



# U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation

## ***NRR OFFICE INSTRUCTION***

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### Change Notice

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Office Instruction No.: LIC-600, Revision 1

Office Instruction Title: Standard Technical Specifications Change Traveler Review and Adoption Process

Effective Date: July 23, 2018

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Responsible Organization: NRR/DSS/STSB

**Summary of Changes:** Revised title to better reflect purpose of Office Instruction (OI). Complete re-write of the OI to reflect changes in process from 2007 and more recent changes in 2015 along with organizational changes. Changes to the process include how to disposition problems with an approved traveler.

Training: Self-study by Technical Specifications Branch staff. Training session for Division of Operating Reactor Licensing project managers and technical staff. E-mail to all Office of Nuclear Reactor Regulation staff.

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**NRR OFFICE INSTRUCTION  
LIC-600, Revision 1**

**Standard Technical Specifications Change Traveler Review and Adoption Process**

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**1. POLICY**

It is the policy of the Office of Nuclear Reactor Regulation (NRR) to establish procedures and guidance for its staff to meet the requirements and performance goals established in legislation, regulations, the Agency's strategic plan, and office-level operating plans. Reviewing changes to enhance the Standard Technical Specifications (STS) proposed by the industry's Technical Specifications Task Force (TSTF) supports the Nuclear Regulatory Commission's (NRC's) effectiveness and efficiency goals.

**2. OBJECTIVES**

Proposed changes to the STS submitted by the TSTF or prepared by the NRC staff are called travelers. The objective of this office instruction is to define the process by which the NRC staff reviews travelers for incorporation into the STS. Once a traveler is approved by the NRC staff, licensees may submit a license amendment request (LAR) to incorporate the STS changes into the plant-specific technical specifications (TS). This is referred to as "adopting" the traveler. This office instruction also describes the process for handling technical issues that may arise when a licensee adopts the traveler.

**3. BACKGROUND**

The purpose of the traveler program is to minimize industry and NRC time and effort by providing a streamlined review and approval of STS changes. The traveler review process to change the STS improves the efficiency of the licensing process by allowing the NRC staff to review and approve a proposed STS change that will be used and referenced in the preparation of LARs by multiple licensees following approval of the traveler. The process streamlines the LAR reviews involving NRC-approved STS changes and reduces unnecessary regulatory burden.

As stated in NRC Administrative Letter 96-04 dated October 9, 1996, "Efficient Adoption of Improved Standard Technical Specifications," total adoption of the STS substantially improves the efficiency of the regulatory process. As stated in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 *Federal Register* 39132), it is the policy of the NRC that the STS be maintained for each of the nuclear steam supply systems owners' groups. In 1992, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical specifications," the NRC issued a version of the STS to clarify the content and form of requirements necessary to ensure safe operation of nuclear power plants.

Travelers are a means by which the NRC maintains the STS NUREGs. Once approved, the traveler is added into a future revision of the STS NUREGs. The actual publication and update of the STS by incorporation of approved travelers is done on an as-needed basis.

The NRC staff conducts technical and regulatory review of proposed changes to the STS as well as of plant-specific LARs to adopt NRC-approved changes to the STS. The traveler submittal also provides the model application for an LAR. This improves the efficiency of the NRC licensing processes by reviewing and documenting STS change requests in a manner that supports a more streamlined review of subsequent LARs. Following the NRC staff's approval of the traveler, licensees may submit an LAR to adopt the traveler by citing the relevant information made available during the traveler approval process and following the model application.

**NOTE: Unless otherwise noted, all timeframes are defined as calendar days.**

#### **4. BASIC REQUIREMENTS**

##### **4.1 Traveler Review Process**

The Technical Specifications Branch (STSB), within the Division of Safety Systems (DSS) of NRR, has the responsibility for managing the traveler program. An STSB project manager (PM) is assigned as the TSTF PM and manages the traveler program. Additionally, a technical reviewer in STSB is designated as the lead reviewer for each proposed traveler.

Travelers are typically submitted by the TSTF but may also be proposed or developed by the NRC. Review or approval by the owners' groups and the TSTF is not required for the NRC to change the STS. NRR staff and the TSTF should be in regular contact to discuss NRC's ongoing reviews and other regulatory matters requiring NRC review and approval. Frequent and early communications between the NRC staff and the TSTF can help avoid unnecessary delays in the processing of travelers.

Appendix B describes the procedure for processing travelers. Appendix C provides a diagram of the procedure. The following are the primary activities covered in the procedure:

- Notice of intent to submit
- Pre-submittal meeting
- Fee exemption request
- Traveler submittal
- Work plan preparation
- Acceptance review
- Requests for additional information (RAIs)
- Draft safety evaluation (SE)
- Preparation and issuance of the Congressional Review Act (CRA) clearance
- Final SE

## **4.2 Traveler Adoption Process**

The staff should follow the guidance for reviewing LARs provided in LIC-101, "License Amendment Review Procedures." When the staff is reviewing the LAR to adopt a traveler, they should use the model SE, if one exists. The staff should also review recently approved traveler adoptions to advise STSB if changes to the model SE should be made. If a model SE does not exist, the staff should use precedent SEs, if applicable. If a generic issue is discovered during the course of the plant-specific adoption of an approved traveler, the staff should follow the process outlined in Section 4.3.

### **4.2.1 Consolidated Line Item Improvement Process**

Selected travelers are approved for use in the Consolidated Line Item Improvement Process (CLIIP). These travelers generally meet the following criteria: not overly complex; few if any plant-specific variations expected; little plant-specific data/analysis required; and no technical branch input needed for the LAR review. Only the STSB reviewer and the Division of Operating Reactor Licensing (DORL) plant PM are required to review the LAR.

## **4.3 Issues with Approved Travelers**

Occasionally, an issue arises that may impact the NRC staff's basis for approval of a traveler. This is often, but not always, identified during the review of a plant-specific LAR to adopt the traveler. If identified during the review of a plant-specific LAR and the issue is plant-specific in nature, RAIs will be issued to the licensee. If the issue may be generic to the traveler, the following process should be used.

### **4.3.1 Initial Internal Notifications**

The technical reviewer identifying the issue will prepare a summary of the issue with recommendation for resolution/path forward. If the issue is approved by the technical branch branch chief (BC), the technical branch BC will notify STSB and DORL BCs.

During the evaluation, licensee engagement, including communications on the potential RAI regarding the generic issue, is not needed since the staff is re-evaluating a prior NRC position. Because it is pre-decisional, the issue needs to be vetted through management before any discussions with the TSTF or licensee.

### **4.3.2 Assess the Impact of the Concern**

The issue will be reviewed using existing office/agency backfit guidance and addressed accordingly.

