

September 27, 2017

TSTF-17-01
PROJ0753

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Response to NRC Questions on TSTF-505-A, "Provide Risk-Informed Extended Completion Times"

Reference: Letter from T. McGinty and A. Boland (NRC) to Technical Specifications Task Force (TSTF), "Issues with Technical Specifications Task Force Traveler TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b'," dated November 15, 2016

In the referenced letter, the NRC raised concerns with approved TSTF traveler, TSTF-505-A, Revision 1, "Provide Risk-Informed Extended Completion Times." The NRC published in the Federal Register a notice of availability for the Model Safety Evaluation (SE) for plant-specific adoption of TSTF traveler TSTF-505, Revision 1, on March 15, 2012. Currently, several licensees have License Amendment Requests (LARs) under NRC review to adopt risk-informed Completion Times.

On December 13, 2016, the TSTF and the Nuclear Energy Institute (NEI) met with the NRC to discuss the NRC's concerns. Most of the NRC concerns were related to proposed Technical Specifications (TS) Actions related to all trains of a TS required system being inoperable. The industry proposed the following short-term and long-term actions to resolve the NRC concerns:


1. The industry will pursue development of a companion traveler for TSTF-505-A that addresses the NRC issues with Actions related to inoperability of all trains of a TS required system (referred to by the NRC staff as a loss of safety function). Following approval, plants that have adopted TSTF-505-A without these Actions could submit a LAR to adopt the companion traveler. Following NRC approval of the companion traveler, plants that have not adopted TSTF-505-A can adopt TSTF-505-A and the companion traveler in a single LAR.
2. TSTF-505-A allows licensees to choose which Action changes are included in their LAR. The TSTF will recommend to the industry that until the companion traveler is approved by the NRC, licensees submitting LARs to adopt TSTF-505 follow the guidance in the attachments to this letter. Actions related to the inoperability of all trains of a TS required system should not be included in LARs submitted prior to approval of the companion

traveler. Omitting these Actions and incorporating the other changes recommended in the attachments to this letter should allow timely approval of LARs. Attachment 1 contains a list of the Actions revised by TSTF-505-A that should be omitted in LARs submitted prior to approval of the companion traveler. Attachment 1 also includes conforming changes to the TSTF-505-A Section 1.3 TS example and the TS Section 5.5 Administrative Controls program. Attachment 2 contains a list of Actions revised by TSTF-505-A that have conditions on their inclusion in a plant-specific LAR. Attachment 3 contains a revised Model Application for requesting adoption of TSTF-505-A.


3. The proposed actions only apply to future submittals. The licensees with LARs currently under NRC review will decide how to proceed.

The TSTF requests that the NRC rescind the suspension of the approval of TSTF-505-A, Revision 1, and accept LARs to adopt TSTF-505-A that follow the recommendations in the attachments to this letter.

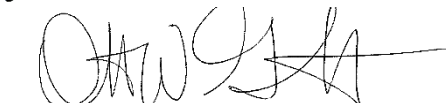
Should you have any questions, please do not hesitate to contact us.




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Enclosure

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