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MEMORANDUM TO: Victor G. Cusumano, Branch Chief  
Technical Specifications Branch  
Division of Safety Systems  
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager /RA/  
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SUBJECT: SUMMARY OF FEBRUARY 21, 2019, QUARTERLY MEETING  
WITH THE TECHNICAL SPECIFICATIONS TASK FORCE

On February 21, 2019, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Technical Specifications Task Force (TSTF). The purpose of the quarterly meeting was to discuss proposals for future TSTF Travelers to modify the Standard Technical Specifications (STS), status and technical topics related to active Travelers currently under review, and paths to resolution for technical or programmatic issues with Technical Specifications, Travelers, and related regulatory documents. The notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML19036A725. A list of attendees is available in ADAMS at Accession No. ML19056A423.

Handouts from meeting are available in ADAMS at the following Accession Numbers.:

Document Title	Accession
Active Traveler Status Report and Priorities from 2/21/2019 Quarterly Meeting	ML19058A023
Rewording of TSTF Proposed Revision to TSTF-541, "Add Exceptions to Surveillance Requirements when the Safety Function is being Performed"	ML19056A426
NRC staff Feedback to TSTF Proposed Revision to TSTF-541, "Add Exceptions to Surveillance Requirements when the Safety Function is being Performed"	ML19056A425
Proposed Path Forward on TSTF-568, "Clarify Applicability of BWR/4 TS 3.6.2.5 and TS 3.6.3.2"	ML19056A424

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Specifically, the following items were discussed:

- I. The TSTF members noted that 2018 was a very productive year.
  - A. 2019 marks the 16th year (2003) of the TSTF as a jointly sponsored Owners' Group activity (24 years as an organization, 1995)
  - B. One change in TSTF membership (Ryan Joyce for Lisa Williams)
  - C. Travelers:
    1. Four travelers were approved:
      - a) TSTF-567, Revision 1, Add Containment Sump TS to Address GSI-191 Issues (PWR) (July)
      - b) TSTF-564, Revision 2, Safety Limit MCPR (BWR) (November)
      - c) TSTF-563, Revision 0, Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program (PWR/BWR/AP1000) (First traveler applicable to all TSTF members)
      - d) TSTF-565, Revision 1, Revise the Limiting Condition for Operation (LCO) 3.0.2 and LCO 3.0.3 Bases (PWR/BWR/AP1000) (Second traveler applicable to all TSTF members)
    2. One new traveler was submitted:
      - (1) TSTF-569, Revision 0, "Revise Response Time Testing Definition" (February)
    3. Five previously approved travelers were unsuspending, and/or had technical issues resolved:
      - a) TSTF-505, Revision 2, Provide Risk-Informed Extended Completion Times (PWR/BWR) (November)
      - b) Traveler TSTF-490, Revision 0, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec" (October)
      - c) TSTF-51, Revision 2, "Revise Containment Requirements during Handling Irradiated Fuel and Core Alterations" (October)
      - d) TSTF-471, Revision 1, "Eliminate Use of Term Core Alterations in Actions and Notes" (October)
      - e) TSTF-286, Revision 2, "Operations Involving Positive Reactivity Additions" (October)

- D. The TSTF also discussed opportunities for improvement. After examining the travelers approved in 2018, the TSTF noted:
1. The NRC review time (in calendar days) was an average of 47 percent longer than the schedule published in the traveler acceptance review letter.
  2. The NRC projected review hours in the acceptance review letter were overestimated by an average of 34 percent.
  3. The NRC noted that travelers are often more akin to research projects than straightforward reviews, making accurate schedule estimates problematic. The TSTF and NRC agreed that pre-submittal meetings should discuss process steps and potential complications to assist the NRC in providing a more accurate schedule estimate.

## II. T-Travelers

- A. The NRC had previously asked the TSTF to consider providing information-only copies of T-Travelers to the NRC. T-Travelers are developed by the industry but are not submitted to the NRC for review ("T" stands for "template").
- B. Background provided by TSTF on T-Travelers:
- There are 57 approved T-Travelers
  - 32 are Bases-only changes
  - 4 only affect the Improved Standard Technical Specifications (ISTS) NUREGs
  - 9 are editorial changes
  - 12 would require a license amendment request (LAR) to adopt (TS changes)
  - 9 were incorporated into Revision 3.1 or 4 of the ISTS
- C. The TSTF did not agree to provide T-Travelers to the NRC for review, since most are Bases-only changes that do not require NRC review and approval.
- D. (ACTION) The NRC suggested, and the TSTF concurred, that future quarterly meetings would include an agenda item for the TSTF to brief the NRC on new T-Travelers for their awareness, but the TSTF would not provide copies of the T-Travelers.