### Issue is Not Generic

The technical branches will document the issue, discussing the reasons it's no longer of generic concern. If necessary, the DORL PM will issue plant-specific RAs, developed by the technical branches.

### Issue is Generic

The technical branch, STSB, and DORL BCs should immediately inform his or her respective division management of the issue and proceed to the next section. DORL division management will assign a DORL BC who will be the DORL point of contact for implementing a consistent NRC process for resolution of the generic issue by the licensees.

#### **4.3.3 Internal Alignment at Branch and Division Management Levels if the Issue is Generic**

##### BC Alignment

The BCs must agree that the issue is generic and has a safety impact worth pursuing a generic resolution. The review schedule will also be discussed during alignment.

- Deliberate on staff recommendation.
- Gain alignment from all involved BCs.
- Following the BC alignment, each BC will brief his or her division management including why the issue is considered generic, the safety impact, the review schedule, and recommended path forward (e.g., should traveler be suspended, how to handle LARs currently under review, etc.).

##### Division Management Alignment

The division managers must agree that the issue is generic and has a safety impact worth pursuing a generic resolution. The review schedule will be discussed and timeliness goals will be set during alignment.

- Deliberate and decide on recommendations from staff and BC.
- If the division management decides that the issue will not be pursued, then the TSTF PM will prepare a memorandum to file documenting the decision with input from the technical branch reviewers.

- If the division management decides that the issue will be pursued, then the following decisions need to be made before proceeding to Section 4.3.4.
  - Division management will decide whether or not the approval of the traveler will be suspended during the issue resolution. Suspension is a temporary “hold” on the approved traveler while the staff is investigating the issue. While suspended, the NRC will not accept any new applications to adopt the traveler. The TSTF PM will notify the DORL Technical Assistant (TA) that any applicable TSTF applications should not be accepted until further notice. The DORL TA will ensure that DORL PMs are properly notified.
  - Division management must also decide how to handle any LARs currently under review, considering pros and cons of each choice as they apply to a particular situation. Options include: the LAR review is put on hold, the LAR is denied (or request to withdraw), or the LAR review continues with the licensee addressing the identified generic issues on a plant-specific basis.
    - The LAR review schedule may need to be modified per division management direction (e.g., extend review, issue exclusion memo, etc.).

#### **4.3.4 Notification of the TSTF and Licensee(s)**

The TSTF PM will inform the TSTF by phone and/or e-mail. This will be followed by a publicly available letter to the TSTF. The letter to the TSTF will indicate whether or not the approval of the traveler has been suspended (including whether or not any new applications to adopt the traveler will be accepted) and how the NRC will handle LARs currently under review with all internal stakeholders on concurrence. The suspension letter is signed by the DSS Director. The TSTF PM will notify all DORL PM(s) with an LAR currently under review that review has been suspended and provide the schedule for resuming the review. The DORL PM(s) is (are) responsible for notifying licensees with LARs currently under review.

#### **Public Meeting**

The TSTF PM will schedule a public meeting with the TSTF and appropriate NRC staff and management to discuss the issue and resolution options.

#### **Possible Resolutions**

The list of possible resolutions below is not all inclusive, other alternatives may include standard RAIs issued to all licensees, revision to the model application, or a revision to the model SE, etc.

### Withdrawal of NRC Approval

- If previously suspended, the suspension becomes permanent and the NRC withdraws approval of the traveler.
- Licensees can no longer submit LARs to adopt the traveler. Any LARs currently under review would be terminated (denied or withdrawn) or treated as plant-specific reviews in accordance with LIC-101. Treatment of LARs as plant-specific reviews should only be done with the consent of the licensee and in cases where the NRC concludes a reasonable plant-specific success path exists.
- A backfit analysis will be performed to determine if licensees that have already implemented the traveler can continue to have the change in their TSs.
- Modify the STS accordingly in the next revision.

### Revision of Traveler

- The TSTF may submit a proposed revision to the STS for NRC staff review and approval. This may be a new traveler with a new number, which supersedes the one in question.
- The NRC staff may revise an existing traveler package as needed.
- No new LARs will be accepted while the new or revised traveler is under review.
- Licensees with LARs currently under review will be terminated (denied or withdrawn) or treated as plant-specific reviews.
- A backfit analysis will be performed to determine if licensees that have already implemented the traveler can continue to have the change in their TSs.
- NRC will issue a revised traveler, traveler SE, and model SE, as applicable.

### No Changes

- Continued use of traveler as previously approved is permitted.
- Letter closing the issue and detailing why the continued use is acceptable will be issued to the TSTF.

### Resolved via Other “Generic Communication”

- Some issues may extend beyond the TS. Other forms of generic communication will be considered in these cases.

- If the traveler was previously suspended, division management will decide if the suspension will be lifted or not while the issues are being resolved via generic communications.
- Regardless of whether or not the traveler was previously suspended, division management will decide how to handle any LARs currently under review while the issues are being resolved via generic communication.
- A letter to the TSTF will be issued detailing the path forward including which if any generic communication process will be used.

## **5.0 RESPONSIBILITIES AND AUTHORITIES**

### **5.1 Technical Reviewers**

The technical branch reviewers will review and evaluate travelers using existing guidance for license amendments to the extent practical. In addition, the reviewers will:

- aid the TSTF PM in determining if a traveler is a CLIP candidate as described in Section 4.2.1,
- provide resolution to the comments on the draft SE if requested by the TSTF PM,
- notify STSB of any problems with approved travelers, and
- attend quarterly public meetings with the TSTF, as needed.

### **5.2 STSB Reviewer**

The STSB reviewer will review and evaluate travelers using existing guidance for license amendments to the extent practical. In addition, the reviewer will:

- serve as the lead reviewer,
- aid the TSTF PM in determining if a traveler is a CLIP candidate as described in Section 4.2.1,
- review the submittal to verify it meets the traveler criteria as described in Appendix B, Section 6.1,
- integrate all the technical branch SE inputs with the STSB input into one SE,
- assist with preparing cost estimate for CRA as needed, and
- attend quarterly public meetings with the TSTF.

### **5.3 TSTF PM**

The TSTF PM will follow existing guidance for license amendments and topical reports to the extent practical. In addition, the TSTF PM will:

- serve as the principal point of contact between the NRC staff and the TSTF,
- communicate with Office of the Chief Financial Officer (OCFO) about the status of the fee exemption request,
- review the submittal to verify it meets the traveler criteria and CLIP criteria as described in Appendix B, Section 6.1, and Section 4.2.1, respectively,
- indicate in the draft and final SE letters to the TSTF whether or not the traveler is approved under the CLIP,
- prepare draft model SE with assistance from the STSB lead,
- issue draft SEs, including obtaining a no legal objection (NLO) from the Office of the General Counsel (OGC),
- resolve comments from the TSTF on the traveler and model SEs,
- if needed, process traveler SE through CRA clearance,
- prepare final model SE with assistance from the STSB lead,
- issue final SEs, and
- coordinate and attend quarterly public meetings with the TSTF.

### **5.4 Technical Branch BCs**

The technical branch BC will use existing guidance for license amendments to the extent practical. In addition, the BC will:

- notify STSB of any issues with approved travelers and follow process to address them, and
- attend quarterly public meetings with the TSTF, as needed.

### **5.5 STSB BC**

In addition to the duties in Section 5.4, the STSB BC will:

- oversee the daily operation of the traveler process and interactions with the TSTF,
- coordinate and attend quarterly public meetings with the TSTF, and

- conduct periodic calls and meetings with the TSTF, as needed.

#### **5.6 DSS Division Director**

The DSS division director has overall responsibility for the traveler process. The DSS division director will:

- coordinate with technical divisions on issues related to approved travelers, and
- approve suspension or denial letters.

#### **5.7 Office of the General Counsel**

The OGC directs matters of law and legal policy, providing opinions, advice, and assistance to the agency. Specifically, the office provides no legal objection, if applicable, on the draft and final SEs. OGC also determines if the proposed traveler and its approval would fall under the CRA.

#### **5.8 DORL PMs, TS Subject Matter Expert, and Management**

The DORL TS subject matter expert (SME) is the liaison between the STSB and DORL and coordinates the assignment of the DORL PM for a given traveler.

A DORL PM will be assigned to review the traveler, model SE, and model application to determine if there are issues relative to processing the LARs seeking to adopt the approved traveler (e.g., inadequate technical justification in the SE, inadequate no significant hazards determination, etc.).

The DORL TS SME will be on distribution for traveler documents and will attend TSTF meetings for awareness, when needed.

A DORL BC assigned by division management will concur on draft and final SEs approving travelers.

After a traveler is approved and a licensee submits an LAR to adopt it, DORL PMs will:

- follow the model SE as closely as possible when preparing plant-specific SEs to adopt approved travelers,
- coordinate with the STSB to process LARs adopting CLIP travelers, and
- notify STSB of any issues with approved travelers and follow process for handling issues with approved travelers.

DORL management will participate in management meetings with technical divisions and DSS to discuss traveler-related issues, and participate in TSTF meetings as needed. They will assign a lead PM when traveler-related issues arise.

**6. PERFORMANCE MEASURES**

There are no performance measures for traveler reviews.

**7. PRIMARY CONTACTS**

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**8. RESPONSIBLE ORGANIZATION**

NRR/DSS/STSB

**9. EFFECTIVE DATE**

July 23, 2018

**10. REFERENCES**

None.

**Enclosures:**

1. Appendix A – Change History
2. Appendix B – Guide for Processing Travelers
3. Appendix C – Diagram of Traveler Review Process
4. Appendix D – Frequently Asked Questions Regarding Travelers

**Appendix A, Change History****Office Instruction LIC-600**

<b>LIC-600 Change History - Page 1 of 1</b>			
<b>Date</b>	<b>Description of Changes</b>	<b>Method Used to Announce &amp; Distribute</b>	<b>Training</b>
08/08/2002	Initial Issuance	E-mail to all staff	Self-study by owners group PMs and technical BCs.
07/20/2018	Revised title to better reflect purpose of Office Instruction (OI). Complete re-write of OI to reflect changes in process from 2007 and more recent changes in 2015 along with organizational changes. Changes to the process include how to disposition problems with an approved traveler.		Self-study by Technical Specifications Branch staff. Training session for Division of Operating Reactor Licensing project managers and technical staff. E-mail to all Office of Nuclear Reactor Regulation staff.

**Appendix B**  
**Guide for Processing Travelers**  
**Office Instruction LIC-600, Revision 1**

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## **1.0 INTRODUCTION**

The traveler review process should adhere to the guidelines established within this appendix. To the degree practical, the traveler process should follow existing guidance for the review of license amendments provided in LIC-101, "License Amendment Review Procedures," and topical reports provided in LIC-500, "Topical Report Process." Variances in duration of review should be evaluated and managed by the Technical Specifications Task Force (TSTF) project manager (PM) in the Technical Specifications Branch (STSB) with input from the STSB lead reviewer and other technical branches. Appendix C provides a diagram of the process depicting the actions and responsibilities of the TSTF, the TSTF PM, and the technical reviewers. These actions and responsibilities are described below.

## **2.0 TRAVELER PRE-SUBMISSION PROCESS**

### **2.1 TSTF Notification of Intent to Submit**

The TSTF notifies the TSTF PM of the intent to submit a traveler. This notification can be as simple as an e-mail or as formal as a letter to the U.S. Nuclear Regulatory Commission (NRC). When notifying the TSTF PM about the intent to submit, the TSTF should provide basic details about the submittal including: the subject area, which NUREGs would be revised, which sections of the Standard Technical Specifications (STS) would be changed, the intended date of submittal, and if a fee exemption will be requested.

### **2.2 Create a Pre-submittal Project/Enterprise Project Identifier in Reactor Program System – Licensing/Workload Management**

If a pre-submittal meeting is planned, the TSTF PM will create a project/Enterprise Project Identifier (EPID) using the Reactor Program System – Licensing/Workload Management (RPS - Licensing/WM) software. The pre-submittal EPID will be provided to all parties involved with the pre-submittal meeting.

### **2.3 Pre-submittal Meeting**

The purpose of a pre-submittal meeting is for the TSTF to meet with the NRC staff to discuss the traveler before it is formally submitted for review. A pre-submittal meeting is not required to begin the traveler review process; however, the TSTF is encouraged to discuss plans for future submissions. The TSTF should contact the TSTF PM well in advance of the submittal and request a pre-submittal meeting. The TSTF PM will ensure that the appropriate technical staff are available. The TSTF PM will issue a detailed meeting summary with feedback from the TSTF and close the pre-submittal project/EPID using the RPS - Licensing/WM software.

## **3.0 FEE EXEMPTION REQUEST**

Traveler reviews are subject to fees based on the full cost of the review. The TSTF must submit fee exemption requests, in writing, directly to the Office of the Chief Financial Officer (OCFO) as described in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 170.11, "Exemptions." If a fee exemption was granted, and the traveler is later

withdrawn, the TSTF may decide to re-submit at a later date. In that case, the TSTF is required to request another fee exemption.

