



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

December 11, 2024

MEMORANDUM TO: Shivani Mehta, Chief
Technical Specifications Branch
Division of Safety Systems
Office of Nuclear Reactor Regulation

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

SUBJECT: SUMMARY OF NOVEMBER 13, 2024, PUBLIC MEETING WITH THE
TSTF RE: TSTF-585 (EPID L-2023-PMP-0000)

On November 13, 2024, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and members of the Technical Specifications Task Force (TSTF) at NRC headquarters in Rockville, Maryland. The meeting notice and agenda, dated October 29, 2024, are available in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML24303A237. A list of attendees is provided in the enclosure.

The purpose of the meeting was for the NRC staff and TSTF members to discuss scenarios of how a licensee would implement the TS changes proposed in Draft Revision 3 to TSTF-585, "Revise LCO [limiting condition for operation] 3.0.3 to Require Managing Risk" (ML24016A270). Prior to the meeting, the NRC provided the TSTF with proposed scenarios to discuss during the meeting (ML24302A210) and the TSTF provided the NRC staff with meeting slides (ML24318B831).

During the meeting, the TSTF representatives described the changes (e.g., additions, deletions) to TSTF-585, Draft Revision 3, and noted that there were some errors in the draft revision 3 that will be corrected. The TSTF members also explained the reason why they were requesting the proposed changes. They then ran through several hypothetical situations and how a licensee would operate the plant if the proposed changes were adopted. The TSTF also ran through the same explanation with the scenarios that the NRC provided. NRC staff explained that the traveler would need to be revised so that the staff would have regulatory and safety justifications to prepare the safety evaluation. The TSTF stated that they plan to submit a revision to the traveler in early 2025. The TSTF and NRC discussed the following changes in the traveler:

1. Expand the discussion to justify why the change from a 1-hour to a 6-hour delay in LCO 3.0.3 is safe and continues to protect the public health and safety.
2. Earlier versions of the traveler stated that a level of risk for continued operation for 24 hours was "normal work controls" (that is, $< 1E-6$ ICDP). The TSTF plans to change the traveler to an acceptable risk of $< 1E-5$ ICDP if risk management actions are taken, and non-quantifiable factors are assessed. The NRC requested:

- a. That the traveler more fully explains how risk is determined (i.e., starting with the baseline risk), including the time when additional risk is being accumulated.
 - b. A more complete discussion of Risk Management Actions (RMAs).
 - c. That the TSTF consider adding a threshold for “instantaneous risk” to avoid high-risk failures that should result in shutdown.
 - d. That the TSTF discuss the basis for “conservative operation actions” to shut down the plant in less than 6 hours if appropriate.
3. Discuss planned LCO 3.0.3 entries.
4. The Bases discuss the scenario of risk being acceptable and the 24-hour delay period be applied and a subsequent change in plant conditions resulting in the risk being unacceptable and a plant shutdown being initiated immediately (if past the initial 6 hours after LCO 3.0.3 entry).
5. Discuss cross-unit dependencies resulting from shared systems at multi-unit sites.
6. Clarify that the quantitative limit means that the condition must be evaluated quantitatively.
 - a. This led to a discussion of obvious low-risk conditions, such as all RCS leakage monitors being inoperable, but which are not modeled in the PRA.
 - b. To not permit the use of the 24-hour delay time in those situations is inconsistent with the intent of the traveler and plant safety.
 - c. The TSTF will examine developing criteria for those low-risk conditions which cannot be quantitatively modeled.
7. Require documentation of the determination that the risk of continued plant operation is acceptable. For example, the SR 3.0.3 Bases state, “The evaluation should be documented in sufficient detail to allow a knowledgeable individual to understand the basis for the determination.”
8. Revise the proposed LCO 3.0.3 wording to refer to “appropriate risk management actions” instead of “required risk management actions.”
9. Revise the proposed LCO 3.0.3 to state, “If the risk assessment determines that continuing operation is not acceptable, the risk assessment was not completed performed, ...” to not imply that the risk assessment is not required to be performed.
10. Provide the Event Report and LER data described in the traveler.
11. The NRC asked if the LCO 3.0.3 Bases should be revised to include a Reviewer’s Note that captures the same verification as included in the model application, “[LICENSEE] confirms Section 11 of NUMARC 93-01, including the action thresholds under normal work controls, will be used to perform the LCO 3.0.3 risk assessment to determine whether continued plant operation is acceptable.” The TSTF will evaluate the request.

No regulatory decisions were made during the meeting. No public meeting feedback or feedback forms were received. Please direct any inquiries to me at 301-415-1774 or michelle.honcharik@nrc.gov.

Project No: 0753

Enclosure:
List of Attendees

LIST OF ATTENDEES

NOVEMBER 13, 2024, MEETING WITH THE TSTF RE: DRAFT REVISION 3 TO TSTF-585

Name	Organization
Michelle Honcharik	U.S. Nuclear Regulatory Commission (NRC)
Tarico Sweat	NRC
Khadijah West	NRC
Michelle Kichline	NRC
David Gennardo	NRC
Rob Elliott	NRC
Shivani Mehta	NRC
John Hughey	NRC
George Gerond	NRC
Antonios Zoulis	NRC
Mihaela Biro	NRC
Craig Harbuck	NRC
Ed Miller	NRC
Ravi Grover	NRC
Edmund Kleeh	NRC
Clint Ashley	NRC
Luke Haeg	NRC
Matthew Hamm	NRC
Derek Scully	NRC
Chris Rojas	NRC
Joshua Wilson	NRC
Andrea Russell	NRC
Norbert Carte	NRC
Mark Schwieg	NRC
Vijay K Goel	NRC
Bob Pascarelli	NRC
Zach Turner	NRC
Wendell Morton	NRC
Steve Smith	NRC
April Pulvirenti	NRC
Adrienne Brown	NRC
Brian Mann	Technical Specifications Task Force (TSTF)
Drew Richards	TSTF
Shane Jurek	TSTF
Jordan Vaughan	TSTF
Wes Sparkman	TSTF
Kevin Lueshen	TSTF
Rebecca Steinman	TSTF
Jim Lynde	Pressurized water reactor owners' group (PWROG)
Jim Andrachek	PWROG
Keith Vincent	PWROG
Victoria Anderson	Nuclear Energy Institute (NEI)
Phil Couture	Entergy
Timothy Falkiewicz	Industry
Chad Holderbaum	PWROG
Kristin Kaspar	Industry

Enclosure

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TSTF-585 (EPID L-2023-PMP-0000) DATED DECEMBER 11, 2024

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Tarico Sweat

Khadijah West

Michelle Kichline

David Gennardo

Rob Elliott

Shivani Mehta

John Hughey

George Gerond

Antonios Zoulis

Mihaela Biro

Craig Harbuck

Ed Miller

Ravi Grover

Edmund Kleeh

Clint Ashley

Luke Haeg

Matthew Hamm

Derek Scully

Chris Rojas

Joshua Wilson

Andrea Russell

Norbert Carte

Mark Schwieg

Vijay K Goel

Bob Pascarelli

Zach Turner

Wendell Morton

Steve Smith

April Pulvirenti

Adrienne Brown

ADAMS Accession Nos.:

Package: ML24324A176

Meeting Notice: ML24303A237

Meeting handouts: ML24302A210, ML24318B831

Meeting Summary: ML24324A178

OFFICE	NRR/DSS/STSB/BC	NRR/DSS/STSB/PM
NAME	SMehta	MHoncharik
DATE	12/11/2024	12/11/2024

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