

January 3, 2002

MEMORANDUM TO: Stuart A. Richards, Director
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Jack Cushing, Project Manager, Section 2
Project Directorate IV /RA/
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MEETING HELD ON DECEMBER 6 AND 7, 2001, WITH
THE COMBUSTION ENGINEERING OWNERS GROUP (CEOG)
REGARDING DEVELOPMENT OF A FLEXIBLE ALLOWED OUTAGE
TIME TOPICAL REPORT

On December 6 and 7, 2001, a public meeting was held in Marco Island, Florida, between the CEOG and the NRC staff. The list of attendees is attached. The slides are available in ADAMS under accession number ML013470432.

The purpose of the meeting was to discuss the CEOG's approach to developing a flexible technical specification (TS) allowed outage time (AOT). The concept behind the flexible AOT is to base the time the plant is in the TS action statement before requiring a plant shutdown to be determined by the risk associated with the existing plant configuration. The current AOTs are not based on the risk associated with plant configuration and may needlessly cause plant shutdowns.

Planned maintenance or equipment degradation requiring corrective maintenance may result in equipment being rendered inoperable. This results in entrance into the TS limiting condition for operation (LCO). The TS contains a time limit called an AOT or completion time that the plant is allowed to continue to operate with the equipment unavailable before being required to shutdown.

The proposed change to the TS is to continue to have the current AOT which would be called the frontstop AOT and to create a backstop AOT beyond which the plant would have to shut down even if the risk analysis justified continued operation. The licensee, through its configuration risk management program (CRMP), would evaluate the risk and could extend the AOT commensurate with the risk up to the backstop AOT.

The CEOG approach to this initiative is to demonstrate the feasibility by using a high risk worth system such as the high pressure safety injection (HPSI) system and performing a risk analysis to show that their CRMP can quantify and manage the risk to justify extending the AOT.

The staff and the CEOG discussed the attributes of a CRMP that can be used to justify the increased flexibility. There was also discussion on how to integrate a CRMP with the

Maintenance Rule. The CEOG with their HPSI submittal plans to demonstrate that their probable risk assessment tools can be used to calculate changes in plant risk associated with failures or degradations down to the component level. The staff stated that the quality of existing risk models at some plants may need to be upgraded if such models are to be used for assessing risk impacts associated with degradations at the component level.

The staff suggested that the CEOG should have the users (operators, maintenance planners) of this flexible AOT evaluate their proposed TS change.

The staff also asked them to use the Nuclear Energy Institute's (NEI) White Paper on License Amendment Requests as a format for their submittal. This will save the staff and the industry time in the license amendment process since the CEOG's submittal and the staff's safety evaluation (SE) will be closer to the license amendment submitted by a licensee.

The staff provided the CEOG with the following update on the risk-informed TS initiatives.

Risk Informed Technical Specifications Initiatives Status as of December 7, 2001

Initiative 1 - TS Actions End States Modifications

Status: The NRC staff's review of the industry topical reports supporting this Risk-Informed Technical Specifications Task Force (RITSTF) initiative is in progress. The CEOG topical report SE was issued on July 17, 2001. The boiling water reactor (BWR) topical report SE is in review and a request for additional information (RAI) was issued on July 30, 2001. The RITSTF has reviewed both the CE topical report SE and the BWR topical report RAI. The boiling water reactor owners group (BWROG) response to the RAI has been received and is under staff review. If the RAI response is acceptable, a BWR topical report SE is expected to be completed early in 2002. A proposed joint CEOG and BWR technical specification task force traveler (TSTF) will be submitted early in 2002.

Initiative 2 - TSTF-358, Missed Surveillance Requirements (SR), SR 3.0.3 Modifications

Status: On September 28, 2001, the NRC staff issued the *Federal Register* notice announcing the availability to licensees of the Consolidated Line Item Improvement Process (CLIIP) change on Risk-Informed Technical Specification (RITS) Initiative 2. Currently, six plants have requested the Initiative 2 CLIIP (Callaway, Fermi 2, Point Beach 1 and 2, and St. Lucie 1 and 2).

Initiative 3 - TSTF-359, Modification of Mode Restraint Requirements of LCO 3.0.4

Status: In response to the staff's RAIs and questions raised at the last meeting, the RITSTF has begun to rework TSTF-359 in order to gain consistency between the owners group (OG) submittals. The RITSTF has submitted a partial draft TSTF-359, Revision 6, for staff review and comment. It introduces consistency between the OG's tables of risk significant systems that require risk assessments, and it proposes LCO and Bases modifications. The staff has reviewed and accepted the RITSTF RAI responses. The RITSTF will submit revised analyses for new systems tables by the end of December 2001. The staff has provided verbal feedback

to the partial draft TSTF-359, Revision 6, and will soon provide written feedback. The RITSTF plans to submit a final TSTF-359, Revision 6, by January 15, 2001.

Initiative 4 - Risk-Informed AOTs, Use of a CRMP

Status: A risk assessment process for determining the appropriate AOT is being developed. A strawman proposal (pilot) involving multiple systems will be developed to gain a greater understanding of the process and to prove the risk assessment concept involved in Initiative 4. NEI is taking the lead in organizing a unified approach. The RITSTF presented a new preliminary description paper at the meeting on October 12, 2001. The proposal involves a combination of the current TS AOTs, a 10 CFR 50.65(a)(4) risk assessment to determine AOT extension feasibility, and AOT backstop limits. The staff will provide feedback on this paper by January 15, 2002. NEI is pursuing a presentation to be given to the NRC staff on the 10 CFR 50.65(a)(4) risk assessment process that is utilized extensively in the proposed risk management TS.

Initiative 5 - Relocation of Non-Safety SRs and Relocation of All SR Frequency Requirements Out of TS

Status: In September 2001, the staff provided RAIs to the RITSTF on the concept/white paper that they presented to the NRC at the prior meeting. The RITSTF will provide RAI responses and a revised white paper by December 31, 2001.

Initiative 6 - Modification of LCO 3.0.3 Actions and Completion Times

Status: A CEOG submittal was received on January 24, 2001, and it was reviewed by the staff. RAIs were issued on May 9, 2001. The RITSTF has submitted RAI responses, which are under review by the staff. A comprehensive TSTF, for all OG, is planned to be submitted in September 2002.

Initiative 7 - Non-TS Support System Impact on TS Operability Determinations

Status: A RITSTF concept/white paper was submitted in July to the NRC and the NRC provided feedback. The RITSTF will submit a TSTF early in 2002 to comprehensively address non-TS support system impact on TS operability determinations.

Initiative 8 - Remove/Relocate Non-Safety Systems and Non-Risk Significant Systems Out of Scope of TS

Status: This initiative will be pursued in the future after progress on the other initiatives provides the experience and confidence necessary to take this step.

Project No. 692

Attachment: Meeting Attendees

cc w/att: See next page

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DISTRIBUTION: See attached list

Meeting Notice: ML013170004

Package: ML013540380

ACCESSION NO.: ML013540360

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CEOG

Dated: January 3, 2002

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**ATTENDANCE LIST FOR MEETING BETWEEN
NRC AND THE CEOG
REGARDING THE DEVELOPMENT OF A FLEXIBLE ALLOWED OUTAGE TIME
TOPICAL REPORT
DECEMBER 6 AND 7, 2001**

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R. Weston

NRC

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J. Cushing