#### **4.0 TRAVELER SUBMISSION**

##### Cover Letter

The TSTF PM should review the cover letter for the following information:

- Name of the NRC TSTF PM and STSB branch chief (BC). The TSTF PM will ensure that the NRC technical branches are provided with a copy of the traveler.
- Project number for the TSTF, which is 753.
- A statement of the applicability of the traveler and its future intended use and adoption.
- A statement indicating whether the traveler is based on an approved topical report.
- A proprietary withholding request, if applicable.
- The fee exemption request listed as a reference, if applicable.

##### Traveler

The traveler should meet the following criteria:

- The proposed change to the STS must, at a minimum, meet the requirements of 10 CFR 50.36, "Technical specifications." The NRC staff will also review proposed STS Bases-only changes, even though a site-specific bases-only change would not always be required to be submitted to the NRC for approval.
- The traveler is expected to be adopted by multiple licensees.
- The submittal must include mark-up pages for affected technical specifications (TS) and bases.
- The traveler submittal should contain sufficient technical information, both in scope and depth, for the NRC staff to begin its detailed technical review.
- The traveler submittal should identify the regulatory criteria used to determine that it is acceptable. When the traveler proposes an alternative to an approved approach described in a guidance document, the NRC staff should verify the completeness of the scope and logic of the alternate methodology.

#### **4.1 Work Plan Preparation**

The TSTF PM will create a project/EPID using the RPS - Licensing/WM software, identify the technical branches to be involved in the review, and propose a review schedule. The TSTF PM will send an e-mail to all NRR BCs to ensure that no technical branches are omitted from the review.

## 4.2 NOTES and REVIEWER'S NOTES

NOTE is not an acronym and is formatted as all capitals in TS and SEs. NOTES are used in the STS to provide exception to or to explain requirements. These NOTES are part of the TS and must be included in the plant-specific TS. Licensees must include the STS NOTES in its plant's TS in order to adopt the traveler. If a licensee does not include the NOTES in its plant's TS, it is considered a variation from the traveler and the licensee must provide justification as to why the NOTES should not be included in its TS.

STS NOTES are in the format:

----- NOTE -----  
 Not required to be performed until 24 hours  
 after exceeding 25% RTP.  
 -----

REVIEWER'S NOTES appear predominantly in the STS Bases and occasionally in the STS (especially the Administrative Controls Section). They are similar to NOTES in the model application or model SE in that they are used to provide instructions to the licensee or NRC staff regarding how to adopt the STS. The REVIEWER'S NOTES are not to be included in plant-specific TS or Bases.

STS REVIEWER'S NOTES are in the format:

-----REVIEWER'S NOTE-----  
 This SR is applied only to Functions of Table 3.3.6.1-1 with required  
 response times not corresponding to DG start time.  
 -----

## 5.0 ACCEPTANCE REVIEW

Technical branches will perform their acceptance review within 30 days of the traveler entry into Agencywide Documents Access and Management System (ADAMS), using the acceptance criteria listed in Section 4.0, and notify the STSB TSTF PM. If a fee waiver has been requested, the 30-day acceptance review period does not commence until the fee exemption request has completed.

The staff determines if the information provided in the traveler meets the administrative and technical sufficiency requirements listed in Section 4.0 of this Appendix.

If the TSTF recommends a traveler to be part of the Consolidated Line Item Improvement Process (CLIIP), the staff will consider whether the traveler meets that criteria, during the acceptance review. For more details on the CLIIP, see FAQ #2 in Appendix D.

Any non-acceptances will be documented via a formal memorandum from the technical branch BC to the STSB BC. Traveler reviews do not have an option of "non-accept with opportunity to supplement." A traveler is either accepted for review or not accepted for review.

## **5.1 Exceptions to the Traveler Acceptance Criteria**

The traveler should meet the acceptance criteria listed in Section 4.0 of this Appendix. Exceptions to these criteria may be allowed on a case-by-case basis if the NRC staff determines that an exception is in the public or agency interest. Example justifications for an exception could be the traveler's contribution to resolving a safety-related issue and advancement in technology that would benefit safety or reduce an operational burden.

## **5.2 PM Issues Acceptance Letter**

Within 60 days of traveler entry into ADAMS, the TSTF PM will issue an acceptance letter to the TSTF with the STSB and technical branch BCs on concurrence. The acceptance letter will document the review schedule and estimate of staff hours. The acceptance letter is signed by the TSTF PM. Any modifications to the baseline schedule will be conveyed to the TSTF in periodic traveler status calls.

If the NRC staff decides to not accept the traveler for review, the TSTF PM will notify the TSTF in advance of issuing the non-acceptance letter. The non-acceptance letter is signed by the Director, Division of Safety Systems (DSS).

## **6.0 REQUESTS FOR ADDITIONAL INFORMATION**

The technical branches will conduct the technical review of the traveler including review of the model application. The technical branches provide requests for additional information (RAIs) to STSB in accordance with the milestone dates. The RAIs should be approved by the technical branch BC by the milestone date.

### **6.1 Model Application**

The traveler includes a proposed model application (i.e., model license amendment request (LAR)), which licensees will use as a template to prepare and submit an LAR to adopt the traveler. The STSB lead and technical branches should review the proposed model application for completeness. Specifically, the technical branches should ensure that the model application includes appropriate data and information required for future submittals, licensee regulatory commitments, and plant-specific items that a licensee adopting the traveler will need to submit. It should also incorporate any conditions and limitations the staff has placed on the use of the approved traveler.

If the model application is lacking items mentioned above or other key information that a licensee would need to submit in an LAR, the NRC staff should identify this via RAIs. The TSTF will then revise the model application as part of the RAI response.

### **6.2 Issuance of RAIs**

Following a clarity call, if needed, RAIs will be officially issued to the TSTF by the TSTF PM. The cover letter transmitting the RAIs will list the agreed-upon date for the TSTF to provide its RAI responses. The default response time is 90 days. The letter will also reiterate the review schedule milestones from the acceptance letter, or provide a revised schedule if the milestone dates have changed. The date of the RAI transmittal e-mail

from the technical branch BC will be used as the concurrence date on the RAI letter to the TSTF, unless substantive changes are made. The TSTF PM signs the RAI letter.

### 6.3 RAI Responses

The TSTF will review the RAIs and respond to the NRC by the agreed upon date. To reduce the likelihood of a second round of RAIs, it is recommended that a clarity call be held in advance to discuss the proposed RAI responses before they are submitted.

The STSB and the technical branches will review the RAI responses and communicate to the TSTF PM if any of the RAI responses are unacceptable or if any RAIs remain open. Unacceptable responses may necessitate a second round of RAIs or closure of the review. Prior to sending a second (and any subsequent) round of RAIs in a specific technical area, the TSTF PM, the technical reviewers, and the respective BCs should meet to discuss the need for a second round of RAIs and whether alternative methods, such as a public meeting for gathering the necessary information, may be more effective and efficient.

