

## **Clarifying the NEI 06-09 term "Configuration Risk Management Program" in the TS Risk Informed Completion Time (RICT) Program**

The NRC questioned the difference between the TSTF-505 Risk Informed Completion Time (RICT) Program in Section 5.5 of the Technical Specifications (TS) and the NEI 06-09 Configuration Risk Management Program.

The TSTF-505 justification, Section 2.0, "Proposed Change," states:

There is a new Chapter 5 Program entitled, "Risk Informed Completion Time Program" which is invoked when utilizing a RICT. In NEI 06-09 this program is called the Configuration Risk Management Program. That title is not used in the Traveler because some licensees already have a Chapter 5 program of that name serving a different purpose and the proposed name is more descriptive of the purpose of the new program.

Therefore, the TSTF-505 RICT Program is the same as the NEI 06-09 Configuration Risk Management Program.

The NRC staff pointed out that a user of the Technical Specifications (TS) RICT Program would not necessarily have access to the TSTF-505 justification, which may lead to confusion when applying NEI 06-09 in accordance with the TS 5.5 RICT Program. The industry agrees to revise the TS 5.5 RICT Program to add the italicized text shown below:

### 5.5.XX      Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." *This program is called the Configuration Risk Management Program (CRMP) in NEI 06-09-A.* The program shall include the following: