



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

June 26, 1991

MEMORANDUM FOR: Charles E. Rossi, Director
Division of Operational Events Assessment

FROM: Christopher I. Grimes, Chief
Technical Specifications Branch

SUBJECT: SUMMARY OF MEETING WITH THE OWNERS GROUPS EXECUTIVES

On June 20, 1991, the Owners Groups (OG) executives met with NRR senior management to discuss status of issues related to the new Standard Technical Specifications (STS). The meeting attendees are listed in Enclosure 1.

The status of completion times (STS Section 1.3) and operability (STS Section 1.5) were summarized as described in the summary of the meeting on June 10, 1991. The completion times issue is substantially resolved, although the OG may submit additional editorial changes. The operability issue was characterized as resolved in principle, while additional effort will be necessary to resolve the specific language needed to implement the principle. Mr. Russell indicated that a definition of loss-of-function should be included in Section 1 of the new STS to highlight its importance to the Support System Operability Program to be included in Section 5; the OG indicated that may not be consistent with the intended usage for definitions in Section 1.

Mr. Poindexter described the OG activities related to a joint consistency review, and the substantial effort involved. The staff indicated that it would accept partial comments and that additional comments on the new STS would be considered after the end of the comment period on July 31, 1991. The OG will notify the staff of the status of its efforts by July 1, 1991. The owners were encouraged to identify specific technical concerns early, while language and editorial details could be described later.

Mr. Russell described the status of the technical guidance on degraded conditions and operability which will be incorporated into Section 9900 of the Inspection Manual. He also described the staff's plans to conduct training on the new guidance, inform the Commission on related matters, and distribute the guidance with a generic letter. The staff indicated that, although the new guidance is not inconsistent with the approach being taken for the new STS, the STS approach would not be as restrictive.

Mr. Poindexter discussed a proposed comment resolution process, as described in Enclosure 2. The staff agreed conceptually with the process, the details will be worked out before the comments are submitted. The staff requested that the OG prepare the documentation for resolution of issues; the staff will comment, if necessary. The staff requested that the OG focus on specific technical issues that need to be resolved. At Mr. Russell's request, OG representatives described some general examples of the kind of technical issues they have identified; the examples related primarily to similarities and differences between the NSSS versions of the STS.

RETURN TO REGULATORY CENTRAL FILES

OTM-6
meeting
RF03
1/10

MEETING ATTENDEES - JUNE 20, 1991

T. E. Murley	NRC	
W. T. Russell	NRC	
C. E. Rossi	NRC	
C. I. Grimes	NRC	
C. H. Poindexter	Baltimore Gas & Electric	CEOG
W. T. Cottle	Entergy Operations	
M. R. Edelman	Centerior Energy	
L. Bush	Commonwealth Edison	WOG
M. Bryan	TVA (Watts Bar)	
R. Whetzel	NUS (VEPCo)	
K. Wilson	Florida Power	B&WOG
P. North	Duke Power	B&WOG
J. L. Robertson	Entergy Operations	BWROG
K. McCoy	Georgia Power	
B. Woods	Southern California Edison	CEOG
B. Montgomery	Baltimore Gas & Electric	
T. Tipton	NUMARC	

DRAFT PROCESS

(From comment submittal to appeal)

The following process will be followed for all chapters, however use and application shall be completed first.

General:

- 1) Telecons shall be held on a weekly basis with the Chairmen and Chris Grimes to track progress. All Telecons will be documented for agreements reached and issues discussed.
- 2) Telecons shall be held among the industry chapter coordinators and their OTSB contact on a bi-weekly basis for discussion/clarification on technical issues and to develop agendas for meetings. All Telecons will be documented for agreements reached and issues discussed.
- 3) Meetings will be held when there is an identified need to resolve issues, and will in all cases; be held to a previously specified and agreed to agenda, and provide adequate notice for preparation (2 weeks).
- 4) A procedure will be used to assure meetings are effective and results are promptly documented and communicated:
 - a) issues which may effect another chapter will be identified;
 - b) issues (both open and closed), resolutions, and areas of dispute will be documented;
 - c) responsibility will be assigned for open items;
 - d) the above items as a minimum will be included into the meeting minutes. Minutes must be issued no later than 2 working days after the meeting.

PROCESS

- 1) Telecons will be held with chapter coordinators and OTSB contacts to clarify comments on the draft NUREGs. Meetings will be held only if necessary.
- 2) NRC will issue a written disposition of all industry comments with specific reasons cited when comments are not adopted verbatim.
- 3) Industry and NRC will meet to resolve those comments not adopted.
- 4) Areas of dispute will be clearly identified and defined. Appeal items (as determined by the Owners Groups) will be identified as quickly as possible for appeals to be scheduled and conducted.

DRAFT

ADMIN CONTROLS CHAPTER

Industry comments will suggest establishing more explicit and restrictive requirements for the contents of the TSIP Admin Controls Chapter. Those items clearly and effectively covered in the regulations or other plans required as a condition of the license (eg. 50.54 (a) - QA Plan) need not be repeated in the TS's. This will assure adequate enforceability while centralizing the controls for these issues in a single, well-focused plan or document. This will reduce the level of detail to that needed for the operator while retaining those needed legally.

In general, we would relocate the discussions of Unit Staff Qualifications, Training, Record Keeping, Audits and would significantly reduce the level of detail for the responsibilities of the on and off-site review committees. All of these are more clearly addressed in the QA Plan and elsewhere. We would clearly retain BASES control, the discussion of Plans, Programs and Manuals and the basics of the Admin Program associated with Operability.

The OG asked for the staff's reaction to the proposal in Enclosure 3 which was developed to address owners' concerns regarding STS administrative controls and bases. The staff indicated that the concept, which would attempt to avoid duplicating specific regulatory requirements in the STS, was acceptable. Mr. Russell further indicated that the provisions for control of the STS bases should be described in Section 5 of the STS and should be consistent with the practices for facility changes under 10 CFR 50.59; the STS bases should be treated the same as the FSAR.

The next executive meeting is tentatively scheduled for August 1, 1991 at the NRC offices. The staff requested that the OG be prepared to discuss important technical issues related to their comments.

Original signed by:

Christopher I. Grimes, Chief
Technical Specifications Branch
Division of Operational Events Assessment

Enclosures:
As stated

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