If changes to the traveler are needed due to RAIs, the TSTF will provide a revised traveler with the RAI responses. Additionally, if changes are needed to the model application due to RAIs, the TSTF will provide a revised model application. This is the normal process and does **not** mean that the staff will restart the review (i.e., creating a new project/EPID using the RPS - Licensing/WM software and performing another acceptance review).

The NRC staff has several options in the event that RAI responses are late, incomplete, or inadequate. These include, but are not limited to:

- Extend the review schedule or issue a second round of RAIs, if needed.
- Close the review. If the TSTF cannot provide a complete RAI response by an agreed-upon milestone, the STSB BC, with the agreement of the appropriate technical branch BCs, can close its review of the traveler via a letter from the STSB BC. The STSB, technical branch, and the Division of Operating Reactor Licensing (DORL) BCs will brief their respective division management prior to communicating the closing of the review with the TSTF. The TSTF PM will also schedule a meeting with all of the involved division management to ensure alignment before proceeding.
- Request that the TSTF withdraw its request for NRC review and approval. The withdrawal should be submitted in writing. The STSB BC will issue a letter to acknowledge receipt of the withdrawal letter and to verify that the NRC's review has been closed. The STSB BC will brief his/her division management prior to issuing the letter.
- Prepare the safety evaluation (SE) and approve only certain portions of the traveler.

### 7.0 DRAFT SE

The technical branch SE input will become the traveler SE (documenting approval of the change to the STS) and the model SE (to be used by NRC staff as a template when a

licensee submits an LAR to adopt the traveler). The SE should follow the format provided in LIC-101. The technical branches only need to provide one SE input. The STSB lead reviewer and TSTF PM will finalize the SE and develop the traveler SE and model SE from the input provided.

## 7.1 Preparation of the SE Input

The technical branches will provide BC-approved input to the STSB lead reviewer in accordance with the milestone dates. The STSB lead reviewer will then combine all SE inputs from other technical branches with the STSB input. The STSB lead will work with the technical branches, if needed, to integrate all of the inputs into one SE.

In some cases, the technical branches may need to identify specific follow-up steps or actions that need to be verified by the technical branches once a licensee decides to adopt the approved traveler in an LAR. Any follow-up actions that a technical branch needs to verify will be either included as NOTES in the SE or listed in a separate section of the SE titled "Use and Adoption of the Traveler." NOTES and/or this section of the SE will not be included in the plant-specific SE. NOTE is not an acronym and is formatted as all capitals in TS and SEs.

NOTEs are used throughout model applications and model SEs to provide additional information to the reviewers (licensee and NRC staff). This information is typically provided to aid the reviewers in preparing the LAR or SE and provide more detail or explanation of what is expected to be included in the LAR or what NRC staff should be reviewing and why. These NOTES are not to be included in the plant-specific LAR or the SE approving the LAR. The NOTES are typically shown in brackets and italicized.

### Draft Traveler and Model SEs

The traveler SE documents the basis for the NRC staff's approval of the change to the STS NUREGs. The staff's evaluation should include the basis for the changes to the STS Bases. This portion of the traveler SE is not included in the model SE or in plant-specific SEs.

The model SE is developed from the traveler SE by STSB lead reviewer and/or the TSTF PM. The model SE will clearly identify plant-specific items that a licensee adopting the traveler will need to submit.

Model SEs are developed for most travelers. For larger more complicated travelers (e.g., TSTF-542) or travelers where significant variations are expected, STSB has the discretion to not prepare a model SE. A traveler SE, documenting the basis for approving changes to the STS NUREG will be issued. A model SE may be developed after sufficient experience with an approved traveler has been gained.

## 7.2 Issuance of Draft SEs

The TSTF PM is responsible for preparing, assembling, and transmitting the draft SEs to the TSTF. The TSTF PM routes the draft SE package through DORL for concurrence and through the Office of the General Counsel (OGC) for a no legal objection determination and for determination if the review falls under the Congressional Review Act (CRA). The draft SEs are signed by the STSB BC.

The draft SEs are issued to the TSTF to provide it with the opportunity to clarify any factual inaccuracies and, if necessary, revise the traveler (including the model application) to reflect the staff's findings. Typically a 60-day comment period is provided. To ensure that sufficient time is provided for review, the TSTF PM will e-mail the TSTF a copy of the draft SEs once the cover letter is signed. The TSTF PM should not wait for the draft SEs to be publicly available in ADAMS.

## **8.0 CONGRESSIONAL REVIEW ACT RULE EVALUATION**

The NRC staff's approval of travelers is potentially considered a "rule" under the Congressional Review Act (CRA) (see OGC memorandum, "Agency Documents Requiring Congressional Review," dated December 13, 2010 (ADAMS Accession No. ML103470301)). This determination is made by OGC, currently the Legal Counsel, Legislation and Special Projects division.

If OGC determines that the SE is not a rule under the CRA, then the TSTF PM does not complete any additional CRA steps. If OGC determines that the SE is considered a rule under the CRA, then the TSTF PM will prepare a CRA input summary to be submitted to the Office of Management and Budget (OMB) to allow the OMB to determine whether the SE is also a "major rule" under the CRA. See Appendix R, "Congressional Review Act," in the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-300, "Rulemaking Procedures," for detailed guidance, and coordinate with the Office of Nuclear Material Safety and Safeguards, Division of Rulemaking. Once the OMB has completed its review, the TSTF PM will complete U.S. Government Accountability Office (GAO) form GAO-001, "Submission of Federal Rules under the Congressional Review Act." The TSTF PM will submit 3 copies of the form along with 3 copies of the final SEs to the Office of Congressional Affairs (OCA). The OCA will submit the CRA forms and guidance document to Congress and GAO as required for compliance. The following list provides instructions for completing certain boxes on the GAO-001 form:

- In box 4 on the form, instead of a regulation identifier number (RIN), list the applicable NUREG numbers. Don't leave this box blank.
- In box 5 on the form, check "Non-major Rule" or "Major Rule," as appropriate based on the OMB's determination. Don't leave this box blank.
- In box 6 on the form, check "Other," and then indicate what kind of document it is in the space provided, e.g., "Policy Statement." Don't leave this box blank.
- Where the form asks for "Submitted by," leave the signature line blank. Insert "[OCA director's name], Director, Office of Congressional Affairs," below the signature line. The OCA will sign and submit the forms to the President of the Senate, Speaker of the House of Representatives, and GAO.

## 9.0 TSTF COMMENTS ON DRAFT SEs

Within 60 days, the TSTF is expected to comment on the draft SEs. The TSTF should identify any factual inaccuracies or request clarification and provide a revision of the traveler, if necessary.

