

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

November 18, 1986

Pocket Nos: 50-373/374, 50-387/388, 50-397/410, and 50-341/354

LICENSEES: Commonwealth Edison Company Pennsylvania Power and Light Company Washington Public Power Supply System Niagara Mohawk Power Corporation Detroit Edison Company Public Service Electric & Gas Company

FACILITIES: La Salle County Station, Units 1 and 2 Susquehanna Steam Electric Station, Units 1 and 2 WPPSS Nuclear Project No. 2 Nine Mile Point Nuclear Station, Unit 2 Fermi-2 Hope Creek Generating Station

SUBJECT: BWR PROJECT DIRECTORATE NO. 3 COUNTERPART MEETING SEPTEMBER 9, 1986

On September 9, 1986, the NRC staff met with utility representatives with projects assigned to BWR Project Directorate No. 3 (BWD-3) to discuss relevant licensing issues. The purpose of this meeting was to improve the lines of communication between the NRC and the licensees.

Presentations on licensing issues were presented by hoth NRC staff and utility representatives. The topics of major interest included: the Sholly process, intrepretation of 10 CFR Part 50.59, the Technical Specification Improvement Program, and discretionary enforcement. Interest was also expressed regarding Mr. Sorensen's presentation on utility performance indicators.

The NRC staff was pleased with the willingness of the utilities to attend and participate in this type of a meeting and encouraged the utilities to partitate more aggressively in the development of agenda for future meetings. The NRC staff expressed the hope that this meeting was beneficial to all participants and that these types of meetings may continue.

Enclosure 1 contains the agenda; Enclosure 2 contains the meeting handouts; and Enclosure 3 contains the list of Attendees.

8701130048 870109 PDR FOIA SHOLLY86-855 PDR At the close of the meeting, the utility representatives were asked to provide comments either formally or through their project managers.

Elinon G. aderen

Elinor G. Adensam, Director BWR Project Directorate No. 3 Division of BWR Licensing

Enclosure: As stated

cc: See next page

Mr. B. Ralph Sylvia Detroit Edison Company

cc:

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Mr. Dennis R. Hahn, Chief Nuclear Facilities and Environmental Monitoring Section Office Division of Radiological Health P. O. Box 30035 Lansing, Michigan 48909

Mr. Robert Woolley Acting Supervisor-Licensing The Detroit Edison Company Fermi Unit 2 6400 No. Dixie Highway Newport, Michigan 48166

Mr. Walt Rogers. U. S. Nuclear Regulatory Commission Pesident Inspector's Office 6450 W. Dixie Highway Newport, Michigan 48166

Monroe County Office of Civil Preparedness 963 South Raisinville Monroe, Michigan 48161 Fermi-2 Facility

Ronald C. Callen Adv. Planning Review Section Michigan Public Service Commission 6545 Mercantile Way P. O. Box 30221 Lansing, Michigan 48909

Regional Administrator, Region III U. S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137 Mr. Dennis L. Farrar Commonwealth Edison Company

cc: Philip P. Steptoe, Esquire Suite 4200 One First National Plaza Chicago, Illinois 60603

Assistant Attorney General 188 West Randolph Street Suite 2315 Chicago, Illinois 60601

Pesident Inspector/LaSalle, NPS U.S. Nuclear Regulatory Commission Pural Route No. 1 P.O. Box 224 Marseilles, Illinois 61341

Chairman La Salle County Board of Supervisors La Salle County Courthouse Ottawa, Illinois 61350

Attorney General 500 South 2nd Street Springfield, Illinois 62701

Chairman Illinois Commerce Commission Leland Building 527 East Capitol Avenue Springfield, Illinois 62706

Mr. Gary N. Wright, Manager Nuclear Facility Safety Illinois Department of Nuclear Safety 1035 Outer Park Drive, 5th Floor Springfield, Illinois 62704

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John W. McCaffrey Chief, Public Utilities Division 160 North La Salle Street, Room 900 Chicago, Illinois 60601 Mr. C. V. Mangan Niagara Mohawk Power Corporation

cc:

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Mr. Paul D. Eddy New York State Public Serice Commission Nine Mile Point Nuclear Station -Unit II P.O. Box 63 Lycoming, New York 13093

Mr. Richard M. Kessel Chair and Executive Director State Consumer Protection Board 99 Washington Avenue Albany, New York 12210 Mr. Harold W. Keiser Pennsylvania Power & Light Company

cc:

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Mr. William E. Barberich Manager-Nuclear Licensing Pennsylvania Power & Light Company 2 North Ninth Street Allentown, Pennsylvania 18101

Mr. R. Jacobs Pesident Inspector P.O. Box 52 Shickshinny, Pennsylvania 18655

Mr. R. J. Benich Services Project Manager General Electric Company 1000 First Avenue King of Prussia, Pennsylvania 19406

Mr. Thomas M. Gerusky, Director Bureau of Radiation Protection Resources Commonwealth of Pennsylvania P. O. Box 2063 Harrisburg, Pennsylvania 17120

Robert W. Alder, Esquire Office of Attorney General P.O. Box 2357 Harrisburg, Pennsylvania 17120

Mr. William Matson Allegheny Elec. Coorperative, Inc. 212 Locust Street P.O. Bxo 1266 Harrisburg, Pennsylvania 17108-1266 Susquehanna Steam Electric Station Units 1 & 2

Mr. W. H. Hirst, Manager Joint Generation Projects Department Atlantic Electric P.O. Box 1500 1199 Black Horse Pike Pleasantville, New Jersey 08232

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania Mr. G. C. Sorensen, Manager Washington Public Power Supply System

cc:

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Mr. Curtis Eschels, Chairman Energy Facility Site Evaluation Council Mail Stop PY-11 Olympia, Washington 98504

P. L. Powell, Licensing Manager Washington Public Power Supply System P. O. Box 968, MD 9568 Richland, Washington 99352

Mr. W. G. Conn Rurns and Roe, Incorporated c/o Washington Public Power Supply System P. O. Box 968, MD 994E Pichland, Washington 99352

P. B. Glasscock, Director Licensing and Assurance Washington Public Power Supply System P. O. Box 968, MD 280 Richland, Washington 99352

Mr. C. M. Powers WNP-2 Plant Manager Washington Public Power Supply System P. O. Box MD 927M Richland, Washington 99352 WPPSS Nuclear Project No. 2 (WNP-2)

Regional Administrator, Region V U.S. Nuclear Regulatory Commission 1450 Maria Lane, Suite 210 Walnut Creek, California 94596

MEETING SUMMARY DISTRIBUTION

referre

Docket No(s): 50-373/374/387/388/397/410/341/354 NRC PDR Local PDR BWD #3 r/f J. Partlow E. Adensam Attorney, OGC E. Jordan B. Grimes ACRS (10) Project Manager <u>Listed Below</u> E. Hylton

NRC PARTICIPANTS

- E. Adensam
- R. Bernero
- E. Hylton
- D. Wagner
- J. Bradfute
- R. C. Barr
- M. Haughey
- A. Bournia
- M. Campagnone M. D. Lynch

FOIH . 86. 855 H/4.

bcc: Applicant & Service List

ENCLOSURE 1

COUNTERPART MEETING FOR

BWD-3 HELD ON SEPTEMBER 9, 1986

NAME

AFFILIATION

E. G. Adensam R. Bernero* E. Hylton D. Wagner B. Preston R. Beckwith L. A. Reiter John O. Bradfute G. C. Sorensen Pat Powell Larry Aeschliman R. C. Barr Mary Haughey A. F. 7allnick P. E. Francisco Tom Hammerick Mike Turbak Anthony Bournia C. M. Allen Thomas Randazzo Rob Woollev Mari-Josette Campagnone C. T. Coddington R. R. Sgarro W. E. Barberich M. David Lynch Steve Frost Paul Christofakis Paul Eddy Gerald Klingler Steve Washington Dennis Vandeputte Greg Brown Fred Stetson George S. Daves

NRR/DBL NRR/DBL NRR/DBL NRR/DBL PSE&G Co. PSE&G Co. PSE&G Co. NRR/DBL Washington Public Power Supply System Washington Public Power Supply System Washington Public Power Supply System NRC/WNP-2 Resident NRR/DBL NMPC NMPC Commonwealth Edison Commonwealth Edison NRR/DBL Commonwealth Edison Detroit Edison Detroit Edison NRR/DBL Pennsylvania Power & Light Co. Pennsylvania Power & Light Co. Pennsylvania Power & Light Co. NRR/DBL Detroit Edison - Fermi-2 Detroit Edison - Fermi-2 New York State Public Service Comm. IE/DI/ORPB WNP-2 SWEC Stone & Webster NUS Corp. PSE&G - Hope Creek

ENCLOSURE 2

PROPOSED AGENDA

8:00 a.m.	INTRODUCTION
	 Elinor G. Adensam, BWR, PD #3 Robert M. Bernero, Director, DBL
8:30 a.m.	NRC/UTILITY LIVING SCHEDULES
	 Tracking System in use by NRC (Pournia) Systems used by Utilities (Coddington/PP&L, Wooley/Detroit Edison) Benefits of a Utility/NRC Integrated Living Schedule (Adensam)
9:30 a.m.	UTILITY PERFORMANCE
	- How do Utilities track their own performance (Powell/WPPSS)
9:45 a.m.	COFFEE BREAK
10:00 a.m.	LEGAL CONSIDERATIONS
	 Sholly Process/NSHC (Scinto) Exemptions and the new Rule (Cameron) Emergency TS changes (Campagnone/Scinto) Interpretation of 10 CFR 50.59 (Scinto)
12:00	LUNCH
1:30 p.m.	TECHNICAL SPECIFICATION IMPROVEMENTS
	 Introduction/Background (Butcher) NRC's role (Butcher) Utility Participation (Sgarro/PP&L)
2:45 p.m.	COFFEE BREAK
3:90 p.m.	SEVERE ACCIDENT POLICY/DEGRADED CORE PROGRAMS
	- Presentation/Discussion (Bernero)
3:08 p.m.	What is DISCRETIONARY ENFORCEMENT
	- Presentation (Vollmer)
4:00 p.m.	OPEN DISCUSSION
4:30 p.m.	Closing Remarks (Adensam - Bernero)
5:00 p.m.	Close

8:00 A.M. INTRODUCTION

ELINOR G. ADENSAM ROBERT M. BERNERO

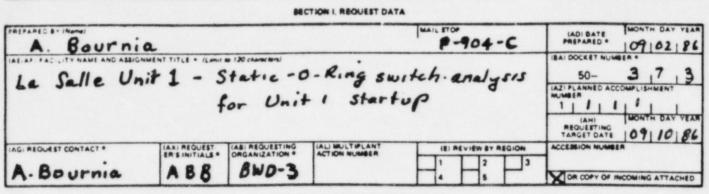
8:30 A.M. NRC/UTILITY LIVING SCHEDULES

ANTHONY BOURNIA (NRC) CORNELIUS CODDINGTON (PP&L) ROBERT WOOLLEY (DETROIT EDISON) ELINOR ADENSAM (NRC)

