

50-334/412



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

November 18, 1999

LICENSEE: Duquesne Light Company (DLC)
FACILITY: Beaver Valley Power Station, Units 1 and 2 (BVPS-1 and BVPS-2)
SUBJECT: SUMMARY OF OCTOBER 14, 1999, MEETING WITH DLC STAFF TO DISCUSS GENERAL ASPECTS OF IMPROVED STANDARD TECHNICAL SPECIFICATION CONVERSION PROCESS

On October 14, 1999, Nuclear Regulatory Commission (NRC) staff met with representatives of DLC to have a general discussion regarding the Improved Standard Technical Specification (ISTS) conversion process. The licensee had requested this meeting. Enclosure 1 is a list of meeting attendees. Enclosures 2 and 3 are copies of the handout material.

DLC initially discussed their current and near-term activities for making a submittal to convert to the ISTS and presented, in general terms, their project plan for the conversion. DLC stated their intent to perform the conversions for BVPS-1 and BVPS-2 simultaneously, but that the technical specifications (TSs) for the plants will be separate. DLC is following current Nuclear Energy Institute (NEI) and NRC guidance for format and content of ISTS, and will attempt to have the final BVPS-1 and BVPS-2 TSs as identical as possible. There will be some differences, however, as a result of differences in plant design/construction. Additionally, DLC will be coordinating their conversion project with separate amendment requests to relocate some existing requirements from TSs to their Licensing Requirements Manual (LRM).

The NRC staff discussed the review process and some lessons learned from conversions conducted by other utilities. The staff stated that a typical turnaround for issuance of an ISTS conversion is on the order of 18 months. The staff noted the following during the discussion:

- In rough terms, the current review process is: initial review; assignment of lead Technical Specification Branch member; development of project schedule; issue Requests for Additional Information (RAI's); Quality Assurance (QA) Branch review of QA Program; preparation of safety evaluation; Issuance of ISTS.
- Use of the existing NEI guidance may be acceptable, but licensees should not try to incorporate unapproved Technical Specification Task Force changes in the conversion process.
- Changes which are not consistent with existing standard TSs or are not part of the current licensing basis are considered to be "beyond scope" changes and must be separately noticed in the Federal Register and reviewed by the NRC staff. Most RAIs from previous conversions were the result of beyond scope changes.
- Incorporation of a new surveillance into the TSs as part of the conversion, but changing the surveillance frequency to something greater than that contained in the existing standard TSs is considered to be beyond scope.

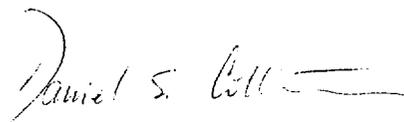
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- Close coordination is required to ensure that conflicts don't arise between ISTS changes in review and separate TS amendments.
- NRC staff consider relocation of TS requirements to the Updated Final Safety Analysis Report (UFSAR), LRM, or QA Plan to be a relocation. Relocation of TS requirements to plant procedures, however, is considered to be a deletion of the TS requirements.
- Trip setpoints should have allowable values without use of inequality signs. Loss of Power Instrumentation requires upper and lower limit allowable values.
- Submittals on separate issues sent in during the conversion process should be done in both the current TS and ISTS formats.
- It is acceptable for a utility to maintain its current licensing basis when converting to ISTS. However, for changes that deviate from the standard TSs, legitimate reasons for the deviation must be explicitly provided in a justification for the deviation. It is not sufficient to simply state that a similar deviation was approved for another utility.

Finally, DLC asked when, in the review process, the final typed versions of the ISTS will need to be provided to the NRC. The staff agreed to follow-up on that question and provide an answer which is consistent with the current practices. Subsequent to the meeting, the NRC staff determined that the final typed versions of the ISTS must be received by the NRC prior to publication of the Notice of Consideration of Issuance in the Federal Register.



Daniel S. Collins, Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-334 and 50-412

Enclosures: 1. List of Attendees
2. Licensee Handout
3. NRC Handout

cc w/ encls: See next page

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DATE	11/17/99		11/17/99	11/17/99	11/18/99