## 10.0 ISSUANCE OF FINAL SEs

Once comments are received from the TSTF, the TSTF PM will review the comments and determine if any need to be addressed by the involved technical branches, DORL, or STSB lead reviewer. If so, the technical reviewers, DORL, and STSB lead reviewer will be requested to address the comments within 2 weeks. The TSTF PM will amend the SEs, as appropriate, to resolve the TSTF comments. If any comments will not be incorporated, the TSTF PM will inform the TSTF before issuing the final SEs.

If resolution of the TSTF comments requires a revision to the traveler, the TSTF PM will notify the TSTF that such a revision is necessary. The TSTF will be requested to provide a revision to the traveler incorporating the needed changes. The final SEs will reference the revised traveler.

If substantive changes are made, the final SEs will be routed through DORL and technical branches for concurrence and OGC for a no legal objection determination. The STSB BC signs the final SEs. The TSTF PM will e-mail the TSTF a copy of the final SEs once they have been issued. The TSTF PM should not wait for the final SEs to be publicly available in ADAMS.

If OGC determined that the SE was not a rule under the CRA or the OMB determined that the SE was a non-major rule and the NRC has submitted GAO-001 and the SE to Congress and GAO, then the NRC may issue the final SE. If OMB determined that the SE was a major rule, then the NRC may issue the final SE 60 days after the date Congress received GAO-001 and the SE from the NRC.

## 11.0 CLOSING THE REVIEW

The TSTF PM is responsible for closing the activity in the work planning system. The activity will be closed when:

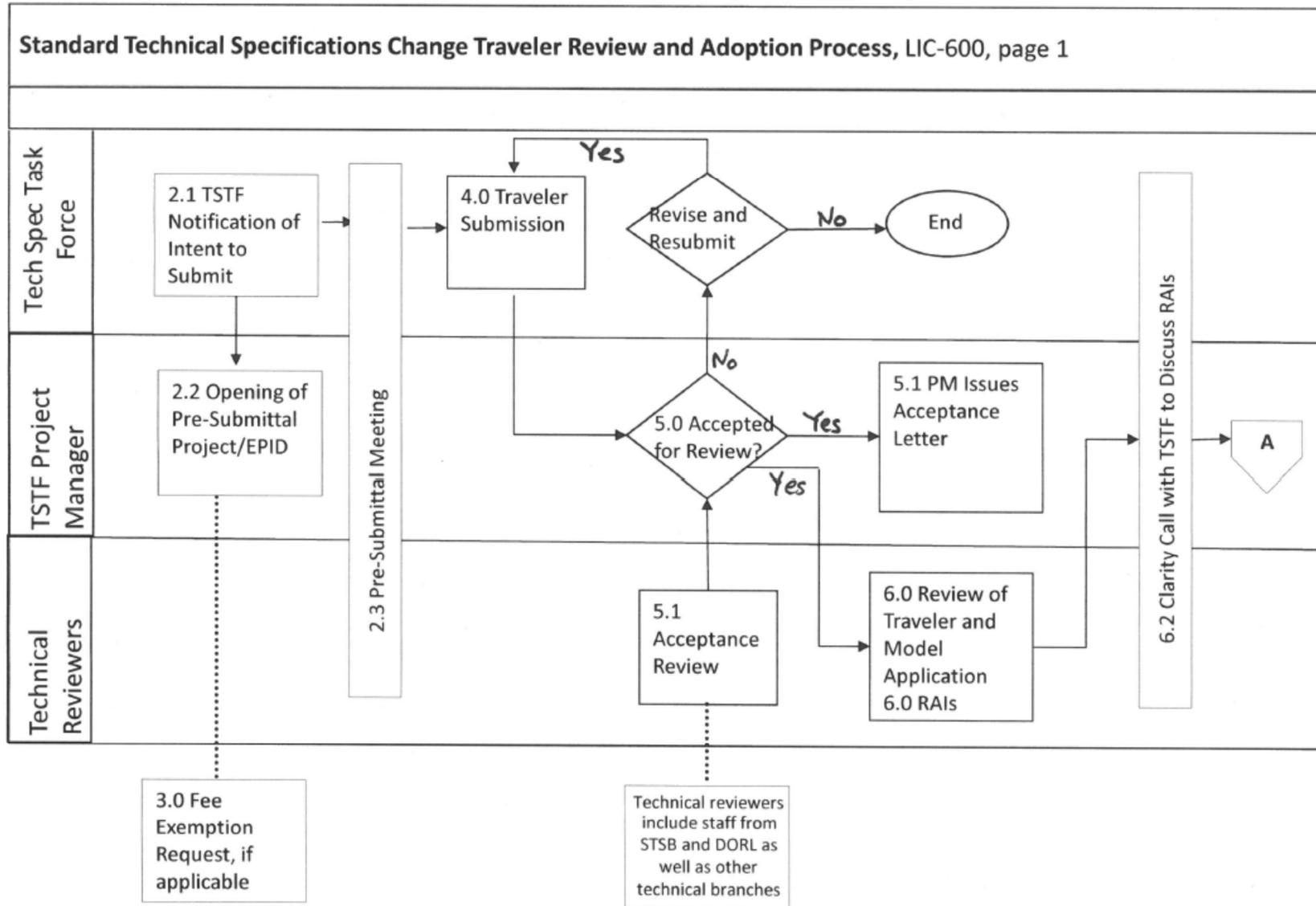
- 1) The traveler is approved. Once the final SEs (or *Federal Register* notice of availability in rare cases) are issued and CRA processing is complete (if applicable); or
- 2) The traveler is disapproved or withdrawn, and the documentation is entered into ADAMS; or
- 3) A revision to a traveler is submitted that is significantly different from the previous version that it will be reviewed *de novo* (meaning that a new review will be started from the beginning without consideration for the findings of the review of the previous version); or

- 4) A traveler review was closed because the TSTF did not provide a complete RAI response within an agreed-upon time frame, or the review was terminated for other reasons.