TRACKING SYSTEM IN USE BY NRC

ORM 187	V.E. NUCLEAR REGULATORY DEMONSTOR	7.
TECHNICA	ASSIGNMENT CONTROL	

OFFICE OF NUCLEAR REACTOR REGULATION



NEW ASSIGNMENT

NEW INFORMATION

SECTION II SYSTEMS CONTROL DATA

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· REQUIRED ENTRIES		111		11

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ional Resource Determinat		CIRCLE ONE
3. Will the review benefit the site?	t from regional proximity to	YES / (NO)
	/or B is "yes", explain why ng sent to the Regions.	
SEQUENCE	NAME	DATE
Project Manager	A. Bournia	
Project Director	E. Adensam	
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	W. Hodges	
Review Branch Chief	Construction of the second designed on the second designed on the second designed and the second desig	Along an West games of games of a game of a distance
Review Branch Chief Regional Div. Director/A Director-BWR Licensing	G. Lainas	
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Regional Div. Director/A Director-BWR Licensing This action is acce This action is acce in lieu of completi Return to Review Branch	epted for completion with a target epted for completion with a target ing TAC# in this fiscal y Chief for assignment of reviewer (RAMS	date of

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ACTION M42536	B-60	ALLE 1 - 08/20/80	G	N/A	QUA 1	BHD3	ATION OF S BOURNIA	SAFETY R	ELATED	ELECTRICAL	EQUIPMENT	(80-CLI-21) 11/30/85	09/15/86		01
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ACTION M49460	ITEM: LA	SALLE 1 -	INSI	RUMENTS N/A	3	BHDS	TION ON IN BOURNIA HUANG	NADEQUAT	E CORE	COOLING (I	I.F.2)		06/18/87		
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ACTION M51102	ITEM: LAS	ALLE 1 -	INSTR	UMENTATI	ON T	O FOL	OH THE CO	DURSE OF	AN ACC	IDENT (RO	1.97)				
	- 17			~~			ROSA BOURNIA	03	31/85			01/10/86	01/24/87		•1
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ACTION M51172	ITEM: LAS	ALLE 1 - 04/04/83	I.D.1 0	.1 - DET	3	HFIB PAEI BHEI	FROELICM ECKENRODE RAMIREZ		REVIEN	PROGRAM PL	AN F-08	07/11/85X 07/07/83P 07/04/86X	18/10/86		02
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ACTION M52850	ITEM: LAS B-77	ALLE 1 - 11/01/83	ITEM 0	2.1 - EQU	3 1	BHD3	ASSIFICAT BOURNIA LASHER	ION AND	VENDOR	INTERFACE 11/25/830	- RTS COMP	DNENTS	04/10/87		02
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	M618892	07/09/86	1111	08/15/86		ACTIVE		<u> </u>	LA SALLE 2 - REPORTING REQUIREMENTS FOR PRIMARY COOLANT HIG REACTIVITY
,	M61890	07/09/86	1111	08/15/86		ACTIVE			LA SALLE 2 - CABLE SEPARATION CONCERNS
,	M61906	07/10/86	1111	08/15/86		ACTIVE		<u> </u>	LA SALLE 1 - REVIEW OF BULK-TO-LOCAL POOL TEMPERATURE DIFFERENCE
	M62093	08/07/86	1111			ACTIVE		<u> </u>	LA SALLE 1 - REVIEW OF LICENSE REVISION TO PCP
,	M62094	08/07/86	1111			ACTIVE			LA SALLE 2 - REVIEW OF LICENSE REVISION TO PCP
	M62095	08/07/86	1111			ACTIVE	<u> </u>	<u> </u>	LA SALLE 1 - REVIEW OF LICENSE REVISIION TO ODCM
	M62096	08/07/86	1111			ACTIVE	<u> </u>		LA SALLE 2 - REVIEN OF LICENSE REVISION TO ODCM
	M62136a	08/13/86	1163			ACTIVE		<u> </u>	LA SALLE 1 - ASSISTANCE TO R-III FOR REVIEW OF TYPE "A" TES VALVE LINEUP (TIA 86-418)
	05000373		1125						LASALLE 1 PROJECT MANAGER ADMINISTRATION
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			174						CORRESPONDENCE AND F.O.I.A.
			181						SUPERVISION AND MANAGEMENT
-			19						ABSENCE (EXCLUDING LHOP)
-			185						TRAINING AND PROFESSIONAL MEETINGS

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•	R-1208775 REGULATO ONRR STAFF INPUT REPORT	RY INFORMATION TRACKING SYSTEM OFFICE: NRR DIVISION: DBL A/D:	PAGE 88 WEEK ENDING 09/06/8
•	EMPLOYEE - (ABB) - A BOURNIA TACS © RPT NO DOCKTO DATE OF TARGET ESTIMATE PROJ © REQUESI PA © DATE DATE	BRANCH: BHD3 SECTION: STATUS/ HOURS COMPL. NON ESTM DATE REG REG M/HR	RUN DATE 08/29/8
	I CERTIFY THAT, TO THE BEST OF MY KNOHLEDGE, EMPLOYEE'S SIGNATURE & DATE: IMMEDIATE SUPERVISOR'S SIGNATURE & DATE:	THE TIME ALLOCATIONS REPORTED ON THIS FORM ARE ACCURATE.	

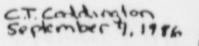
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SUSQUEHANNA COMMITMENT TRACKING AND

SCHEDULING

LICENSING COMPLIANCE LIST
 NUCLEAR DEPARTMENT FIVE YEAR PLAN
 YEARLY MAJOR CAPITAL WORK PROJECTS PLAN



NUCLEAR DEPARTMENT FIVE YEAR PLAN

C PURPOSE - IDENTIFY MAJOR WORK PROJECTS

- FORECAST OUTAGE WORK PROJECTS
- ESTABLISH PROJECT OBJECTIVES (MILESTONES)
- PROVIDE A BASELINE FOR LONG TERM PLANNING
- FORECAST REQUIREMENTS FOR FINANCIAL RESOURCES
- O PROJECT CATEGORY REACTOR SAFETY
 - PERSONNEL SAFETY
 - REGULATORY
 - PLANT BETTERMENT
 - ALARA
 - OTHER

O PROVIDES MANAGEMENT LEVEL SCHEDULE

ALLE + LET MELETIT - di S

LICENSING COMPLIANCE LIST

F. JA

O OBJECT - PROVIDE A CONCISE METHOD TO ENSURE THAT OPEN REGULATORY ITEMS ARE CLOSED OUT

- O COMPUTER LISTING
- o LISTING CONSISTS OF:

LER'S AND SPECIAL REPORTS NRC INSPECTION REPORT ITEMS LICENSE CONDITIONS MISC. LETTERS FROM NRC REQUIRED NRC REPORTS SAFETY EVALUATION REPORT OPEN ITEMS TECHNICAL SPECIFICATION CHANGE REQUESTS

O UPDATED AND ISSUED MONTHLY

YEARLY MAJOR CAPITAL WORK PROJECTS PLAN

1.

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O PROVIDES LISTING OF ITEMS WHICH HAVE BEEN APPROVED FOR WORK DURING THE YEAR

O PROVIDES DETAIL SCHEDULES OF ACTIVITIES

NUCLES LEFT ALEINANTS:

35K5]	TAR	TEAR	PLAN
PROPOSED	987	MAJOR	FROJECTS

Tatle	Unis	ACEIVILY	Priority
1986 Project Carryovers			
1. Turbine-Generator Rotor Replacement	2	RAI	76
2. ATWS	1/2	EAI	66
3. Loss of AC Instrument Indication	1/2	BAI	54
4. Radwaste Solidification Evaluation	C	E	54
5. Dryvell Cooling Modifications	1	I	50
6. Spare Single Phase Transformer	2	E6I	48
7. Control Room Design Review	1/2	I	46
8. Fasdwater LLRT Mods	1	24I	46
9. Appendix "E" Moda	1	EAI	44
10. Turbine-Generator Maintenance Items	1	I	38
11. Radwaste Phase "C"	C	I	36
12. Electric Power Interruption Mode	1/2	EGI	36
13. Muisance Alerne	1/2	E4I	36
14. SPING Enhancements	1/2	I	36
15. Cross Around Piping Painting	1	I	34
16. Spare Penetrations	1/2	EGI	30
17. ECCS & RCIC Keep Fill Modification	1	Ł	28
18. MCU Charging Water Check Valve Leakage	1	8	26
19. ESW Butterfly Valve Changaout	C	x	22
20. Hydrogen Water Chamistry	1/2	E4I	20
21. Access Improvements	1/2	E4I	18
22. Simulator Enhancements	C	E4I	18
23. Cowanesque Reservoir Modification	C	I	¥/A
New Projects:			
1. MSIV Valve Modification (Study)	1/2		42
2. Faedwater Heater Cocldown Line	1/2	Z	38
3. PASS System Upgrade	1/2	R	38
. SRV Position Indication Redundancy	1/2	E	36
5. Condenser Waterbox Vent Valve Mode	1/2	E	36
5. Diesel Generator Reliability Enhancements (Study)	c	E	36
7. Dryvell Cooling Isolation Valve Power Supplies	2	I	36
5. Compressed Air Systems Cooling Supply	1/2	E4I	35
9. Fire Protection Modifications	1	I	34
10. Excore WHE Amplifier Relocation/Logic Mod	2	I	32
11. Circ Water Chemical Treatment System	1	1	30
12. Condensate Demin URC Flow Rate Mod	2	86I	28
13. ESW Piping Changeout (Seal Water Coelers)	1/2	1	28
4. Feedwater Sample Probe Changeout	1	1	28
5. REE Shutdown Cooling Valve Operability	1	1	28
6. Turbine Bldg. LP Eanger Mods	1	1	25
7. Turbine Bldg. SP Hanger Mods	2	RAI	25
16. Dryer/Separator Fool Water Seal	1/2	EAT	22
19. Auxiliary Boiler Reliability Enhancements (Study)	c	8	18
20. Recirc Fump Upper Cavity Vent Velve	1	E	18
11. Fault Racorders		-	11

TOTAL PROJECTS - 44

F.J.

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-	MIT & and TECH SPEC CHANNE	EC CHANNE #	STREETS		A A A C A
BUTHOR TS	E	P-1ST MP		LICENSIDIR. THESE CHUNDES ME REQUIRED IN SUPPORT OF THE MALT 2 251 Refueling and increention outage.	
	HAR/JOH	HARVER T-45/23/96 COPLER	STIPPLE IE	SURVER RELOAD PACKAGE TO LACENGING. (LLICENSING TO SUBMET BY 4/9/26)	
		R-15T REF CLOSE	CLOSE	REVISE THE OMERCIANNENT PAGITECTION AND ASSOCIATED TESTING REQUINENDING FOR 4487 combuctors indended in contained in Primation Assemblies (NCP 45-621) Required Pation to Startup Following the (NET 2 FIRST Reflecting and	E X 1
	Ħ	T-10/10/95	COPPLETE	SUBICIT PROPOSED AND/OPENT TO NEC. SEE PLA-PEAA. BARANCED AND/OSED AND/OPENT	
	¥	T-12/34/85 COPLETE	COMPLETE	NOTICE PROPOSED APPROPRIAT IN FEDERAL INCOMENTS	
		T-ON/BLAN	COMPLETE	ISSUE LICENSE ANENDNENT BYA.	
11-61		FIDE	X-REF	SEE LAGT 1 TECH SPEC CHANGE \$112	4.8
		1-104	X-MEF	SEE UNCT 1 TECH SPEC CHANGE #115.	**
111-11		N-157 MEF OPEN		ALLOW ISOLATION OF ZONE I OR ZONE II FROM ZONE III IN COMBITION «, Desired Prior to Sautrodan for unit 7 1st reflet a inspection outrage.	K X 1
		#E/JOB 1-82/12/86 COPPLETE	TTA NAMO	COMPLETE CALDIA.ATTOMS SUPPORTING SAFETY DIPACT ASSESSMENT.	
	2	T-96/1796 COPLETE	THE PARTY	OBTAIN PORC APPROVAL	
	E E	1-05/12/06	COMPLETE	OBTAIN SAC APPROVAL	
	5	MANELAR-1	3137460D	SIGNUT PROPOSED ANENDARDAT TO MAK. SEE PLA-2445, PROPOSED ANENDARDAT 857 (LAUT 2) AND 34 (LAUT 1).	
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MAJOR CAPITAL PROJECTS

CATEGORY

TITLE

Reactor Safety.

Powerplex Unit 1 Drywell Cooling-Isol. Viv Pwr. Supplies

Personnel Safety:

Regulatory:

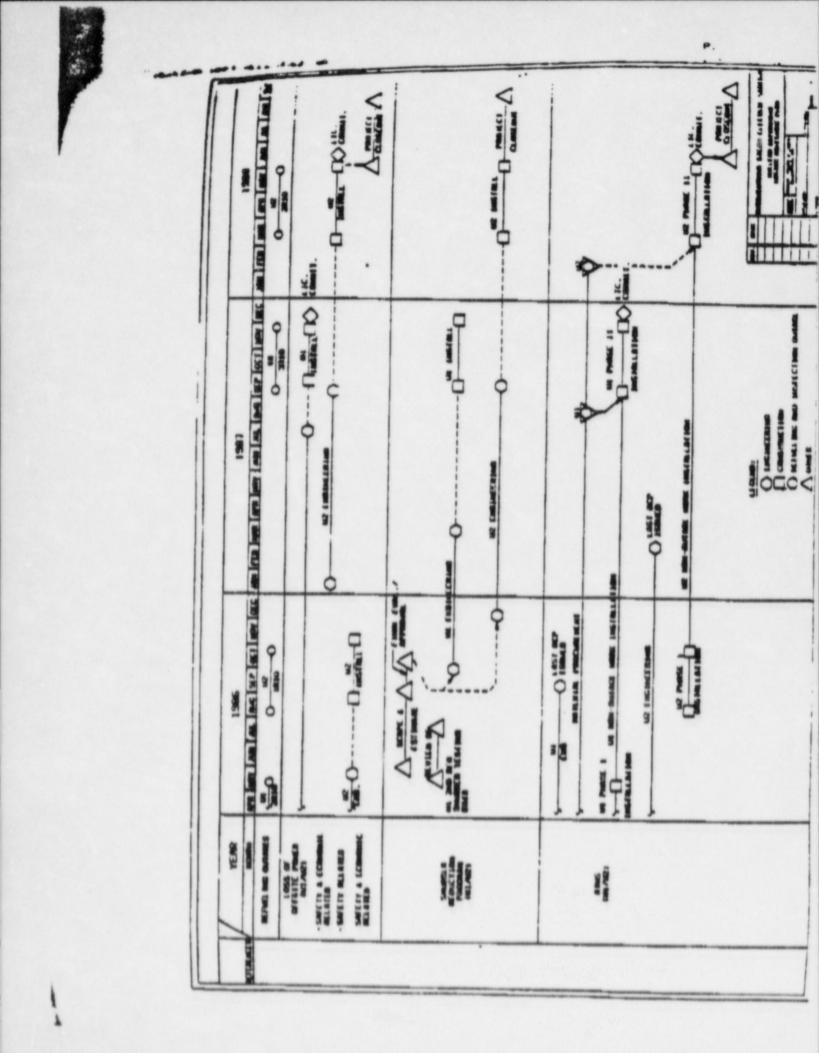
ATW: Unit 1/2 Con:rol Room Design Review Unit 1/2 Witrogen Makeup Valves Unit 1 NMR Throttling Valves Unit 1/2 SYDS Enhancements Unit 1/2 Fire Frotection Mode. Unit 1/2 Loss of AC Instr. Indication Unit 1/2 Appendix "R" Mode Unit 1/2 ESW Piping Changeout Motor Oil Coolers Unit 1/2 PASS System Upgrade Unit 1/2 Cowanescue Reservoir Mod. Unit C Hasardous Waste Facility Unit C Sewage Treatment Flant Unit C

Plant Batterment:

Alternate EPCI Room Cooling Unit 1 Degraded Grid Voltage Unit 1/2 Drywell Cooling Mode Unit 1/2 o Phase II Unit 1/2 Feedwater LLRT Mode Unit 1/2 Turbine Generator Maint Itame Unit 1/2 Turbine Generator Motor Replacement Unit 1/2 Access Improvements Unit 1/2 ECCS & ECIC Ecepfill Mod Unit 1/2 Electric Fower Interruption Mode Unit 1/2 Electric Fower Interruption Mode Unit 1/2 HCU Charging Water Check Viv. Leakage Unit 1/2 Hydrogen Water Chemistry Unit 1/2 SPING Enhancements Unit 1/2 Circ. Water Chemical Treatment System Unit 1/2 Compressed Air Systems Cooling Supply Unit 1/2

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COMMITMENT TRACKING AND SCHEDULING AT FERMI 2

- * REGULATORY ACTION AND COMMITMENT TRACKING SYSTEM (RACTS)
- * FERMI 2 INTEGRATED MASTER PLAN

R. L. WOOLLEY SEPTEMBER 9, 1986

OBJECTIVES

RACTS HAS TWO PRIMARY OBJECTIVES

- ENSURE REGULATORY ACTION ITEMS AND COMMITMENTS ARE SATISFIED
- ONCE SATISFIED, ACTION ITEMS AND COMMITMENTS REMAIN SATISFIED

Γ

PPOCESS

- ACTION ITEMS AND COMMITMENTS IN INCOMING AND OUTGOING CORRESPONDENCE IDENTIFIED
- * ITEMS ENTERED IN COMPUTERIZED DATABASE AND ASSIGNED
- * PESPONSE VERIFIED BY OA PRIOR TO CLOSURE

CONTINUING COMPLIANCE

- CROSS REFERENCE REPORT DISTRIBUTED ON A MONTHLY BASIS
- REPORT LISTS ALL IMPLEMENTING DOCUMENTS ALPHA NUMERICALLY AND CROSS REFERENCES THEM TO THE SEQUENCE NUMBER OF THE COMMITMENTS WHICH THEY IMPLEMENT

INTEGRATED MASTER PLAN

- PROJECT ? BASED
- * RECENT FERMI ? TOOL
- USED FOR 08/04/86 RESTART
- · DEVELOPING 18 MONTH LOOK AHEAD
- DATED RACTS COMMITMENTS ARE SEMI-AUTOMATICALLY INCLUDED
- · WFEKLY REVIEW

"LIVING" SCHEDULES

- OBJECTIVES
- ADMINISTRATIVE IMPACT
- PROCEDURE
- ° GAINS

ELINOR G. ADENSAM SEPTEMBER 9, 1986

OBJECTIVES

- * FOCUS ON REAL SAFETY ISSUES
- COORDINATION OF EFFORTS
 - LICENSEE
 - REGION
 - NPP
- * PROPER ALLOCATION OF RESOURCES

ADMINISTRATIVE IMPACT

- NOTICE GENERATION
- NOTICE PERIOD
- ° STAFF RESOURCES

PROCEDIIRE

- DEVELOP LIST & PRIORITIES
 - LICENSEE
 - REGION (RESIDENT)
 - NRR (PM)
- MEET TO DISCUSS & AGREE ON PRIORITIES
- PROPOSE COMPROMISES WHEPE PRIORITIES NOT AGREED UPON
- USE MEETINGS TO DISCUSS OTHER LICENSING ACTIVITIES
- SCHEDULE PERIODIC UPDATE MEETINGS TO ADJUST SCHEDULES/ PRIORITIES AS NECESSARY

GAINS

- STAFF/LICENSEE EFFORTS ARE FOCUSSED ON SAFETY FIRST
- SOME DEGREE OF ASSURANCE OF AVAILABLE STAFF RESOURCES
- * PEDUCED POTENTIAL FOR "EMERGENCIES"
- * LICENSEE KNOWS A "NICE-TO-HAVE" MAY BE DELAYED
- * LICENSEES HAVE A FORUM TO JUSTIFY THEIR REQUESTS & PRIORITIES
- STAFF CAN ANTICIPATE THEIP WORKLOAD

9:30 A.M. UTILITY PERFORMANCE

G. C. SORENSEN (WPPSS)

PERFORMANCE INDICATOR REPOPT OPERATIONAL AREAS

> OPERATIONS MAINTENANCE TECHNICAL HP/CHEMISTRY ADMINISTRATION TRAINING OUALITY ASSURANCE SUPPORT SERVICES MATERIAL MANAGEMENT

> > G. C. SORENSEN SEPTEMBER 9, 1986

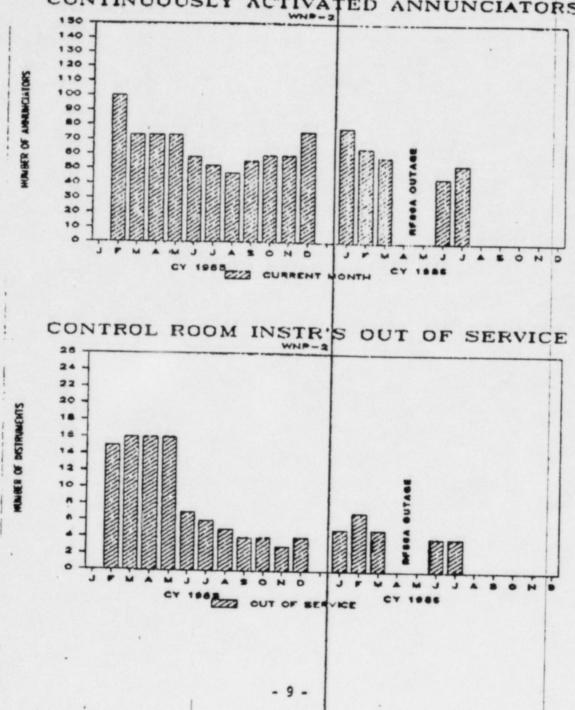
CONTROL ROCM INSTRUMENT OPERABILITY

(THU)08.128.'86 12:56

This first graph below depicts the number of control room annunciators activated during plant operation while at power for a duration exceeding 24 consecutive hours. The second graph depicts the number of control room instruments that are not performing their design function, regardless of the reason. This includes instruments on control room back panels.

