE definition: NRC staff commented that the usual term is "controlled leakage."
- Slide 6, Item 3 under PWR Identified LEAKAGE heading: NRC staff commented that they would prefer the "primary to secondary LEAKAGE" term to be used and recommended the TSTF discuss it with the Steam Generator Task Force.
- Slide 6, Item 2 under the PWR IDENTIFIED LEAKAGE heading: NRC staff asked if the Bases will include a discussion about growth.
- Slide 11, first bullet should include structural integrity.
- Slide 11, second bullet should include adjacent components.
- Slide 11, last bullet should include adjacent systems.

Discussion of IMC 0326 Methodologies when Evaluating Operational Leakage

The NRC staff realizes that IMC 0326 methodologies for evaluating operating leakage in Class II and Class III piping are being interpreted differently across the agency. The NRC staff plans to engage with industry to reach agreement on if/how the IMC should be revised. Specifically, the wording in Sections C.12 and C.13. The NRC staff plans to have an update at next Quarterly meeting. NRR will inform the regional staff of the initiative.

Discussion of Separating the Calibration Frequency of Sensors and Channels under the Surveillance Frequency Control Program

See TSTF Meeting Handout in ADAMS at Accession No. ML16054A527.

Mr. Rich Stattel, NRC, reviewed the slides in advance of the meeting and provided feedback. Mr. Stattel commented that the concept is not without precedent and recommended the TSTF review the precedents. He also commented that the reason for the current surveillance intervals was based on accessibility (i.e., during outages), therefore, the TSTF may want to extend the surveillance frequencies further. However, for accessible instruments where changes in technology have led to changes in frequencies the request may be hard to justify.

Slide 6 lists benefits of the proposed change, but there are risks too. Mr. Stattel recommended the TSTF include a list of the risks and what actions would be taken to mitigate those risks. The TSTF responded that any licensee adopting these proposed changes would need to meet the TSTF-425 requirements. The TSTF plans to include a discussion of the TSTF-425 requirements in the Traveler.

Mr. Robert Elliott, NRC, commented that in summary the NRC is supportive of the proposed changes and has no preference between the two options presented. A pre-submittal meeting will be scheduled once the TSTF has developed the Traveler further.

Potential Traveler Regarding Spent Fuel Pool Neutron Absorber Monitoring Program

See TSTF Meeting Handout in ADAMS at Accession No. ML16056A251 and NRC staff handout in ADAMS at Accession No. ML16054A503.

The T-traveler will be issued to industry as guidance and will not be submitted to the NRC for approval as a proposed change to the STS. Once NEI topical report (TR) is approved the T-traveler will be superseded by a regular Traveler. This is why there is minimal detail in the T-traveler.

Mr. Matt Yoder, NRC, recommended a specific reference to testing for boron-10 areal density. The reference to 10 years is acceptable for some materials, but other materials (such as Boraflex and Carborundum) have exhibited faster degradation and therefore should have shorter intervals between surveillances.

Mr. Scott Krepel, NRC, handed out several plant-specific examples to help TSTF understand the specificity the NRC staff would like to review. None of the example TS are for Boraflex or Carborundum, but they do show the level of detail the NRC staff is expecting.

Future traveler submittals:

1. TSTF-546, "Revise APRM [Average Power Range Monitor] Channel Adjustment Surveillance Requirement"
 - The TSTF plans to survey industry to see if interest. They should know if they will submit the Traveler by early spring 2016.
2. TSTF-552, "Diesel Generator Frequency and Voltage Tolerances (WCAP-17308)"
 - The draft SE of the topical report WCAP-17308 has been issued. The Traveler submission is on hold until comments on the draft SE are resolved.
3. TSTF-554, "Revise Reactor Coolant Leakage Requirements"
 - See TSTF Meeting Handout in ADAMS at Accession No. ML16054A531.
4. Proposed Traveler to Remove BWR Mode 2 Requirement from limiting condition for operation (LCO) 3.0.3
 - The TSTF plans to follow up with the Boiling Water Reactor Owners' Group on this.

K. Hsueh

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Next quarterly public meeting:

Scheduled for Thursday, April 28, 2016.

There were no public comments.

Project No. 753

cc: See next page

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There were no public comments.

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ADAMS Accession Nos.: ML16054A498 (Package)
ML16060A044 (Summary); ML16035A525 (Notice)
ML16054A503, ML16054A527, ML16054A531, ML16054A533, ML16054A251, ML16054A709 (Handouts/e-mail);
ML16054A505 (Attendees list) ***via e-mail** **NRC-001**

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DATE	2/29/16	3/2/16	3/3/16	3/2/16	3/3/16

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Project No. 753

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