## III. Traveler Adoption Issues

- A. The NRC polled the project managers and did not identify any notable issues with traveler adoptions.

## IV. Issues with Approved travelers:

- A. TSTF-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control"
1. NRC (Russ Haskell) recommended waiting for more plants to go through outages before submitted the follow-on traveler. Additional outages may provide more items to consider for the supplement/improvement traveler.

2. The TSTF has reached out to licensees for feedback on improvements. Feel they have a pretty good handle on what the issues are, included outage feedback from several plants already. The TSTF is planning for the 3<sup>rd</sup> quarter 2019 for follow-on traveler.
  3. NRC (Vic Cusumano) asked the TSTF if traveler TSTF-542 provided the benefit that industry expected. The TSTF answered yes, they've received positive feedback from licensees.
- B. TSTF-505, Revision 2, "Provide Risk Informed Extended Completion Times – RITSTF Initiative 4B"
1. TSTF (Dave Gullot) – Exelon was surprised by acceptance review questions – industry felt they should have been requests for additional information (RAIs) instead, but they worked through and responded. They are taking lessons learned from these questions and applying to rest of Exelon fleet and sharing with industry to improve future submittals.
  2. The TSTF will provide an update on the planned submittals for adoption of TSTF-505 and Title 10 of the *Code of Federal Regulations* (10 CFR) 50.69 LARs at the next quarterly meeting in May 2019.
  3. It was clarified that if applicable, the information presented in Table 1 of TSTF-505, will be included in Enclosure 1 of LARs to adopt TSTF-505. The LAR will not have a Table 1 in it, nor will the information necessarily be presented in a tabular form.

V. Travelers Currently under NRC Staff Review

- A. TSTF-541, Revision. 0, "Add Exceptions to Surveillance Requirements When the Safety Function is Being Performed"
1. In January, the TSTF had provided a proposed revision to TSTF-541 to address NRC concerns. The proposed revision is in ADAMS at Accession No. ML19056A425. On February 21, 2019, the NRC provided suggested changes. The TSTF and NRC walked through the changes and agreed to revisions that would address both TSTF and staff concerns. The recommended changes to the model application are in ADAMS at Accession No. ML19056A426.
  2. The TSTF agreed to revise the traveler and to review and revise the traveler justification to be consistent with the changes to the model application.
  3. The TSTF will provide a draft traveler to the NRC for review by the end of March, followed by formal submittal.
- B. TSTF-566, Revision 0, "Revise Actions for Inoperable RHR Shutdown Cooling Subsystems"
1. The final safety evaluation (SE) approving TSTF-566 was issued on February 21, 2019.

- a) This is the second approval in 2019.
- b) Projected submittal of amendment requests to adopt TSTF-566:
  - (1) 2019Q2 1 submittal
  - (2) 2019Q3 2 submittals
  - (3) 2019Q4 8 submittals
  - (4) 2020Q1 1 submittal
  - (5) 2021Q1 1 submittal

C. TSTF-568, Revision 0, "Clarify Applicability of BWR/4 TS 3.6.2.5 and TS 3.6.3.2"

- 1. TSTF (Ryan Joyce reviewed presentation/handout in ADAMS at Accession No. ML19056A424).
  - a) The existing Applicability notes are removed.
  - b) The TS 3.6.2.5, "Drywell-to-Suppression Chamber Differential Pressure," Applicability is changed to Mode 1 with reactor power > 15 percent Reactor Thermal Power. This is supported by NRC-approved analyses for the three applicable plants.
  - c) The TS 3.6.3.2, "Primary Containment Oxygen Concentration," Applicability is changed to Mode 1.
  - d) The Required Action for not meeting the LCO is changed to a requirement to restore compliance within 72 hours. LCO 3.0.4.c permits entering the Applicability without meeting the LCO.
  - e) The Bases will state that entering Required Action A.1 prior to a shutdown without intention to restore compliance prior to exiting the Applicability is acceptable in this case.
- 2. The NRC did not object to the presentation of eliminating the Applicability exceptions in lieu of an Action.
- 3. The NRC Reactor Systems branch questioned the Mode 1 Applicability for primary containment oxygen concentration, as it would permit indefinite operation in Mode 2 (reactor critical) without meeting the limit.
- 4. The NRC stated that the last revision of 10 CFR 50.44, Combustible Gas Control, made containment inerting part of severe accident management, not part of the design-basis accident response. The recommended that the TS be changed from 10 CFR 50.36(c)(2)(ii) Criterion 2 to Criterion 4. The TSTF believed this raises the issue of whether it should be subject to a TS.
- 5. (ACTION) The TSTF agreed to review the Applicability of TS 3.6.3.2 and the implication of the 10 CFR 50.44 change.