FROM 372 5328

:2



CONTINUOUSLY ACTIVATED ANNUNCIATORS

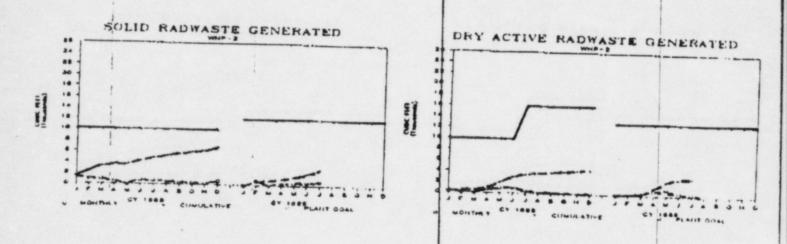
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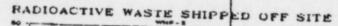
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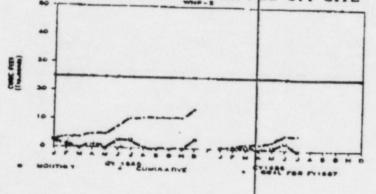
SOLID RADWASTE

Solid radwaste includes two products: (1) solidified radioactive waste which is the accumulation of radioactive products (sludge, resins, filter cake) removed by liquid and gaseous processing systems; and (2) contaminated solid ance activities. These graphs depict the monthly and cumulative cubic feet of solidified radioactive waste and dry active waste generated at WNP-2 and

For FY 87, WNP-2's goal is to limit the volume of solid radwaste shipped from the plant to 25,000 cubic feet.







This Month:

Total radioactive waste (i.e., solidified and dry active) generated during July was 959 dubic feet.

- 19 -

QUALITY PROGRAM TREND REPORT

NONCONFORMANCE REPORTS (NCRs) PLANT DEFICIENCY REPORTS (PDRs) OUALITY SURVEILLANCE REPORTS AUDIT REPORTS NRC CITATIONS LICENSEE EVENT REPORTS (LERs) TECHNICAL SPECIFICATIONS VIOLATIONS *

No:

(2)

(3

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WNP-2 TREND ANALYSIS REPORT FOR THE FIRST QUARTER OF 1986

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The results of this analysis are:

	ITE NO.		EVENT 2085	FREQUENCY 3085	BY 4085	QUARTER 1086
	1	Level switch set point drift	4	5	4	. 4
	2	Valve leaks	24	7	4	8 (1)
	3	Valve functional failure	11	6	3	7 (2)
	4	Security not notified of employee termination.	4	2	3	3
	5	Calibration control problems	0	2	1	7 (3)
	6	Misc. problems with records	24	14	13	12 (4)
	7	Items incorrectly stored	0	1	1	4
	8	Tech Spec surveil not per- formed in time	4	7	3	4
te	<u>s</u> :					
)	Fiye (5) of these were containment iso	lation valu	e tests		
)	Three (3) of these were MSLC				
)	Six (6)	of these were one surveillance				
)	Not con	sidered excessive				

Each of the items listed above was analyzed for safety significance by applying the following significance factors:

		Significant Test Criteria	Significance Factor (Multiplier)
	a.	Frequency in current quarter greater than the	1.20
1	b.	average frequency for the previous three quarters Frequency in current quarter greater than twice	1.50
-		the average frequency for the previous three quarters	
	ċ.	Event resulted in a reactor scram	1.50
(d.	Event involved a challenge to a safety system	1.50
	e.	Event was reportable to the NRC in more than 4 hours	1.50
	f.	Event was reportable to the NRC within 4 hours	1.65
	9.	Event was reportable to the NRC within 1 hour	1.80

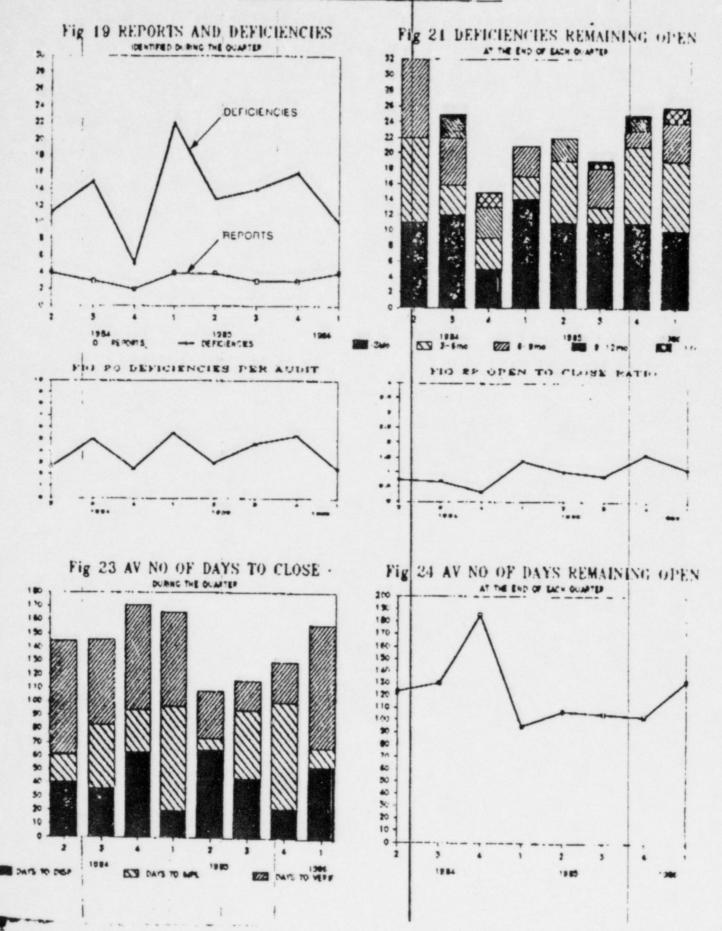


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PAGE

NO. 6

AUDIT DEFICIENCIES



11

10:00 A.M. LEGAL CONSIDERATIONS

J. SCINTO (NRC)

C. CAMERON (NRC.)

M. CAMPAGNONE (NRC)

SPECIFIC EXEMPTION (10 CFR 50,12)

- MUST BE AUTHORIZED BY LAW; NO UNDIE PISK TO PUBLIC HEALTH
 & SAFETY; CONSISTENT WITH COMMON DEFENSE AND SECURITY
- SPECIAL CIRCUMSTANCES MUST BE PRESENT:
 - CONFLICTS WITH OTHER RULES
 - UNDERLYING PURPOSE NOT SERVED
 - HARDSHIP
 - BENEFIT TO PUBLIC HEALTH AND SAFETY
 - TEMPORARY RELIEF & GOOD FAITH EFFORT
 - MATERIAL CIRCUMSTANCES NOT PREVIOUSLY CONSIDERED

§50.12 SPECIFIC EXEMPTIONS

- (a) The Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of this part, which are -
 - Authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security.
 - (2) The Commission will not consider granting an exemption unless special circumstances are present. Special circumstances are present whenever -
 - Application of the regulation in the particular circumstances conflicts with other rules or requirements of the Commission; or
 - (ii) Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule; or
 - (iii) Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated; or
 - (iv) The exemption would result in benefit to the public health and safety that compensates for any decrease in safety that may result from the grant of the exemption; or
 - (v) The exemption would provide only temporary relief from the applicable regulation and the licensee or applicant has made good faith efforts to comply with the regulation; or
 - (vi) There is present any other material circumstance not considered when the regulation was adopted for which it would be in the public interest to grant an exemption. If such condition is relied on exclusively for satisfying paragraph (a)(2) of this section, the exemption may not be granted until the Executive Director for Operations has consulted with the Commission.

- · OPERATING PROCEDURES FOR EMERGENCY LICENCE AUTHORIZATION
- APPLICABILITY
 - PLANT SHUTDOWN
 - DERATE
 - EXTENDED OUTAGE
 - TIME NOT AVAILABLE TO NOTICE (15 DAYS)
- AUTHORIZATION
 - DIVISION DIRECTOR
 - AUTHORITY MAY NOT BE DELEGATED TO ANY ORGANIZATIONAL LEVELS BELOW DIVISION DIRECTOR

MARI-JOSETTE CAMPAGNONE SEPTEMBER 9, 1986

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LICENSEE PROCEDURE

When the <u>licensee</u> determines that the time required to restore components or systems to an operable condition is greater that the period specified in Technical Specification Limiting Conditions of Operation or when a Technical Specification Surveillance Requirement otherwise cannot be satisfied, a formal submittal shall be made to the NRC. This submittal shall contain:

- A safety evaluation with a no significant hazards consideration determination;
- (2) Revised Technical Specification pages;
- (3) A discussion of proposed interim compensatory measures to be imposed;
- (4) A discussion of circumstances surrounding the situation, and a determination of why the need for prompt action could not have been avoided;
- (5) The scheduled date for returning inoperable components or systems to an operable condition, or the scheduled date for accomplishing required surveillance;
- (6) A statement that a best effort has been made to notify State personnel; and
- (7) Information for the NRC to prepare an environmental assessment or the basis for NRC to determine that the amendment involves a categorical exclusing under 10 CFR Part 51.

This submittal shall be made promptly to the Director, Office of Nuclear Reactor Regulation, with copies to the Regional Administrator, Office of Inspection and Enforcement, and to the Resident Inspector. The purpose of prompt reporting is to allow the NRC to review the circumstances of the request for an expedited NRC review and to render a timely decision on whether to authorize continued reactor operations or reactor startup. The prompt submittal shall be made in all cases where NRC action in less than 15 days.

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PM PROCEDURE

- The <u>PM</u> shall determine that a complete submittal has been received. If a complete submittal has not been provided, the <u>PM</u>, with <u>Project Director</u> concurrence, shall advise the licensee of the pending denial or, given sufficient time, request a resubmittal or additional information.
- ^c The <u>PM</u> shall review the conclusion that plant shutdown, derate, or extended plant outage will result. If a plant shutdown, derate, or extended outage will not result, the normal procedures for TS changes shall be followed and the <u>PM</u>, with the Project Director concurrence, shall advise the licensee that such action is being taken.
- ^c The <u>PM</u> shall prepare and sign a handwritten safety evaluation (SE) (The handwritten safety evaluation must include the NRC basis for a final no significant hazards consideration determination and a statement supporting the need for an emergency license authorization in light of the circumstances causing the licensee's request. This supporting documentation must state why the requested expedited action could not have been avoided, what appropriate compensatory measures will be taken, when the authorization expires, and that the State has been consulted and what, if any, comments were made by the state.), environmental assessment (EA) if applicable, and final no significant hazards consideration. Technical Specification pages shall accompany the SE, and, if appropriate, handwritten changes to the pages as submitted by the licensee shall be made.

In performing the review and preparing the documentation the <u>PM</u> shall: (1) obtain handwritten SER input from the ORAB and/or the cognizant DBL review branches, if appropriate, (2) consult with the resident inspector and/or appropriate regional personnel, and (3) request that all participating parties attempt to obtain their respective management's concurrence for input provided.