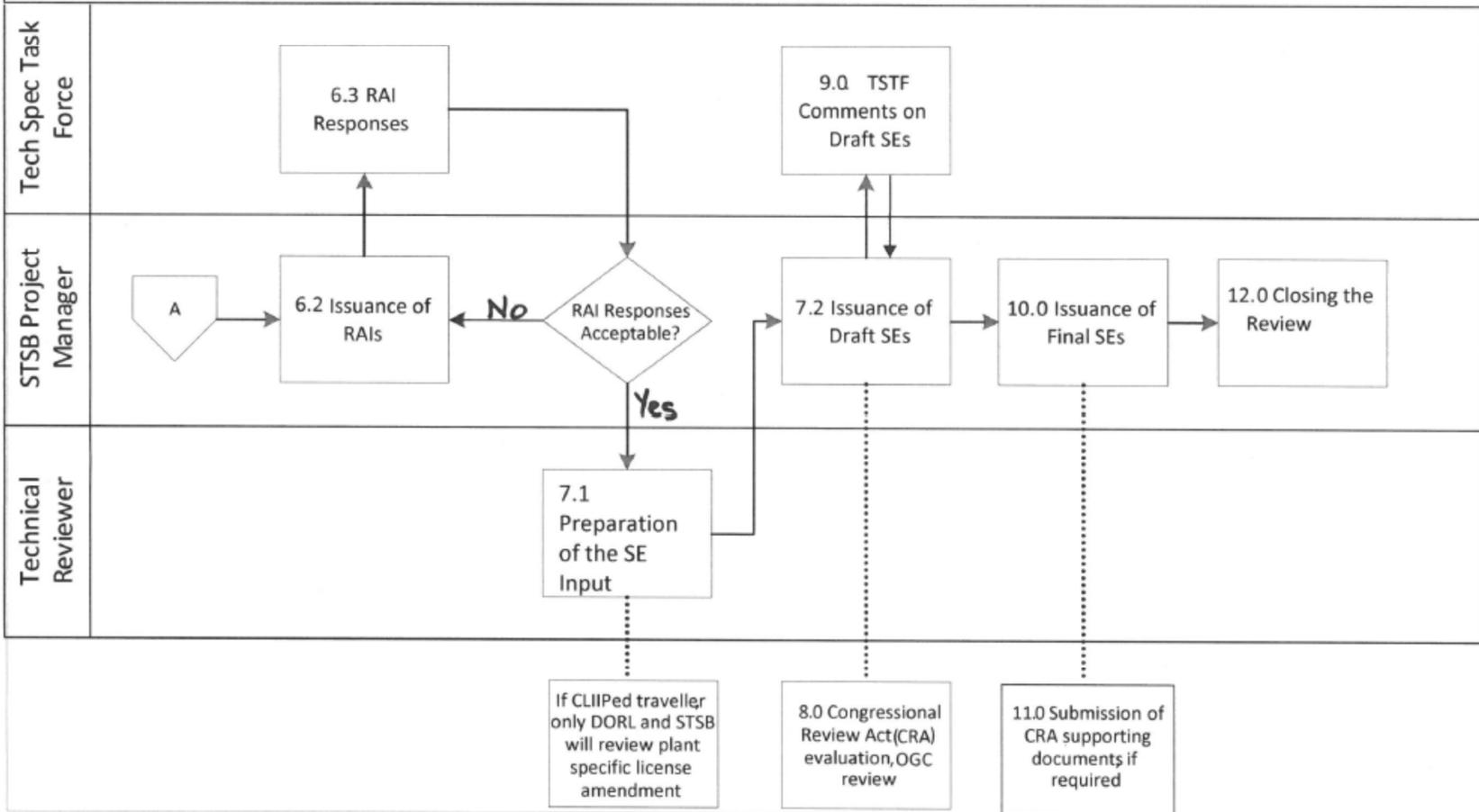
**Appendix C**

**Diagram of Traveler Review Process**

**Office Instruction LIC-600, Revision 1**



**Standard Technical Specifications Change Traveler Review and Adoption Process, LIC-600, page 2**



## Appendix D

### Frequently Asked Questions Regarding Travelers

#### Office Instruction LIC-600, Revision 1

1. What is a model safety evaluation?

Prior to 2016, a dual-purpose model safety evaluation (SE) was issued when approving a traveler. The model SE performed two functions. It documented the U.S. Nuclear Regulatory Commission (NRC) staff's technical and regulatory basis for approving the standard technical specification (STS) change. It also served as a template SE to be used when reviewing the plant-specific license amendment request (LAR) to adopt an approved traveler. Beginning in late 2015, the model SE no longer served two purposes. Instead, a traveler SE is now issued to document the approval of the STS change. In most cases, a second SE (the model SE) is developed from the traveler SE. The model SE and the traveler SE are made publically available and issued to the TSTF. The model SE is to be used as the template for plant-specific adoption. In cases where no model SE is prepared, the staff can use the traveler SE as the template when reviewing LARs to adopt a traveler.

2. What is the difference between a traveler and a CLIP traveler?

Prior to 2007, the NRC staff only issued a model SE and model application for travelers that were approved for use as part of the Consolidated Line Item Improvement Process (CLIP). Travelers that were not part of the CLIP were still changes to the STS, but were approved without documenting the technical or regulatory basis for the approval (no SE or model application were prepared).

Starting in 2007, it was decided that model SEs and model applications would be written for all travelers, documenting the basis for approval. This improved efficiency for both licensees (now providing a model application to follow) and the NRC staff (now having a clear basis for approval documented in the model SE). It also improved openness because all SEs are issued and made publicly available for all STS changes.

#### CLIP travelers

CLIP travelers are travelers which, once approved, will be processed as an LAR in an expedited fashion. CLIP travelers are STS changes that are completely generic in nature and require no plant-specific information or analyses to be submitted in order to adopt the traveler. In these cases, LARs to adopt CLIP travelers are processed by the Division of Operating Reactor Licensing (DORL) PM and the Technical Specifications Branch (STSB) lead reviewer without further review by any technical branches. The LAR review schedule to adopt a CLIP traveler is expedited and completed within 6 months. An LAR submittal claiming to adopt a CLIP traveler cannot vary in any way or include additional changes. If additional changes are made in the LAR or if the licensee makes changes in a manner not addressed in the traveler approval, then the LAR will not be processed as a CLIP amendment. Depending on the variations/additions, the NRC staff can decide to accept the LAR for review (but not as part of the CLIP) or not accept the LAR for review.

### Non-CLIP travelers

Non-CLIP travelers are changes to the STS that may require plant-specific information or analysis in order for a licensee to adopt the change. They will be reviewed on the usual LAR review schedule. All technical branches that reviewed the traveler will also review the LAR to adopt the traveler. The licensee should follow the model application and provide the additional plant-specific information as requested in the model application. The NRC staff will use the model SE as a template. Typically, model SEs for non-CLIP travelers have more bracketed information and NOTES to reviewers with instructions on what needs to be evaluated on a plant-specific basis.

3. How can I determine if a traveler has been approved for plant-specific adoption and whether or not it is a CLIP traveler?

An incoming traveler indicates if it was submitted as part of the CLIP. The NRC SE approving the traveler will indicate if it was reviewed and approved as part of the CLIP. The LAR to adopt the traveler should also indicate if the traveler is part of the CLIP.