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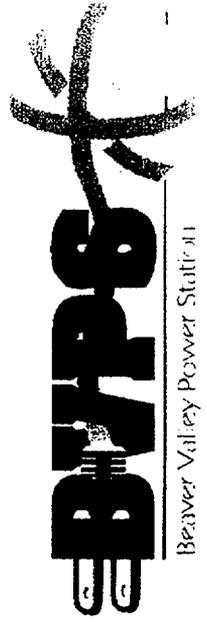
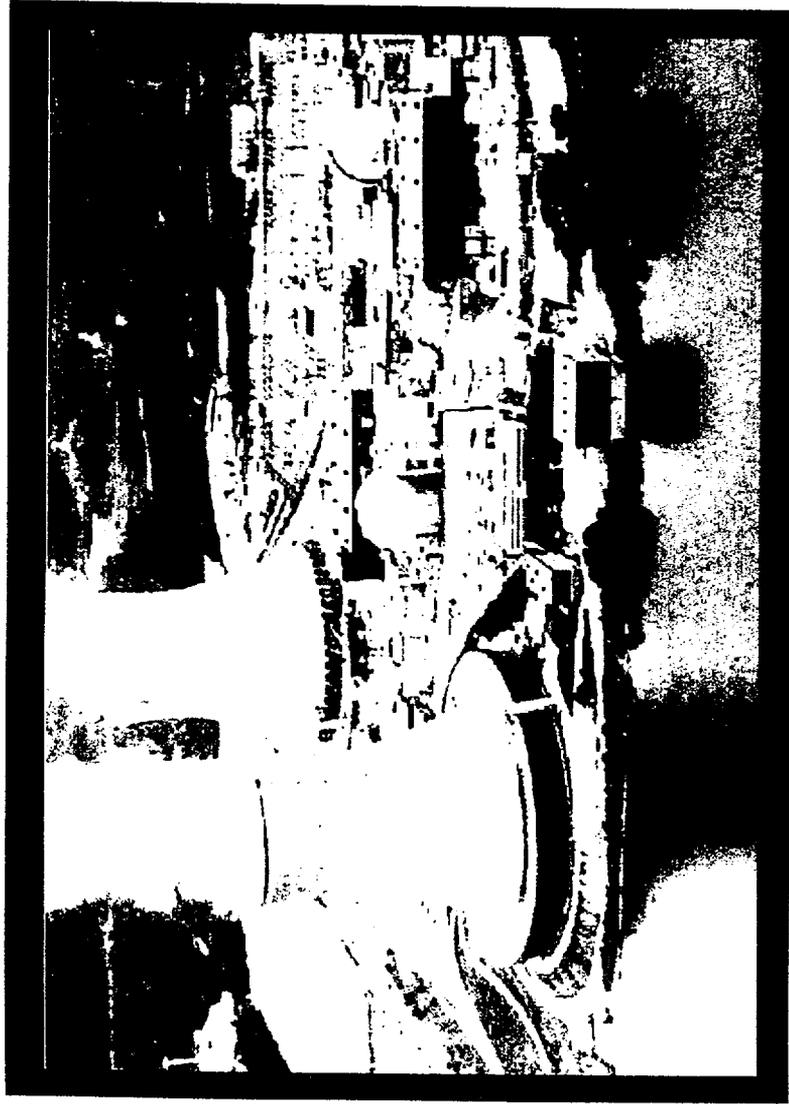
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LIST OF ATTENDEES

SUMMARY OF OCTOBER 14, 1999, MEETING WITH DLC STAFF TO DISCUSS GENERAL ASPECTS OF IMPROVED STANDARD TECHNICAL SPECIFICATION CONVERSION PROCESS

<u>NAME</u>	<u>ORGANIZATION</u>
W. Beckner	NRC/NRR/RTSB
D. Collins	NRC/NRR/DLPM
C. Schulten	NRC/NRR/RTSB
R. Hart	DLC/Licensing
K. Halliday	DLC/Engineering
J. Matsko	DLC/Operations
K. Frederick	DLC/Engineering
T. Dometrovich	DLC/Licensing
F. Ferri	Excel Services

BVPS- NRC ISTS Meeting



Agenda

- Desired Outcomes
- ISTS Schedule
- ISTS Guidelines

Desired Outcomes

- BVPS status on ISTS Conversion
- Schedule
- NRC perspective on ISTS submittal

ISTS Schedule

- ISTS Project Start
- ISTS NRC Submittal
- Non ISTS Technical Specification Submittals
- ISTS Implementation

ISTS Guidelines

- Plant Differences
- Current Licensing Basis vs. ISTS
- NUREG 1431 Status
- General Questions for NRC

Conversion Screening Checklist

Plant Name: _____

Section: _____

Section Lead: _____

QUESTION	YES	NO	COMMENTS
1. Does the submittal include a CTS markup and associated DOCs, an STS markup and associated JFDs, and a clean copy of the proposed ITS?			
2. Is the CTS markup legible, clearly marked, and easy to follow?			
3. Is the STS markup legible, clearly marked, and easy to follow?			
4. After reading a sampling of the administrative change DOCs, does it appear that the licensee has correctly categorized these changes as administrative (i.e., there are no hidden technical changes)?			
5. After reading a sampling of the less restrictive DOCs, does it appear that the licensee has provided adequate technical justification to support the less restrictive changes?			
6. After reading a sampling of the less restrictive DOCs, does it appear that the licensee has identified all of the major beyond scope changes in the submittal cover letter?			

* Desired response to all questions is "yes."

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Conversion Screening Checklist

QUESTION	YES	NO	COMMENT
7. After reading a sampling of the more restrictive DOCs, does it appear that the licensee has provided a reason for adding the new requirement, other than simply stating that it is consistent with the STS?			
8. After reading a sampling of the JFDs, does it appear that the licensee has adequately justified differences from the STS?			
9. After reading a sampling of the JFDs, does it appear that the licensee has identified pending TSTF travelers and potentially new generic changes?			

* Desired response to all questions is "yes."
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