- The PM make a "best effort" via telephone to advise the state of the pending NRC action and to obtain state comments on the proposed NRC determination. The SE shall discuss this consultation and any state comments. The PM shall document the final no significant hazards finding (10 CRR 50.92) in the SE along with the environmental impact findings and conclusions. Finally, the PM shall complete and sign the emergency license authorization check off list. (See Attached)
- After completion of the SE, the <u>PM</u> shall obtain the concurrence of his Project Director and the cognizant Division Director. If the cognizant Division Director is not available concurrence may be obtained from one of the other NRR Division Directors. If no DDS are available, concurrence shall be referred to higher management. (Concurrences may be obtained verbally during non-duty hours) After obtaining the necessary concurrences, the <u>PM</u> shall contact the Region Branch Chief and the resident inspector and advise of the outcome.

The DD shall then contact the facility's licensing management or plant manager and verbally communicate the emergency license authorization. the <u>PM</u> shall ensure that the necessary information to characterize accurately the full extent and conditions of the licensee's request and the NRC authorization, is documented and understood by the licensee at the time of verbal authorization. This includes a handwritten SER/EA, a final NSHC, and the licensee's submittal including affected Technical Specification pages. (If concurrence is not obtained, the DD shall orally advise the licensee of the pending denial and, if time allows specify the criteria which must be satisfied in order to receive NRC authorizaton.) If approval is granted, the <u>PM</u> shall telecopy revised Technical Specification pages to the licensee and to the resident inspector.

Within two working days from DD oral authorization the <u>PM</u> shall insure that a follow-up license amendment, including a NSHC and post notice, is forwarded which provides the bases for NRC approval. The <u>PM</u> shall ensure that documentation is forwarded to the LPDR.

Enclosure 1

EMERGENCY LICENSE AUTHORIZATION

CHECK LIST

1.	Complete submittal (Section III, Item 1)	
2.	Prepare and sign handwritten SER, EA, final NSHC and Technical Specifications (Section III, Item 5)	
	a. ORAB or technical branch input b. Resident or regional personnel input	
3.	"Best effort" to obtain state comments (Section III, Item 6)	
4.	Assistant Director concurrence (Section III, Item 7)	
5.	Assistant Director oral authorization to licensee (Section III, Item 8)	
6.	Telecopy Technical Specifications (Section III, Item 8)	\Box
7.	Forward final two day license amendment with post notice and FNSHC (Section III, Item 9) (Prepare DLOP 228, Attachment 4)	
Proj	ect Hanager	
	ch Chief	
ORAB	Branch Chief / Tech. Review Branch Chief*	
ORAB		
•.	To the extent practicable.	

1

1:30 P.M. TECHNICAL SPECIFICATION IMPROVEMENTS

E. BUTCHER (NRC)

R. SGARRO (PP&L)

NRR TECHNICAL SPECIFICATIONS IMPROVEMENT PROGRAM

PHASE I

Problem Identification and Recommendations, TSIP Report

PHASE II

Implementation, TSCB

TECHNICAL SPECIFICATIONS COORDINATION BRANCH (TSCB)

FUNCTIONS

- Implementation of TSIP Recommendations
- General Oversight of All NRR Technical Specifications Activities
- Generic(i.e., Non-Vendor Specific) Interpretations
- ORGANIZATION PROJECT TEAMS
 - W Tom Dunning/Dave Langford
 - GE Kulin Desai
 - CE Sam Bryan/Millard Wohl
 - B&W Sam Bryan/Millard Wohl

NRC TECHNICAL SPECIFICATIONS

IMPROVEMENT PROGRAM PLAN OUTLINE

- 1.0 INTRODUCTION (PROGRAM OBJECTIVES)
 - POLICY STATEMENT ON TS SELECTION CRITERIA AND NEW STS.
 - SHORT TERM IMPROVEMENTS TO EXISTING STS.
- 2.0 DEVELOPMENT OF NEW STS (BASED ON POLICY STATEMENT).
- 3.0 SHORT TERM IMPROVEMENTS TO EXISTING STS.
- 4.0 OTHER STS IMPROVEMENT ACTIVITIES.
- 5.0 COORDINATION AND POLICY STATEMENT SCHEDULE.

EXECUTIVE SUMMARY NRC TECHNICAL SPECIFICATIONS IMPROVEMENT PROGRAM PLAN

MARCH 28, 1986

Prepared by: Technical Specifications Coordination Branch Division of Human Factors Technology, NRR

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TABLE OF CONTENTS EXECUTIVE SUMMARY TECHNICAL SPECIFICATIONS IMPROVEMENT PROGRAM PLAN

2.0 DEVELOPMENT OF NEW STS 2 2.1 Trial Use of AIF and TSIP Criteria...... 2 2.3 Improvements to TS Text and Bases Sections...... 4 2.4 Industry Preparation/Submittal of New STS...... 4 2.5 NRC Review/Approval of New STS...... 4 2.6 Plant Specific Implementation of New STS...... 4 3.0 SHORT TERM IMPROVEMENTS TO EXISTING STS..... 3.1 Short Term STS Improvements to be Developed by TSCB..... 5 3.2 Short Term STS Improvements to be Developed by the NRR Licensing Divisions...... 5 4.0 OTHER STS IMPROVEMENT ACTIVITIES..... 6 4.1 Improvements to Sections 5.0 and 6.0 of STS...... 6 4.3 Surveillance Requirements...... 7 4.4 PRA Methods for STS Improvements...... 7 4.5 Controls for Requirements Transferred from the Control of the TS..... 7 APPENDIX A - Issues Raised in the Commission's Staff Requirements Memorandum dated February 21, 1986.... A-1

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TECHNICAL SPECIFICATIONS IMPROVEMENT PROGRAM PLAN

1.0 INTRODUCTION

In the past several years the nuclear industry and the NRC staff have been studying the question of whether improvement to the current system of establishing Technical Specification (TS) requirements for nuclear power plants is needed. The two most recent studies of this issue were performed by an NRC task group known as the Technical Specifications Improvement Project (TSIP) and a Subcommittee of the Atomic Industrial Forum's Committee on Reactor Licensing and Safety. The overall conclusion of these studies was that many improvements in the scope and content of Technical Specifications are needed, and that a joint NRC and Industry program should be initiated to implement these improvements. Both of these groups made specific recommendations which are summarized as follows:

- 1) The NRC should adopt the criteria for defining the scope of TS proposed in the AIF and TSIP reports. Those criteria should then be used by the NRC and each of the Industry Owners Groups to completely rewrite/streamline the existing Standard Technical Specifications (STS). This process would result in many requirements being transferred from control by Technical Specifications to control by other mechanisms (e.g., the FSAR, Operating Procedures, QA Plan) which would not require a license amendment or prior NRC approval when changes are needed. The new STS would also include greater emphasis on human factors principles to add clarity and understanding to the overall text and Bases Section.
- A parallel program of short term improvements in both the scope and substance of the existing TS should be initiated in addition to developing a new set of STS as identified in 1) above.

The purpose of this Executive Summary of the Program Plan is to outline the specific set of activities to be performed by the industry and the NRC aimed at the practical implementation of these recommendations.

This document is structured so as to link specific activities under the program with the two major objectives embodied in the TSIP and AIF recommendations summarized above. As such, Section 2.0 below is devoted to the development of a new set of STS while Section 3.0 is devoted to implementing shorter term improvements to the existing STS. Section 4.0 describes other general activities necessary to support the overall program. And finally, Section 5.0 summarizes the schedule of activities for the issuance of the Commission Policy Statement on Technical Specifications.

¹"Recommendations for Improving Technical Specifications," NRC Technical Specification Improvement Project, September 30, 1985. "Technical Specification Improvements," AIF Subcommittee on Technical Specifications Improvements, October 1, 1985.

2.0 DEVELOPMENT OF NEW STS

The first priority of this Program Plan shall be the development of a Commission Policy Statement to establish a specific set of objective criteria for determining which regulatory requirements and operating restrictions should be included in TS.

2.1 Trial Use of AIF and TSIP Criteria

Before the staff can recommend that the Commission issue a Policy Statement based on the TSIP and AIF criteria, these criteria must be validated (i.e., shown to be technically adequate and practical to implement). The validation process will be through a trial use of the criteria on actual operating reactor TS.

Activities

Schedule Goals

Completed - 02/18/86

- AIF and NRC separately applied the criteria to Wolf Creek and Limerick TS. Limiting Conditions for Operation and associated Surveillance Requirements, were evaluated against the criteria.
- AIF and NRC met to discuss the results of the trial application of the criteria. Areas of agreement and disagreement were discussed and differences resolved where possible. Remaining defects in the criteria or changes needed to improve clarity were summarized.
- 3. NRC RRAB will perform an evaluation of the risk significance of the systems or components with LCOs that would be removed from the TS and currently require a power reduction or shutdown. If the criteria result in LCO's with major risk significance being removed from the TS, then changes to the criteria will be proposed.
- 4. The results of 2 and 3 above will be used for modifying or clarifying the criteria, as needed. The final criteria developed through this process will be included in the Policy Statement discussed in Section 2.2 below.

Meetings Completed Wolf Creek-01/28/86 Limerick-02/26/86 Report Issued-03/21/86

Started-03/10/86 Finish-04/30/86

Start-In Parallel with 2 and 3 above. Finish-04/30/86

2.2 Develop Commission Policy Statement

The second step in developing the new STS is to issue a Policy Statement which defines the scope, purpose, and content for Technical Specifications. The core of this Policy Statement will be the TS selection criteria validated by the process outlined in Section 2.1 above.

Activities

- 1. TSCB, with the support of ELD and other NRC staff will draft a Policy Paper recommending Finish-04/30/86 that a Notice of Proposed Policy Statement be issued for public comment stating the Commission's intent to establish a specific set of objective criteria for determining which regulatory requirements and operating restrictions should be included in TS. The Policy Paper will include a discussion of all the issues listed in Appendix A which were identified in the Commission's Staff Requirements memorandum dated 02/21/86. Withdrawal of the earlier proposed rule change for 10 CFR 50.36 would be included in this Notice.
- 2. The first draft Policy Paper will be circulated for review and comment to each of the NRC Program Offices. Regional Offices and NRR Divisions. After comments from all groups have been considered and appropriate changes made, a second draft will be issued for ACRS review.
- 3. The second draft Policy Paper will be presented to the ACRS. Any changes necessary will be made and a final draft paper prepared and forwarded to CRGR.
- 4. The final draft paper will be presented to CRGR for review and approval. Any required changes will be made and the Policy Paper will be forwarded to the Commission.
- 5. The staff will, at the Commission's option. make a presentation to the Commission on the Notice of Proposed Policy Statement and make changes directed by the Commission prior to publishing the Notice for public comment.

Start-05/01/86 Finish-07/03/86 Second Draft Issued.

Start-07/07/86 Finish-08/01/86 ACRS Review Complete and Policy Paper Forwarded to CRGR.

