



CHIEF FINANCIAL
OFFICER

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 8, 2019

Technical Specifications Task Force
11921 Rockville Pike, Suite 100
Rockville, MD 20852

Dear Members:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated May 7, 2019, requesting a fee waiver under Title 10 of the *Code of Federal Regulations* (10 CFR) 170.11(a)(1)(ii) for NRC review of Technical Specifications Task Force (TSTF) traveler TSTF-554, Revision 0, "Revise Reactor Coolant Leakage Requirements."

The NRC has established regulations for the granting of fee exemptions under 10 CFR 170.11, "Exemptions," which may be applied for in accordance with 10 CFR 170.5, "Communications." The NRC staff has reviewed your request based on the following regulations, 10 CFR 170.11(a)(1)(ii) and 10 CFR 170.11(a)(13):

10 CFR 170.11(a) No application fees, license fees, renewal fees, inspection fees, or special project fees shall be required for: (1) A special project that is a request/report submitted to the NRC— . . . (ii) When the NRC, at the time the request/report is submitted, plans to use the information in response to an NRC request from the Office Director level or above to resolve an identified safety, safeguards, or environmental issue, or to assist the NRC in generic regulatory improvements or efforts (e.g. rules, regulatory guides, regulations, policy statements, generic letters, or bulletins).

10 CFR 170.11(a)(13) All fee exemption requests must be submitted in writing to the Chief Financial Officer in accordance with § 170.5¹, and the Chief Financial Officer will grant or deny such requests in writing.

In your letter you stated that the traveler supports the NRC's generic regulatory improvements because it is a clarification of the reactor coolant pressure boundary (RCPB) leakage requirements. The traveler process is a proven method for the industry and the NRC to exchange information, which culminates in an NRC safety evaluation documenting the acceptability of the proposed technical specifications changes.

¹ 10 CFR 170.5 provides that "All communications concerning the regulations in this part should be addressed to the NRC's Chief Financial Officer, either by mail to the U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; by hand delivery to the NRC's offices at 11555 Rockville Pike, Rockville, Maryland; or, where practicable, by electronic submission, for example, via Electronic Information Exchange, or CD-ROM."

The NRC's approval of the generic traveler will also provide a template for licensees to follow when adopting the revised technical specifications. Further, the traveler will be incorporated into the next revision of the NRC's generic Standard Technical Specifications (STS) (NUREG-1430 through NUREG-1434, and NUREG-2194), providing durable guidance on the issue for licensees and the NRC.

The STS and many plant-specific technical specifications define RCPB leakage as leakage through a nonisolable fault in a reactor coolant system component body, pipe wall, or vessel wall. Historically there has been some confusion regarding the requirements for RCPB leakage. The approval of the traveler would assist the NRC in its generic regulatory improvements, by providing an approved generic STS change that licensees could implement via the traveler adoption process, in lieu of the staff issuing a Regulatory Issue Summary to address the issue.

The NRC staff concludes that your request for NRC review of TSTF-554, Revision 0, "Revise Reactor Coolant Leakage Requirements," meets the criteria under 10 CFR 170.11(a)(1)(ii) because the guidance will assist the NRC in generic regulatory improvements or efforts; therefore, the fee waiver request is approved.

If you have any technical questions regarding this matter, please contact Mrs. Michelle Honcharik at 301-415-1774. Please contact Mr. William Blaney, of my staff, at 301-415-5092 for any fee-related questions.

Sincerely,

/RA/

Maureen E. Wylie
Chief Financial Officer