Prior to 2007, only CLIP travelers were published in the *Federal Register*. The *Federal Register* notice indicates if the traveler was approved as part of the CLIP. For travelers issued between 2007 and 2016, notices were published in the *Federal Register* announcing the availability for adoption for all travelers (regardless of whether they were CLIP or not). *Federal Register* notices for traveler approvals were discontinued in 2017.

4. What are T-Travelers?

The TSTF sometimes develops a traveler, but decides that it is not cost-beneficial to submit the traveler to the NRC for review and approval. Instead, the travelers are made available for use in plant-specific LARs and posted on the TSTF website for use as templates for plant-specific LARs. The travelers receive a "T" designation to show that they are "templates" (e.g., TSTF-445-T). A licensee can submit an LAR using the template and the NRC will review the submittal as a plant-specific LAR. Approval of the LAR is not approval of the T-traveler template.

5. Can there be a parallel review of travelers and LARs?

An unapproved traveler cannot be used as the basis for the LAR review (e.g., an LAR cannot reference the unapproved traveler). If a licensee decides to submit a plant-specific LAR to implement the same technical specification (TS) change requested in a traveler or reference a traveler that is currently under review, the LAR would have to supply all of the information necessary (i.e., plant-specific justification and technical basis) to support the change.

If there is not sufficient justification, the NRC staff may not accept the LAR. It is most efficient for the licensee to wait until the final SE of the traveler is issued before submitting an LAR.

6. Why is information bracketed in model SEs, model applications, and the STS? Is it proprietary?

In the model application and model SE, information that is plant-specific (e.g., plant name, licensee name, etc.) or information that is different in each vendor's STS (e.g., differing TS numbers) will be bracketed.

In the STS, the brackets are used to indicate items that are plant-specific (e.g., outage times, surveillance completion time, etc.) for a given specification. Brackets are also used to indicate information that may change from plant to plant because of its licensing basis.

This bracketing is not an indication of proprietary information. If there is proprietary information in the model SE, it should be bracketed in boldface font and include appropriate headers and footers. If there is proprietary information in the model application, it should be formatted according to the applicant's procedures and marked in accordance with the requirements of 10 CFR 2.390, "Public inspections, exemptions, requests for withholding."

7. What are the NOTES in model SEs and model applications?

NOTEs are used throughout model applications and model SEs to provide additional information to the reviewers (licensee and NRC staff). This information is typically provided to aid the reviewers in preparing the LAR or SE and provide more detail or explanation of what is expected to be included in the LAR or what NRC staff should be reviewing and why.

The nomenclature for these notes has changed over time - in older model applications and model SEs, the NOTES may have been called "Reviewer's Notes" or "Licensee's Notes."

These NOTES are not to be included in the plant-specific LAR or the SE approving the LAR. The NOTES are typically shown in brackets and italicized.

8. What are the NOTES in the STS?

NOTEs are used in the STS to provide exception to or to explain requirements. These NOTES are part of the TS and must be included in the plant-specific TS. A licensee must include the STS NOTES in its plant's TS in order to adopt the traveler. If a licensee does not include the NOTES in its plant's TS, it is considered a variation from the traveler and the licensee must provide justification as to why the NOTES should not be included in its TS.

STS NOTES are in the format:

----- NOTE -----  
 Not required to be performed until 24 hours  
 after exceeding 25% RTP.  
 -----

9. What are the REVIEWER'S NOTES in the STS?

REVIEWER'S NOTES appear predominantly in the STS Bases and occasionally in the STS (especially the Administrative Controls Section). They are similar to NOTES in the model application or model SE in that they are used to provide instructions to the licensee or NRC staff regarding how to adopt the STS. The REVIEWER'S NOTES are not to be included in plant-specific TS or Bases.

STS REVIEWER'S NOTES are in the format:

-----REVIEWER'S NOTE-----  
 This SR is applied only to Functions of Table 3.3.6.1-1 with required response times not corresponding to DG start time.  
 -----

10. What items are considered variations (previously referred to as deviations) from an approved traveler or CLIP traveler?

Variations are:

- changes to the Specification (including additions, deletions, revised text) in areas that were *not* bracketed in the STS or traveler;
- changes to the Specification (including additions, deletions, revised text) in areas that were bracketed, but the change is not one of the bracketed options; or
- changes to Specifications that were not part of the approved traveler.

Variations are NOT:

- changes which were approved as options/alternatives in the traveler;
- plant-specific TS numbering or titles; or
- plant-specific system names or terminology.

If you are unsure if a change is considered a variation, contact the STSB lead reviewer for assistance. Licensees need to provide plant-specific technical justification for any variations from the approved traveler.

11. How can I interpret or understand the language used in the STS?

For guidance on the formatting and use of language in the STS contact the STSB. Although not endorsed by the NRC, TSTF-GG-05-01, Revision 1, "Writer's Guide for Plant-Specific Improved Technical Specifications" (ADAMS Accession No. ML070660229), may also be helpful.

12. What does a “-A” mean after a TSTF number?

Once a traveler is approved by the NRC, the TSTF uses a “-A” to designate in its systems that the traveler has been approved. Licensees should not reference the “-A” version in their LARs. Unlike topical reports, the “-A” version is not submitted to the NRC and is not in the public domain. The TSTF revises the traveler during the course of the NRC staff review, so that no further changes are needed after the final SE is issued. Therefore, licensees should simply reference the revision of the traveler that the final SE refers to, and not to the “-A” version. If a licensee references the “-A” version, the DORL PM can clarify in the SE the version of the traveler against which the NRC staff reviewed the LAR. Wording similar to the paragraph in italics below can be used in the SE.

*Throughout the LAR, the licensee refers to TSTF-XXX-A, dated Month Day, Year, as a basis for the requested amendment. The NRC staff notes that the “-A” designation added to TSTF-XXX is an industry convention used to indicate that the traveler has been approved by the NRC. TSTF-XXX and TSTF-XXX-A are the same document. However, since TSTF-XXX-A is not an NRC designation, this safety evaluation refers to the technical specification change traveler as TSTF-XXX, Rev. X.*

13. Where can I find a listing of approved travelers that have had issues with their adoption?

Contact STSB.

14. Is there anything special about a TSTF that is based on a topical report?

The NRC staff reviews topical reports and issues an SE explaining the technical basis for the staff’s approval of the topical report. The scope of the topical report may include changes to the TSs. The TSTF will prepare and submit a traveler proposing modification to the STS to incorporate the changes addressed in the approved topical report. The review of the traveler should include verification that the proposed changes are consistent with the changes described in the approved topical report and that any limitations and conditions from the staff’s topical report SE are appropriately reflected in the traveler. Technical justification must be provided for any changes from the topical report.