## D. TSTF-569, Revision 0, "Revise Response Time Testing Definition"

1. Draft SE package to be issued by March 29, 2019, subsequent to the meeting the date was moved to April 30, 2019.
2. Final SE package to be issued by July 28, 2019

## VI. Traveler Review Priorities (See handout)

## A. TSTF-541, "Add Exceptions to Surveillance Requirements When the Safety Function is Being Performed," Low priority

## B. TSTF-568, Revision 0, "Clarify Applicability of BWR/4 TS 3.6.2.5 and TS 3.6.3.2," Medium priority

1. Changed from Low to Medium due to relative ranking of remaining travelers.

## C. TSTF-569, Revision 0, "Revise Response Time Testing Definition," High priority

## VII. Technical Issues

## A. Update on Industry Activities Related to Pressure Boundary Leakage Definition

1. TSTF-554, "Revise Reactor Coolant Leakage Requirements," has completed industry review. A pre-submittal teleconference will be requested in mid-March, followed by submittal. Subsequent to the meeting, the TSTF provided the draft traveler (ADAMS Accession No. ML19084A029).

## B. TSTF-573-T, "Correct RPS Bases for MSIV and TSV Functions"

1. The NRC had no objections to TSTF-573 and supported the use of the 12 -hour Completion Time Required Action when using an RPS Test Box.
2. NRC (Vic Cusumano) to get back to the TSTF regarding follow-up from the January 23 teleconference.

## C. TS SRs for digital platform based RPS and ESFAS.

1. The NRC noted actions by Vogtle 3 and 4 to revise the instrumentation TS to reflect digital capabilities, which may be applicable to operating plant TS as plants implement digital systems. Jim Miksa stated that at the December 2018 joint Licensing Committee meeting, a core team was formed to monitor these activities (especially the NEI 06-02 appendix) and to develop a guidance document with a standard format and approach for TS and Bases on digital systems.

## VIII. Management Discussion

## A. Mirella Gavrilas (Director, Division of Safety Systems (DSS) and Shaun Anderson (Acting Deputy Director, DSS) joined the meeting for a management discussion.

- The TSTF and NRC reported on the agreement to resolve TSTF-541 issues.

- The TSTF described the planned traveler to address BWR Safety/Relief Valve excessive reporting.
- NRC is concerned that the BWROG has been working to resolve safety/relief valve (S/RV) sticking issues since 1998 without apparent success and the staff is growing impatient. Mirella supported a TS change to address the reporting issue while working on technical solutions in parallel.
- Potential BWR Safety/Relief Valve Change (2rd Quarter 2019)

IX. Future Traveler submittals

- Reactor Coolant System Pressure Boundary Leakage (1st Quarter 2019)
- Potential Steam Generator Tube Inspection Change (3rd Quarter 2019)
- SGTube – April 2019 more detailed meeting with materials staff, then pre-application meeting. Caroline will be the lead.
- Potential BWR Safety/Relief Valve Change (2rd Quarter 2019)
- Reactor Pressure Vessel Water Inventory Control (RPV WIC) Improvement Traveler (3rd Quarter 2019)

X. Remaining Quarterly Meetings with TSTF in 2019 will be on the following Thursdays:  
May 9, August 1, and November 14.

There were no final determinations made during the meeting. No members of the public had comments.

Project No. 753

cc: See next page

SUBJECT: SUMMARY OF FEBRUARY 21, 2019, QUARTERLY MEETING WITH THE TECHNICAL SPECIFICATIONS TASK FORCE DATED: April 9, 2019

Project No. 753

Enclosure:  
As stated

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Jerome Bettle

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Craig Harbuck

Gordon Curran

Robert Beaton

Stewart Bailey

Steve Dinsmore

Steve Jones

Shaun Anderson

**ADAMS Accession Nos.: Package: ML19056A435, Meeting summary: ML19078A269, Meeting handouts ML19058A023, ML19056A426, ML19056A425, ML19056A424**

**\*concurred via e-mail**

**NRR-106**

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