Start-08/04/86 Finish-08/29/86 CRGR Review Complete and Policy Paper Forwarded to Commission.

Start-09/02/86 Finish-10/17/86 Notice of Proposed Policy Statement Issued.

Schedule Goals

Started-03/24/86 First Draft Issued Public comments received in response to the Notice will be reviewed and addressed in a second Policy Paper for the Commission proposing a final Policy Statement on Technical Specifications Improvement. Following Commission approval the Policy Statement will be issued.

Start-11/13/86 Comments received. Finish-01/30/87 Policy Statement Issued.

2.3 Improvements to TS Text and Bases Sections

In addition to culling out the less important requirements in the existing STS by applying the selection criteria discussed in Sections 2.1 and 2.2 above, a major objective of the TS Improvement Program is to, through the application of human factors principles, add clarity to the TS. These types of changes represent one of the primary safety benefits to be achieved from the program. NRC and Industry activities will include the development of a Standard Format and Content Guide for TS text and Bases. This work will be completed and available for use in preparing the new STS discussed below.

2.4 Industry Preparation/Submittal of New STS

The primary instrument to be used for achieving the desired improvement in TS will be a new set of STS based on selection criteria to be defined in a Commission Policy Statement. It is expected that the Industry, through the individual owners groups, will take the lead in preparing the new STS and submitting them in a Topical Report. The details of this process and a schedule for submittals have not yet been worked out with the Industry, however, the objective is for Industry to develop and issue the new STS and any subsequent revisions. The NRC role would be limited to review and approval.

2.5 NRC Review/Approval of New STS

A schedule goal of six months from the date of submittal has been established for completion of the staff's review. The bases for the staff's review will be the guidelines established in the Commission Policy Statement and the guidance developed under subsection 2.3 above.

2.6 Plant Specific Implementation of New STS

Plant specific implementation of the new STS is not considered a part of the Program Plan. TSCB will, however, in conjunction with Industry, develop guidelines for the contents of the individual licensee amendment submittals necessary to convert to the new STS. A likely requirement for the submittal package will be some document or method to identify how each requirement removed from the TS would be controlled after the license is amended. The effective date of the amendment would be specified to allow time for any required changes in the licensees procedures and administrative controls.

3.0 SHORT TERM IMPROVEMENTS TO EXISTING STS

There is mutual agreement between NRC and Industry that many short term improvements in the current STS should be made in parallel with the longer term plan to develop new STS as discussed in Section 2.0 above. These improvements are needed to resolve recurring problems with certain technical and administrative requirements in operating plant TS. These issues are of minor safety significance, but their resolution requires a considerable amount of NRC staff and Industry resources. The general approach for making these types of changes will be to revise specific requirements in the existing STS, issue a Generic Letter with the revised STS enclosed, and then process individual operating reactor license amendment requests based on the Generic Letter.

In order to expedite the review process so that short term improvements can be implemented as soon as possible, two parallel paths for developing and processing the STS changes have been established. The first path is through TSCB and the second is through the three NRR Licensing Divisions. The types of improvements that would follow each of these paths are discussed in Subsections 3.1 and 3.2 below. Regardless of which path is followed, the actual change to the STS and the Generic Letter implementing it would be prepared by TSCB.

3.1 Short Term STS Improvements to be Developed by TSCB

As a general rule, short term STS improvements which are applicable to all plants without regard to vendor design, e.g., fire protection, general requirements applicable to limiting conditions for operation and surveillance requirements, and administrative control requirements, will be developed by TSCB. These types of changes can be initiated and developed by the staff without significant additional input from the Industry. TSCB will develop the changes, coordinate NRR and CRGR approval (where required), and prepare a Generic Letter for notifying licensees of approved STS changes.

3.2 Short Term STS Improvements to be Developed by the NRR Licensing Divisions

The review and development of vendor specific short term STS improvements will be the responsibility of the applicable NRR Licensing Division. In addition certain other generic (i.e., applicable to more than one vendor design) changes will also be developed by the Licensing Divisions. The types of changes that will be handled by the Licensing Divisions are generally initiated by the Industry and must be reviewed by a technical specialist branch within the NRC. Two types of submittals to the Licensing Divisions have been designated uy the staff for use by the Industry in initiating staff action on these types of short term improvements. The first type is a Topical Report to justify changes to the Allowed Outage Times (AOTs) and Surveillance Intervals (SIs) associated with STS requirements. The second type of submittal which will initiate an NRR Licensing Division review is a plant specific license amendment which has been endorsed by the Industry (e.g., an Owners Group) as a candidate for consideration under the Technical Specifications Improvement Program.

4.0 OTHER STS IMPROVEMENT ACTIVITIES

The main focus of both the NRC and Industry Technical Specification improvement activities discussed above has been on the LCOs in Section 3 of the STS. However, consideration will be given to the need for improvements to the other STS sections, particularly Sections 5.0 and 6.0. AIF recommended rule changes and the relocation of surveillance requirements to other controlled documents will also be considered.

Another area related to STS improvements is the TSIP and AIF recommendations for continued development and application of probabilistic risk assessment (PRA) methods to address TS requirements. And finally, policy guidance for selecting appropriate controls on requirements which will be transferred from the control of the current STS, through the application of the selection criteria discussed in Subsection 2.1, needs to be established. This policy guidance must be established before a new set of STS can be approved by NRC.

4.1 Improvements to Sections 5.0 and 6.0 of STS

The Policy Statement will only establish selection criteria for LCOs. Improvements to the Design Features and Administrative Controls sections will be developed by TSCB and incorporated into the existing STS as short term improvements.

4.2 Rule Changes

AIF recommended that NRC initiate rulemaking to codify the criteria for TS requirements in place of the current requirements of 10 CFR 50.36. In addition, several changes in the regulations referencing Technical Specification were recommended to conform with the new STS requirements (e.g., 50.36 on RETS, Part 50 Appendices I, J, K, H, and R on duplicate or overlap TS requirements). Proposed rule changes will be developed by TSCB with input from the Licensing Divisions. A major rule change to codify the criteria will not be initiated until some experience using the criteria under a Policy Statement has been gained.

4.3 Surveillance Requirements

AIF recommended that surveillance requirements for items listed in the new STS should be relocated to documents not controlled by the license amendment process. Further, it was recommended that the details associated with surveillance, frequency and methodology, may be more effectively controlled by a program with an appropriate administrative control process. TSCB will work with Industry to develop the justification for a change in the process by which surveillance requirements are addressed in TS.

4.4 PRA Methods for STS Improvements

The NRC Office of Research is developing a Procedure for Evaluating Technical Specifications (PETS) which addresses PRA methods to evaluate changes to AOTs and SIs. Guidance on this subject is needed to facilitate Licensee's preparation of changes that are based on risk assessments. TSCB will interface with RES on the results of the PETS program which will be used to provide guidance to Industry and the staff on PRA methods for evaluating changes to Technical Specifications.

4.5 Controls for Requirements Transferred from the Control of the TS

Various mechanisms exist which can be used to control those requirements which would be removed from the TS when the proposed selection criteria are applied. There is a need to establish guidance for determining which controls are appropriate for particular requirements based on their safety significance. TSCB will develop and issue this guidance with input from Industry.

5.0 COORDINATION, AND POLICY STATEMENT SCHEDULE

5.1 Coordination

TSCB will be responsible for managing and coordinating all NRC activities within the scope of the Program Plan and will serve as the point of contact at the NRC for all Industry related activities with the exception of the specific short term STS improvements to be developed by the NRR Licensing Divisions (see Subsection 3.2). The Industry will work directly with the Licensing Divisions on these specific short term improvements with the TSCB role being only coordination to assure consistency with the overall objectives of the improvement program.

5.2 Policy Statement Schedule

The schedule for the activities related to the issuance of a Commission Policy Statement on TS Improvements is provided in in Appendix B.

APPENDIX A

ISSUES RAISED IN THE COMMISSION'S STAFF

REQUIREMENTS MEMORANDUM DATED FEBRUARY 21, 1986

- a. Whether implementation of the Policy should be backfitted, forwardfitted or both?
- b. If the Program is to be voluntary, how can, or should the NRC encourage participation by individual licensees?
- c. Is the 10 CFR 50.109 Backfit Rule applicable?
- d. Should the Policy Statement be codified by a change to 10 CFR 50.36, and if so, on what time schedule (perhaps after some trial use with the Policy Statement)?
- e. Whether the Policy Statement should be applicable to custom TS or should licensees wishing to take advantage of the program be required to convert to STS?
- f. Are the control mechanisms available for those items that would be removed from the TS adequate (e.g., 10 CFR 50.59)? If not, what changes are necessary?
- g. What are the NRC resource impacts in terms of both the initial implementation of the New STS and any additional staff actions related to a greater reliance on 10 CFR 50.59 or plant procedures for control?
- h. What are the risk implications of the proposed criteria? Can the risk impact of the resultant changes in TS under the criteria be quantified and if so, what is the effect? To what extent does the application of the criteria increase the uncertainty in current estimates of risk?
- i. What would be the effect of implementing of the proposed criteria on the amount of testing at power that is currently required? How does this compare to the current testing practices of other countries? To what extent can any differences that will exist be attributed to differences in design (e.g., greater redundancy and diversity of safety systems) or preventive maintenance programs?

APPENDIX B POLICY STATEMENT SCHEDULE

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DLICY STATEMENT FOR NEW STS REPORT TYPE :PERIOD BARCHART PLAN I.D. :ETECSUMM VERSION 1	100			OGRAM				PI SI T.	ELECT	ION CR	ITERIA	: ALI	Mar/8	6		ECTIO	
FERIOD COMMENCING DATE		!7		!2			!1	!6		!1	15		12		!4	!1	!
MONTH	!MAR	APR	PAN	JUN	JUL	AU6	!SEP	10CT	INDY	'DEC	!JAN	FEB	!MAR	!AFR	!HAY	!JUN	!
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13 Criteria Risk lapact (2.1.3)	1000	12321:3	C!	!	!	!	1.	!	!		!	!	!	!	!	1	1
14 Finalize Criteria (2.1.4)	100	133313	!!	!	!	!	!	!	!	!	!						
20 Policy Paper Draft #1 (2.2.1)	! 0	133313	!!	!	!	!	!	!	!	!	!	!	!	!	!	!	!
21 Internal Comment Period(2.2.2)	!	! (13331	!!	!	!	!	!	!	!	!	!	!	!	!	!	!
22 Policy Paper Draft #2 (2.2.2)	!	!	!	10000	!	!	!	!	!	!	!	!	!	!	!	!	!
23 ACRS Briefing/Review (2.2.3)	!	!	!	!	10	!	!	!	!	!	!	!	!	!	!	•	!
24 Folicy Paper Final Draft (2.2.3)	!	!	!	!	1 222 !	!!	!	!	!	!	!	!	!	•		!	
25 CR6R Presentation (2.2.4)	!	!	!	!	!	10000	!	!	!	!	!	!	!	!	!	!	!
26 Coseission Briefing/Review(2.2.5)	!	!	!	•	1	1	1000	1	1	1	1		, `	,	,	1	
27 Notice of Folicy Statement (2.2.5)	1	1			1	1		3313							1	i	
28 Public Consent Period (2.2.6)	!	!	!	!	!	!	!	: 0	12221	212							
29 Finalize Policy Statement (2.2.6)	!	!	!	!	!	!	!	!	! 000	33331	!	!	!	!	!	!	!
30 Final Consission Approval (2.2.6)	!	!	!	!	!	1	!	1		1	23313		1	,		1	
31 Issue Policy Statement (2.2.6)	!	!	!	!	!	!	!	!	!	!	! (!	!	!	!	!

