

TSTF Technical Specifications Task Force
A Joint Owners Group Activity

The TSTF Traveler Process

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Introduction

- The Technical Specifications (TS) have a huge influence on day-to-day plant operation.
- Licensees are frequently changing their TS.
 - The NRC receives hundreds of licensing actions a year, the majority of which are license amendment requests (LARs) changing the TS.
 - LARs can cost hundreds of thousands of dollars in NRC review fees (not including internal development and review costs), and can take up to two years for review.
- TSTF Travelers provide a proven, cost-effective process for streamlining the LAR process.

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TS Impact on Plant Operations

Compliance with the TS is paramount to plant operations. Examples of impacts on operation include the following:

- Operations
- Outage Scope
- Maintenance Activities
- Scheduling
- Corrective Action
- Staffing

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TS History

- Initially, there were no specific criteria on what should be in the TS, the level of detail and types of requirements varied from plant to plant.
- In the early 1970's the NRC developed and required the use of "Standard Technical Specifications" (STS) on a forward-fit basis.
- The NRC would periodically issue new versions of the STS, but there was no explanation of what changed or why.
- Following the accident at Three Mile Island, the NRC and industry grew concerned that aspects of the TS may be adverse to safety.
 - NRC determined the need to define criteria for what should be in the TS, address human factor issues, and correct technical weaknesses

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Path Forward

- The NRC issued a Policy Statement on TS and revised 10 CFR 50.36 to incorporate specific criteria for those items to be included in the TS.
- The NRC and industry worked together to develop the Improved Standard Technical Specifications (ISTS).
 - Documented in NUREG-1430 thru 1434 and NUREG-2194
- These ISTS are VERY standardized, with similar requirements for similar systems across the five nuclear steam supply system (NSSS) designs.
- The format and content are synchronized and documented in a Writer's Guide.
- Currently, 78 of 98 operating units have TS based on the ISTS. All new plants have TS based on the ISTS.

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Early Traveler Process

- The concept of Travelers began during the lead plants' adoption of the ISTS.
 - If the lead plants identified a needed change to the ISTS, they would provide an ISTS markup and justification for the change.
 - If the NRC accepted the change, it could be included in the lead plant LARS.
- Revision 1 of the ISTS included all of the improvements identified by the lead plant group.
- The industry and NRC recognized that continued cooperation on the evaluation and adoption of changes into the ISTS was beneficial.
 - Facilitates consistent approach to TS corrections and improvements and allows use of generic justifications that are to support TS changes.

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The TSTF and Traveler Development

- The Technical Specification Task Force (TSTF) is the lead group for Traveler development:
 - Has representatives from each of the NSSS plant types.
 - Sponsored by the industry Owners Groups' (BWROG, PWROG, and APOG) with Excel Services as a non-voting technical coordinator.
- Travelers are developed by the Owners' Groups' licensing committees. Each utility has representatives on these committees.
 - Proposed improvements to the ISTS are evaluated to determine if the change should be pursued as a Traveler.
 - The technical justification for the change is developed, including discussion of any plant-specific differences, and the ISTS is marked up.
 - The draft Traveler is reviewed by the committee members prior to submittal and comments are resolved.

Traveler Approval

- The Traveler content includes a LAR-quality technical justification, all information required for a LAR , and a model application (LAR template).
 - Proposed Travelers are discussed with NRC at the quarterly NRC-TSTF meetings. If warranted, formal pre-submittal meetings are conducted.
 - The TSTF responds to all NRC requests for additional information until the Traveler is approved.
 - A model Safety Evaluation (SE) is prepared by NRC as part of Traveler approval.
- **THE GOAL:** The licensee writes a LAR based on the model application, provides the required verifications, any plant-specific information described in the model application, and the plant-specific TS markups.
 - The NRC reviews the LAR and writes the plant-specific SE using the model SE.

CLIIP vs. Non-CLIIP Travelers

- Regulatory Issue Summary (RIS) 2000-06 describes the Consolidated Line Item Improvement Process (CLIIP).
 - All TSTF Travelers submitted to the NRC have model applications and the NRC writes a model SE.
- The process has evolved since the RIS; not all Travelers are available under the CLIIP.
 - If a LAR can be reviewed by only the NRC's Technical Specification Branch, it is available under the CLIIP and the NRC works to issue the LAR approval within 6 months.
 - For all other LARs based on Travelers, the licensee still follows the model application and the NRC staff uses the model SE, but it is processed like a normal amendment using the NRC's normal completion metrics.

Conclusion

- The TSTF and the TSTF Traveler process, and its predecessors, have provided an efficient, generic method to improve Technical Specifications for over 20 years.
- The TSTF is very active as the industry's point of contact on Technical Specifications-related issues.
- The TSTF Traveler process continues to improve and respond to the changing regulatory environment.
- The TSTF Traveler process will continue to provide value to the industry and the NRC for the foreseeable future.
