



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

August 31, 1995

LICENSEES: Union Electric Company
Wolf Creek Nuclear Operating Corporation

FACILITIES: Callaway Plant
Wolf Creek Generating Station

SUBJECT: SUMMARY OF AUGUST 17, 1995, MEETING WITH UNION ELECTRIC COMPANY
AND WOLF CREEK NUCLEAR OPERATING CORPORATION TO DISCUSS
CONVERSION OF TECHNICAL SPECIFICATIONS TO THE IMPROVED STANDARD
TECHNICAL SPECIFICATIONS (TAC NO. M88741, CALLAWAY; TAC
NO. M89578, WOLF CREEK)

On August 17, 1995, representatives from the U.S. Nuclear Regulatory Commission (NRC) met with representatives from the Union Electric Company and the Wolf Creek Nuclear Operating Corporation (the licensees) to discuss the status of the current application for technical specification improvements (TSI) and the conversion to the improved standard technical specifications (ISTS). The meeting was held at the St. Louis Airport Marriott Hotel, St. Louis, Missouri. A list of attendees is attached.

Background:

In late 1993, the licensees met with the NRC staff to discuss their plans for TSI using the guidance of the policy statement issued on July 23, 1993. The licensees would jointly prepare amendment requests that would incorporate line item improvements as well as other improvements using the four criteria of the policy statement. This would save the licensees money and the NRC staff time because the amendments would be essentially identical. Both licensees had considered full conversions to the ISTS, but decided against that because of the projected high cost.

In late May 1994, the licensees submitted their TSI amendment request. At the time of the meeting, the safety evaluation had been written and the amendment for Wolf Creek was undergoing staff review and concurrence.

Summary:

The NRC staff discussed the current efforts and status of ISTS conversions and emphasized that ISTS conversions would be given priority in reviewing their applications. The following points were stressed:

1. In this time of budget reductions the NRC must make decisions on how to use resources. Conversion to ISTS will command a higher priority than requests such as TSI. The current goal for completion of review and approval of full conversion packages is 6 months. The current limited TSI approach pursued by Callaway and Wolf Creek is not, in hindsight, an efficient way to achieve the burden reductions and other benefits of the ISTS. The budget reductions and a

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substantial increase in plans for complete conversions will inhibit future limited TSI approaches.

2. Because the NRC currently has staff available, a licensing action inventory reduction program is moving ahead in an attempt to reduce actions and improve the system to handle requests more efficiently. By adopting the ISTS, the staff expects to achieve a substantial reduction in the number of amendment requests in the future.
3. Experience like that demonstrated by the BWR/6 Owners has demonstrated that cooperating with other plants and making a common submittal would achieve greater efficiency for technical specification improvements.
4. ISTS will have the following benefits:
 - a. The new format is easier for operators to follow and makes finding items easier.
 - b. Uniformity among utilities makes discussion of problems easier.
5. Conversion to ISTS by "bits and pieces" is not efficient for the licensee or the NRC. This requires more resources on the part of NRC and the licensee. Also, priority of the individual parts will not be as high as for conversions.
6. Issues that come up that are applicable to other units should be handled through the Owners Groups so that generic positions can be established, thus saving resources for licensees and the NRC and achieving greater standardization and consistency in the regulatory requirements for all plants.
7. For conversions to ISTS and TSI, before the safety analysis report (SAR) is updated, the licensees must commit to handling the relocated technical specifications as if the SAR had been updated. This will then require any changes to be reviewed in accordance with 10 CFR 50.59.
8. Both licensees were encouraged to contact licensees that have completed ISTS conversions to obtain more detailed information regarding the costs and benefits. The licensees were also encouraged to contact NEI to obtain the draft industry guidance on the ISTS conversion process.

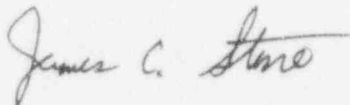
The licensees expressed the following comments and reservations regarding full conversion:

1. With two utilities, some economies were realized in the development of the TSI application. This will require only one review by NRC, thus saving resources.

2. Cost/benefit study of conversion to ISTS is difficult. Cost can be captured and quantified, but benefit is not as easy to quantify.
3. Both licensees had considered conversion to ISTS before the TSI program was started. Based on their analysis at the time, they had concluded it was not economical to convert to the ISTS.
4. A major concern is the rewriting of existing documents (plant operations, surveillance, etc.) and at some point changing to the new system. The operators and technicians are used to the current procedures and with a wholesale conversion, errors will be introduced into the system. Training of operators and technicians in the new procedures will also present a challenge.

The following conclusions were reached during the meeting:

1. The NRC will complete the review of the TSI amendment for Callaway and Wolf Creek as efficiently as possible.
2. Both licensees are reevaluating the cost/benefit of moving to full conversion to ISTS. No schedule was established for completion of the reevaluation.



James C. Stone, Senior Project Manager
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Office of Nuclear Reactor Regulation

Docket Nos. 50-482
and 50-483

Attachment: Meeting Attendees

cc w/att: See next pages

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CALLAWAY/WOLF CREEK MEETING

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AUGUST 17, 1995

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Wolf Creek

R. Flannigan
S. Wideman
C. Younie

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DISTRIBUTION:

Docket File	PUBLIC
PD4-2 and PD3-3 Reading	WRussell/FMiraglia
JRoe	EGA1
JStone	RWharton
EPeyton	EImbro
OGC	EJordan
NRC Participants	ACRS (4)
JMitchell, EDO	BMcCabe, EDO
WAxelson, RIII	JDyer, RIV

DOCUMENT NAME: WC8-17.MTS

OFC	PDIV-2/LA	PDIV-2/PM
NAME	EPeyton	JStone:ye
DATE	8/31/95	8/31/95

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WAxelson, RIII	JDyer, RIV

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