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BWROG TECHNICAL SPECIFICATIONS COMMITTEE

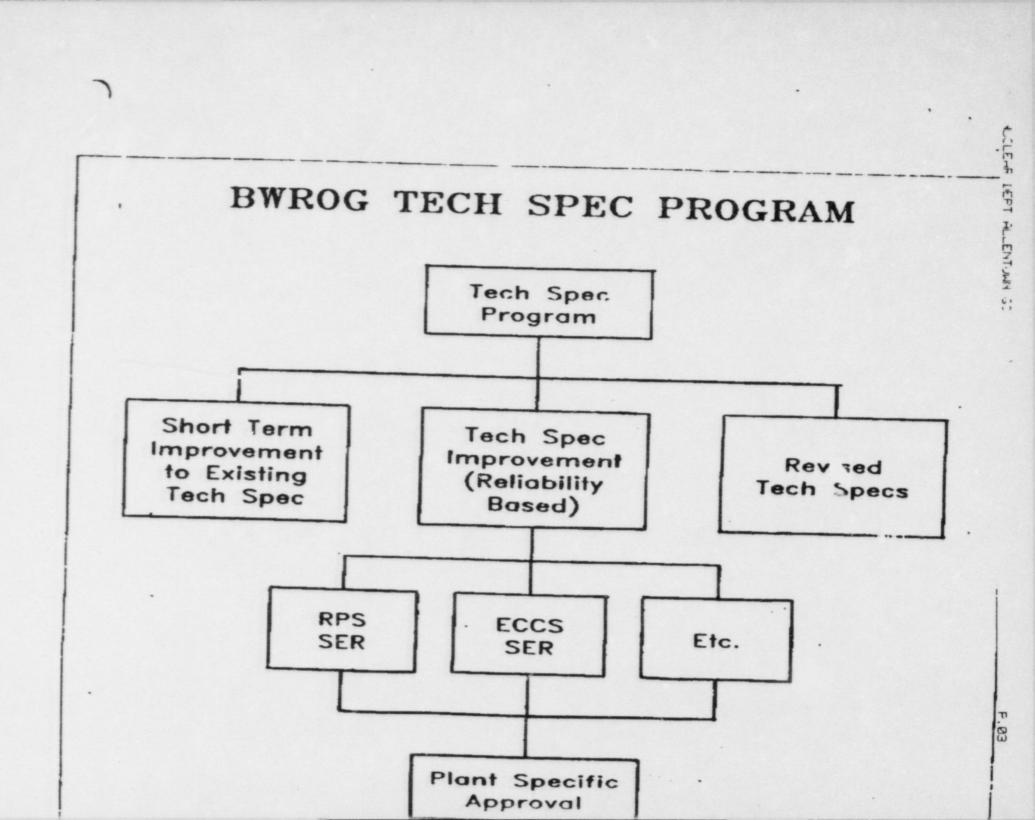
- O FORMED: JANUARY 1986
- O CHAIRMAN: R. E. BRADLEY, GPC
- 0 22 PARTICIPATING DOMESTIC UTILITIES

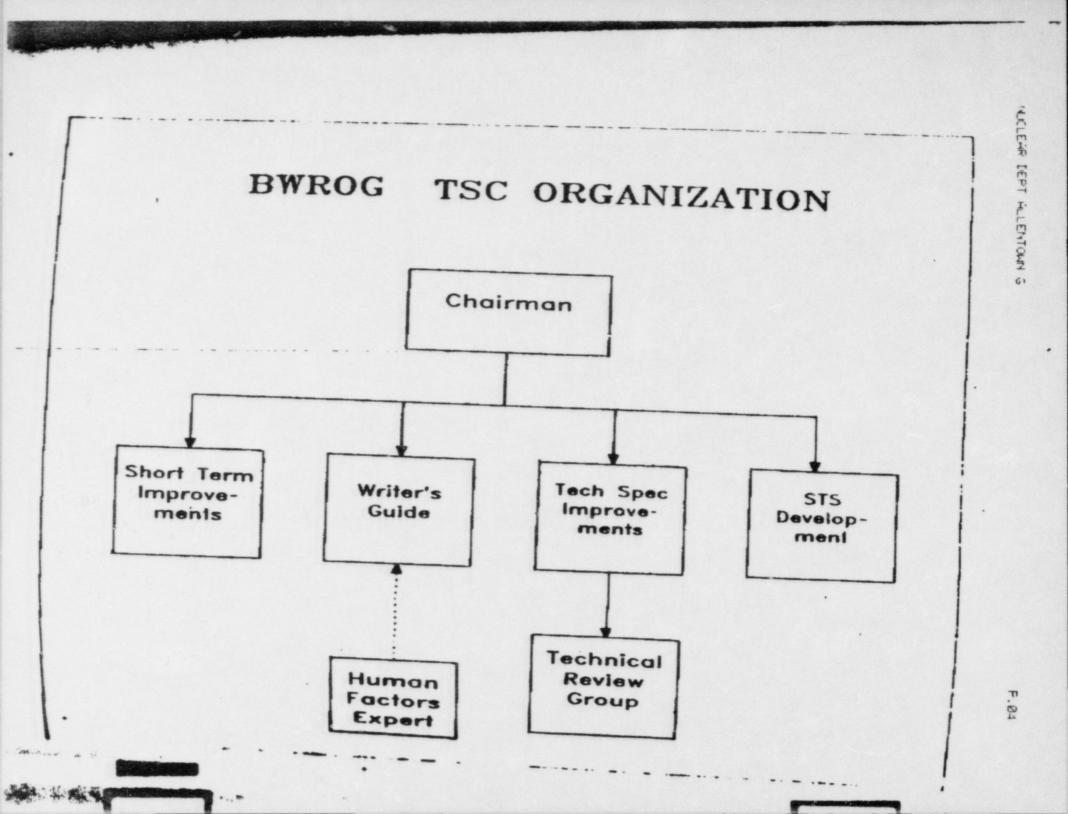
BECO	MPEL
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CEI	NPPD
CECO	NSP
DECO	NYPA
GPC	PECO
GPUN	PP&L
GSU	PSESG
IELSP	TVA
IP	VYNPC
LILCO	WPPSS

O GENESIS OF ISSUE

- UTILITY INTEREST IN DEVELOPING NEW TECHNICAL SPECIFICATIONS
- JTILITY INTEREST IN OPTIMIZING EXISTING TECH SPECS
- NEED FOR BWROG TO PARTICIPATE IN INDUSTRY TECH SPEC ACTIVITIES
- NEED TO COORDINATE BWROG TECH SPEC ACTIVITIES

Rocky Sourro (PPAL) September 9, 1986





SHORT TERM IMPROVEMENTS-CATEGORIES

P.25

CATEGORY I: NRC APPROVED ON AN INDIVIDUAL PLANT DOCKET.

- O DO NOT REQUIRE LEAD PLANT SPONSORSHIP
- O TSC RESOLVES NRC COMMENTS FROM GENERIC REVIEW OF PREVIOUS APPROVAL
- O NRC ISSUES GENERIC LETTER

NULLEMA DEFI MELLINGANT 3.

CATEGORY II: SUBMITTED TO NRC ON AN INDIVIDUAL PLANT DOCKET, BUT NOT YET APPROVED,

O FOLLOW LEAD PLANT REVIEW PROCEDURE

CATEGORY III: NCT YET SUBMITTED FOR NRC REVIEW.

O FOLLOW LEAD PLANT REVIEW PROCEDURE

NUCLEAR DEPT ALLENTOWN ST DRAFT

ATTACHMENT BWROG SHORT TERM TECENICAL SPECIFICATION IMPROVEMENTS

CATEGORY

ITEM

- I. Increase Relief Valve Setpoint Tolerance to Coincide with Design Spacification (+15psi)
- I. anubbers Reduction in Functional Retest Requirements from 10% to 5%
- Integrated Leak Rate Test Duration Decrease from 24 to 8 hours.
- I. Relaxation of Shutdown Requirements Associated with H₂/O₂ Analyzers
- I. Deletion of Isolation Actuation Instrumentation Response Times
- II. Deletion of Primary Containment Isolation Valve Listing
- II. Scram Discharge Volume (SDV)/ Vent and Drain Valve 30-Second Closure Time Elimination
- III. Diesel Generator Testing Requirements Relexation
- III. Accident Monitoring Instrumentation Allowable Out-of-Service Times Relaxation
- III. Area Temperature Monitoring Requirements Relaxation
- III. SDV Testing Eliminate Requirement to Parform 50% Rod Density Scram Surveillance Test

REFERENCE DOCUMENT

MP&L, Amendment 9 to License No. MPF-13 (Sept. 15, 1983)

Fermi 2 Full Power License #NPF-43, July 15, 1985

NMPC, Asendmant 52 to License No. DPR-63 (May 4, 1983)

IELLP, Amendment 134 to License No. DPR-49 (July 21, 1986)

(CEI) MUREG 1162, March 1986

TECHNICAL SPECIFICATION IMPROVEMENTS WORKING GROUP

SCOPE - RELIABILITY BASED ANALYSIS FOR IMPROVEMENTS IN RPS AND ECCS INSTRUMENTATION TECH SPECS

DELIVERABLES

Submittal Date

Report

- Review Status
- January 1985 NEDC 30844, 3WR Owners' Group Response to VRC Generic Letter 83-28, Item 4.5.3
- May 1985 NEDC-3085:P. BWR Owners' Group Tecnnical Specification Improvement Analysis for BWR Reactor Protection Systems
- November 1985 NEDC-30936P. Part 1 BWR Owners' Group Technical Specification Improvement Methodology (with Demonstration for BWR ECCS Actuation Instrumentation
- June 1986 NEDC-30851P, Supplement 1, Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation
- August 1986 NEDC-30851P, Supplement 2, Technical Specification Improvement Analysis for BWR Isolation Instrumentation Common to Reactor Protection System and ECCS
- September 1986 NEDC 30936P, Part 2 BWR Owners' Group (Planned) Technical Specification Improvement Methodology (with Demonstration for BWR ECCS Actuation Instrumertation)

NRC technical review complete SER delayed due to staggered testing issue.

NRC Tecnnical Review Complete for relay plants. SER delayed due to staggered testing issus. Solid state plant evalution currently under technical review.

Currently under review by NRC/ Brookhaven. SER expected in Nov. 1986.

NRC is currently preparing contract for BNL review.

