



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

September 20, 2022

MEMORANDUM TO: Victor G. Cusumano, Branch Chief  
Technical Specifications Branch  
Division of Safety Systems  
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager  
Technical Specifications Branch  
Division of Safety Systems  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF SEPTEMBER 12, 2022, MEETING WITH THE  
TECHNICAL SPECIFICATIONS TASK FORCE RE: REVISED DRAFT  
TRAVELER TSTF-588, "REVISE LIST OF COLR METHODS"

On September 12, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff held a public teleconference with members of the Technical Specifications Task Force (TSTF). The purpose of the meeting was for the NRC staff and the TSTF to discuss NRC staff feedback and comments on revised draft traveler TSTF-588, "Revised List of COLR [Core Operating Limits Report] Methods" (ADAMS ML22244A219). The meeting notice is available in the ADAMS at Accession No. ML22244A219. A list of attendees is enclosed.

The NRC staff explained how the current proposal would not meet the regulatory requirements for Technical Specifications (TS). This included a discussion on how and why the current TS are structured. The NRC staff explained that one acceptable method of controlling reactor physics parameters in TS to assure conformance to 10 CFR 50.36 is to specify the specific value(s) determined to be within specified acceptance criteria (usually the limits of the safety analyses) using an approved calculation methodology. An alternative means of controlling the values of reactor physics parameters in TS (e.g., cycle-specific parameters) that also assures conformance to the 10 CFR 50.36 requirement that TS specify the lowest functional performance levels acceptable for continued safe operation is by specifying the calculation methodology and acceptance criteria. The reason this alternative means assures conformance with 10 CFR 50.36 is: (1) Administrative Controls TS for the COLR specifies the inclusion of the specific calculation methodology and acceptance criteria thereby providing a direct link to the specific NRC-approved methodology used to calculate the values previously listed in the TS, and (2) this arrangement allows the actual values, previously listed in the TS, to be consistently reproduced and controlled. Therefore, with respect to assuring conformance with 10 CFR 50.36, the inclusion of the specific methodology in the TS is equivalent to listing a particular parameter in the TS that is calculated by the methodology because the values can be consistently reproduced and, importantly, the change controls are the same (all changes to the TS require prior NRC approval).

CONTACT: Michelle C. Honcharik, NRR/DSS  
301-415-1774

The TSTF proposal to relocate the specific methodology from TS to the FSAR does not assure conformance with 10 CFR 50.36 because under 10 CFR 50.59 licensees may make certain changes to the specific NRC-approved methodology without NRC approval. The imposition of obligations or regulatory requirements are reserved for matters that satisfy the criteria of 10 CFR 50.36 or are otherwise found to be of high safety or regulatory significance. In such matters concerning the adequate protection of the public health and safety, changes to obligations cannot generally be made by licensees without prior NRC approval.

Pertinent to this, and in response to justifications in the TSTF's revised draft traveler, the statements of consideration for the 10 CFR 50.59 rulemaking (64 FR 53582, dated 10/4/1999) explicitly state that the current administrative controls for the COLR were adequate as-is and did not require changes or clarifications in concert with the revisions to 10 CFR 50.59 being made at the time.

The TSTF agreed to take the staff comments under consideration as they decide how or if to continue to develop this draft Traveler.

No public comments were received.

Project No. 753

Enclosure:  
As stated

cc: See next page

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**DISTRIBUTION:**

RidsNrrOd Resource	RidsResOd Resource	C.Jackson, NRR
RidsNrrDp Resource	V.Cusumano, NRR	D.Beaulieu, NRR
RidsOgcMailCenter	M.Honcharik, NRR	B.Parks, NRR
RidsOpaMail Resource	M.Hamm, NRR	R.Nolan, NRR
RidsACRS_MailCTR	S.Krepel, NRR	
RidsNrrDssStsb Resource	J.Lehning, NRR	

**ADAMS Accession No.: Package: Meeting summary:** ML22256A214; **Meeting notice:** ML22244A219

**NRR-106**

<b>OFFICE</b>	NRR/DSS/STSB	NRR/DSS/STSB
<b>NAME</b>	VCusumano	MHamm for MHoncharik
<b>DATE</b>	09/20/2022	09/20/2022

**OFFICIAL RECORD COPY**

## LIST OF ATTENDEES

### **NRC Staff**

Cusumano, Victor  
Krepel, Scott  
Honcharik, Michelle  
Hamm, Matthew  
Lehning, John  
Jackson, Christopher  
Beaulieu, David  
Parks, Benjamin  
Nolan, Ryan

### **TSTF**

Mann, Brian (TSTF, EXCEL Services)  
Sparkman, Wesley A.  
Lueshen, Kevin  
Richards, Drew

### **Industry/Public**

Bergman, Jana (Scientech)  
Gross, Karl (NuScale Power)  
Mount, Brian  
Phillippe, Aaron  
Holt, Amy  
Andrachek, James  
Wells, Lewis E:(Constellation Nuclear)  
Staum, Christopher J:(Constellation Nuclear)

Technical Specifications Task Force Project No. 753

cc:

Technical Specifications Task Force  
c/o EXCEL Services Corporation  
11921 Rockville Pike, Suite 100  
Rockville, MD 20852  
Attention: Brian D. Mann  
E-mail: brian.mann@excelservices.com

Drew Richards  
STP Nuclear Operating Company  
12090 FM 521  
Mail Code: N5016  
Wadsworth, TX 77483  
Email: amrichards@stpegs.com

Kevin Lueshen  
Constellation Energy Generation  
4300 Winfield Road  
Warrenville IL 60555  
Email: kevin.lueshen@constellation.com

Jordan L. Vaughan  
Duke Energy  
EC07C / P.O. Box 1006  
Charlotte, NC 28202  
Email: jordan.vaughan@duke-energy.com

Ryan M. Joyce  
Southern Nuclear Operating Company  
3535 Colonnade Parkway / Bin N-274-EC  
Birmingham, AL 35243  
Email: rmjoyce@southernco.com

Wesley Sparkman  
Southern Nuclear Operating Company  
3535 Colonnade Parkway / Bin N-226-EC  
Birmingham, AL 35242  
Email: wasparkm@southernco.com