

From: [Krepel, Scott](#)
To: [Brian Mann](#)
Cc: [Donoghue, Joseph](#); [Ross-Lee, MJ](#); [Patton, Rebecca](#); [Lukes, Robert](#); [Jordan, Natreon](#); [Nolan, Ryan](#); [Parks, Benjamin](#); [Lehning, John](#); [Dean, Jeremy](#); [Hamm, Matthew](#); [Honcharik, Michelle](#); [Beaton, Robert](#); [Beaulieu, David](#)
Subject: RE: Draft Traveler for NRC Feedback - TSTF-588, Rev. 0, "Remove List of COLR Methods"
Date: Wednesday, August 04, 2021 5:30:04 PM
Attachments: [image001.png](#)

Brian,

You may remember me as the branch chief for the Nuclear Systems Performance Branch. I've been involved in the discussion related to the TSTF-588 draft traveler, and I was asked to convey some technical staff feedback for your consideration in advance of tomorrow's quarterly TSTF meeting.

The NRC staff has discussed the proposal in draft traveler TSTF-588 internally and with management. The proposal in draft TSTF-588 appears to conflict with regulatory requirements under 10 CFR 50.36 and 10 CFR 50.59 and may not provide for safe facility operation.

10 CFR 50.36(c)(2)(i) requires that the TS have Limiting Conditions for Operations (LCOs). 10 CFR 50.36(c)(2)(ii)(2) requires LCOs for "a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." Cycle-specific parameter operating limits (OLs) are in TS LCOs to meet this requirement. As explained in Generic Letter 88-16 (ADAMS Accession No. ML031130447), in lieu of the OL values being explicitly expressed in the LCOs, the OL values were moved to the COLR, which is referenced in the LCOs. The methodologies used to calculate the OL values are listed in Specification 5.6.3 of the STS. Because COLR methods are referenced in TS, the NRC staff must review and approve their implementation in a license amendment request. NRC staff approval to implement new COLR methods in the TS provides regulatory control, reasonable assurance of safety, and administrative control over the OLs, thereby, assuring compliance with 10 CFR 50.36 requirements and ensuring power plants remain bounded by their safety analyses.

The NRC maintains regulatory oversight of the OLs via the review of license amendment requests to change the COLR references in the TS. The TSTF-588 proposal effectively removes the OLs from the TS. Therefore, if the COLR references are removed from the TS, 10 CFR 50.36 requirements may no longer be met.

The NRC recognizes that under the draft TSTF-588 proposal, licensees would presumably be implementing methods described in NRC-approved topical reports. An additional consideration is that these NRC-approved topical reports have not been reviewed with the TSTF-588 approach in mind. Presently, approved topical reports that describe COLR methods were approved based on an understanding, in most cases, that their downstream implementation would also require plant-specific license amendment requests. The staff's concern is that attempting to develop approval conditions for such methods with an understanding that their implementation would not be reviewed regularly on a plant-specific basis, would make the associated topical report review process impractical and unwieldy, as well as introducing complications in the process used by NRC staff to reach their findings.

The NRC staff is prepared to engage with the TSTF to discuss any potential paths forward, including possible alternatives to the draft TSTF-588 proposal as written.

Cordially yours,

Scott Krepel

Branch Chief
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U. S. Nuclear Regulatory Commission

OWFN 10-H12
423-331-0893 (text message)

From: Brian Mann <brian.mann@excelservices.com>
Sent: Monday, April 26, 2021 10:58 AM
To: Honcharik, Michelle <Michelle.Honcharik@nrc.gov>
Subject: [External_Sender] Draft Traveler for NRC Feedback - TSTF-588, Rev. 0, "Remove List of COLR Methods"

Michelle,

Attached for NRC consideration and feedback is draft traveler TSTF-588, "Remove List of COLR Methods." TSTF-588 is applicable to all plant types.


The TSTF and NRC discussed revision of the Core Operating Limits Report TS requirements in a workshop held on November 6, 2020. The TSTF considered the discussion and incorporated NRC comments into the draft traveler.

We would like to obtain feedback from the NRC on the completeness of the draft traveler prior to formally submitting the traveler for review.

We are available for a teleconference to discuss any NRC comments at your convenience.

Should you have any questions, please contact me.

Brian

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