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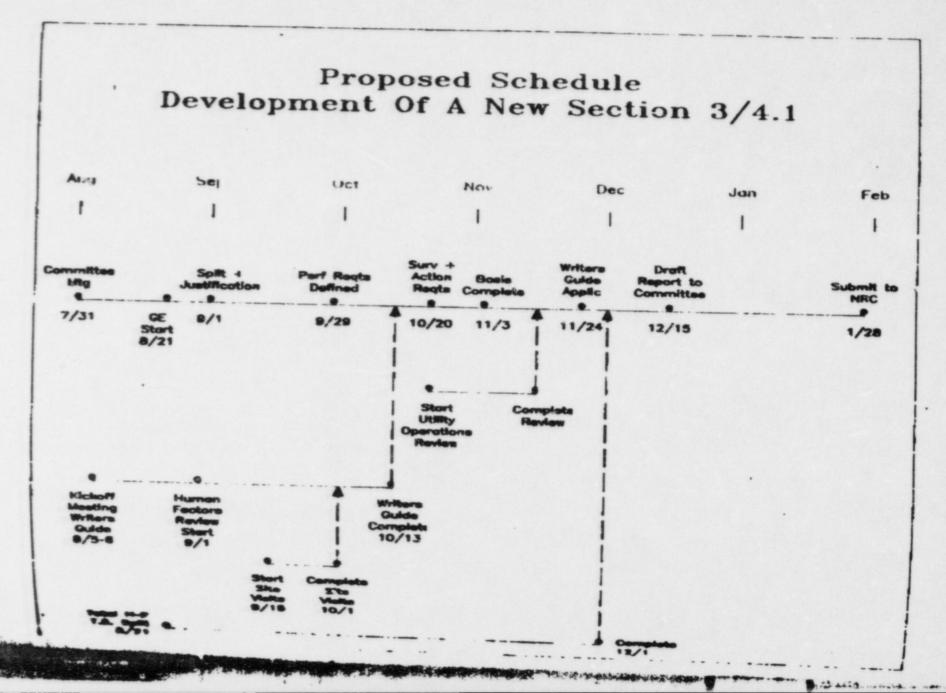
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POTENTIAL ADDITIONAL ACTIVITIES

- C SUPPORT NRC REVIEWS
- O DEVELOP UTILITY MANUAL

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- C HOLD TRAINING SESSION
- O EVALUATE ADDITIONAL RELIABILITY-BASED SPEC IMPROVEMENTS FOR TECH SPEC COMMITTEE LONG-RANGE PROGRAM



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F.03

IMPROVEMENTS SUBCOMMITTEE TECHNICAL SPECIFICATION

- REPORTS TO THE COMMITTEE ON REACTOR LICENSING AND SAFETY
- ALAN PASSWATER, SUPERINTENDENT OF LICENSING, UNION ELECTRIC COMPANY · CHAF VAN:
- TECHNICAL SPECIFICATION IMPROVEMENTS COORDINATE, PROPOSE AND PROMOTE · PURPOSE:
- MEMBERSHIP: REPRESENTATIVES FROM:

CHAIRMAN OF EACH OF THE FOUR VENDOR OWNERS GROUPS TECHNICAL SPECIFICATION SUBCOMMITTEES CHARRAM, MUCLEAR POWER PLANT STANDARDS WORKING GROUP, ANS-58.4

SEMILITIN NEELINA

FOUR VENDORS

P.10

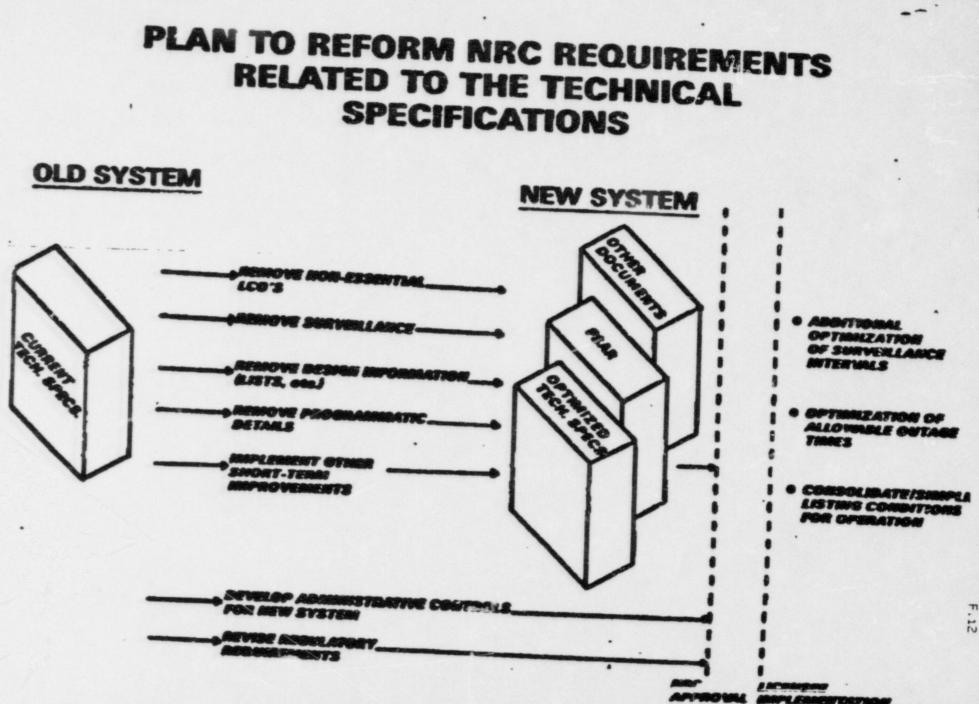
THERE ARCHITECT ENGINEERING FIRMS

TWO CONSULTING FIRMS

NUCLEAR DEFT ALLENTING :

ESTABLISHED WORKING GROUPS

- WORKING GROUP ON CRITERIA DEVELOPMENT
- WORKING GROUP ON THE ADMINISTRATIVE PROCESS
- WORKING GROUP ON REGULATORY CHANGES
- WORKING GROUP ON PROBABILISTIC METHODOLOGY



15 3:00 P.M. SEVERE ACCIDENT POLICY/DEGRADED CORE PROGRAM

R. BERNERO (NRC)

·.,

SAFETY OBJECTIVES

 THE LIKELIHOOD OF SEVERE ACCIDENT (CORE DAMAGE OR CORE MELT) SHOULD BE VERY LOW

AND

• IF A SEVERE ACCIDENT OCCURS THERE SHOULD BE SUBSTANTIAL ASSURANCE THAT THE CONTAINMENT WILL MITIGATE ITS CONSEQUENCES

CONTAINMENT ISSUES

- EARLY REACTORS
 - LOW POWER/BIG CONTAINMENTS
 - COULD MEET CONTAINMENT OBJECTIVE
- EVOLUTION OF DESIGN
 - MUCH HIGHER POWER
 - FOCUS ON PREVENTION OBJECTIVE
 - CONTAINMENT GOOD FOR FISSION PRODUCTS BUT QUESTIONS ABOUT HEAT AND GAS
- REACTOR SAFETY STUDY (1975)
 - BIGGER REACTORS
 - 1 PWR (SURRY)
 - -, 1 BWR (PEACH BOTTOM)
 - BWR RESULTS INDICATED LOWER PROBABILITY BUT POOR CONTAINMENT

US BWRS

2 SMALL UNITS WITH LARGE CONTAINMENTS

.

- 24 BWR 2/3/4 WITH MARK I CONTAINMENT (ALL LICENSED)
- 9 BWR 4/5 WITH MARK II CONTAINMENT (7 LICENSED)
- 4 BWR 6 WITH MARK III CONTAINMENT (3 LICENSED)

BWR CONTAINMENT IN

SEVERE ACCIDENTS

- SINCE TMI

- TMI ACTION PLAN I.C
 - LETTERS OF SEPT-NOV, 1979 ON PROCEDURES
 - BWR EPG, REV 1, REV 2, REV 3, REV 4
- IDCOR ANALYSIS
 - IDCOR FOUNDED DECEMBER 1980
 - STILL DELIBERATING ANALYSIS WITH NRC
- NRC/CONTRACTOR ANALYSIS
 - SOURCE TERM STUDIES
 - SARRP WHAT WILL NUREG-1150 SAY?
 - BNL GUIDELINES AND CRITERIA
- CHERNOBYL
 - UNIT 4 HAD PRESSURE SUPPRESSION CONTAINMENT FEATURES A STRIKING RESEMBLANCE?

WHAT ARE THE PROBLEMS AND SOLUTIONS

- 5 ELEMENTS TO CONSIDER
 - HYDROGEN
 - SPRAYS
 - PRESSURE
 - CORE DEBRIS
 - TRAINING & PROCEDURES
- MANY CHANGES ARE ALREADY IN PLACE
- FINAL IMPROVEMENTS ARE NOW UNDER HIGH PRIORITY STUDY
 - GENERIC ACTION WITH IDCOR AND BWROG
 - GENERIC WORK BY NRC
 - VERMONT YANKEE STUDY
 - PILGRIM PROGRAM

CHRONOLOGY

- JUNE 16, 1986: MEETING WITH BWROG/IDCOR PROPOSED A GENERIC LETTER, PRESCRIPTIVE SOLUTION, BY BACKFIT
- JUNE 30, 1986: VERMONT YANKEE COMMITS TO GOV. KUNIN TO DO A SPECIAL 60-DAY CONTAINMENT STUDY
- JULY 25, 1986: BOSTON EDISON COMPANY BOARD DECIDES TO FIX PILGRIM CONTAINMENT
- AUGUST 19, 1986: BWROG EXECUTIVES VOTE TO FUND AND CONTINUE DIALOGUE ON THIS WITH NRC, CONTACT NUMARC ABOUT BWR VS. PWR
- SEPTEMBER 11, 1986: MEETING WITH BWROG TO COMPARE BACKFIT NOTES AND STRAWMAN GENERIC REQUIREMENTS
- SEPTEMBER 11, 1986: MEETING WITH VERMONT YANKEE TO REVIEW CONTAINMENT STUDY
- SEPTEMBER 23, 1986: NRC/IDCOR MEETING ON BWR/MARK I ANALYSES
- SEPTEMBER 23, 1986: ACRS SUBCOMMITTEE ON CONTAINMENT PERFORMANCE TO DISCUSS HARPERS FERRY WORKSHOP RESULTS AND BWR CONTAINMENT GENERIC APPROACH
- SEPTEMBER 24, 1986: ACRS SUBCOMMITTEE ON CLASS 9 ACCIDENTS TO DISCUSS BWR/MARK I ANALYSES AND SEVERE ACCIDENT PROGRAM
- NOVEMBER 19, 1986: CRGR REVIEW OF DRAFT GENERIC LETTER ON BWR CONTAINMENT REQUIREMENTS (TO BE PUBLISHED FOR COMMENT)
- DECEMBER 17, 1986: ISSUE DRAFT GENERIC LETTER ON BWR CONTAINMENT REQUIREMENTS FOR PUBLIC COMMENT
- APRIL 1987: ISSUE FINAL GENERIC LETTER ON BWR CONTAINMENT REQUIREMENTS