

December 13, 2004

MEMORANDUM TO: Robert Gramm, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Bo Pham, Project Manager, Section 2 **/RA/**
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MEETING HELD ON OCTOBER 28, 2004, WITH THE
BOILING WATER REACTORS OWNERS GROUP (BWROG) TO
DISCUSS PROPOSED TOPICAL REPORT (TR) ON MULTIPLE
SYSTEMS COMPLETION TIME (CT)/ALLOWED OUTAGE TIME (AOT)
EXTENSIONS (TAC NO. MC4934)

On October 28, 2004, the BWROG met with the U.S. Nuclear Regulatory Commission (NRC) staff to discuss its plans to develop and submit TRs with CT/AOT extensions for technical specifications (TSs) on multiple systems categorized under the BWROG's initiatives 4a and 6. The NRC staff and BWROG had previously engaged in earlier discussions on this topic via the Risk-Informed Technical Specification Task Force (RITSTF).

The meeting began with the BWROG giving a presentation on its intentions in defining the scope, background, and approach of the future topical report (TR) submittals, as well as the potential time line and schedule for submittal. The BWROG proposal involves two TRs. The first is an Initiative 4a proposal to extend completion times for one Standby Gas Treatment (SGT) subsystem inoperable and for one Main Control Room Environmental Control (MCREC) subsystem inoperable. The second TR is an Initiative 6 proposal to extend entry times for entry into LCO 3.0.3 (exigent plant shutdowns) for Reactor Coolant System Leakage Detection Instrumentation, SGT system, MCREC system, and Main Control Room Air Conditioning system. While questions may exist over the exact completion times and the associated justifications, in general, these specific proposed submittals are acceptable, since they are limited in nature and are subsets of previously approved changes. The staff, however, is concerned with the risk-informed approaches that intended to extend CTs/AOTs for multiple TS systems. The staff had numerous questions and comments related to this general concern.

The NRC expressed concern over risk-informed evaluations for systems not specifically modeled for probabilistic reliability assessment (PRA) and for using non-CDF(core damage frequency) and non-LERF (large early release frequency) metrics. In addition, the NRC staff provided hand-outs to meeting participants outlining the following points regarding submittals for CT/AOT extension requests:

- The requests must completely follow all aspects and requirements of Regulatory Guide (RG) 1.174 and 1.77, including a thorough presentation of Tier 2 requirements, and a commitment to an adequate Tier 3 configuration risk management process, which for multiple system requests would be similar to the Risk Management Technical Specification (RMTS) Guidance provided for RMTS Initiative 4b, Risk-Informed Completion Times. The level and scope of PRA must be addressed in the submittals.
- The requests should include a thorough risk evaluation that addresses all requested changes, a full justification and explanation of the acceptability of and need for the changes.
- The submittal should be coordinated/submitted through the Risk Informed Technical Specifications Task Force (RITSTF), or equivalent owners group task force, for coordination, assignment of priority, and industry approval. In the case of the subject TRs, the BWROG indicated that it will reflect coordination effort in its submittal cover letters.

The NRC staff indicated that any CT/AOT request not meeting these requirements will most likely be rejected, indicating that the need to evaluate the status of a plant with an increasing number of individual risk-informed CT/AOT extensions that has not proposed an integrated, full scope Tier 3, could be resource intensive and would be a low priority compared to plants implementing a full scope Tier 3 and associated processes.

In addition, the NRC staff expressed concern that licensee extension requests for multiple system CT/AOT could potentially enable a licensee, operating with several structures, systems, and components (SSCs) inoperable, to exceed acceptable risk levels. The staff does not believe that, with multiple CT/AOT extensions, all configuration risk management programs used by licensees are adequate to control plant operation with multiple inoperable SSCs.

The Nuclear Energy Institute (NEI) representative made preliminary comments on the NRC staff's outlined approach, specifically in NEI's role in coordinating all licensee/owners group submittals, but all parties agreed to take time to digest the staff's discussion points and revisit it during the next RITSTF meeting.

At the meeting's conclusion, the NRC staff thanked the BWROG for its participation. The BWROG indicated that it would inform the NRC staff of any changes in the TR's schedule for submittal. Additional discussions regarding CT/AOT extension submittals and risk-informed approaches is planned for the next RITSTF meeting. An attendance list is provided as Attachment 1. The slide presentation is attached as Attachment 2 and is available in ADAMS under accession no. ML043140156.

Project No. 691

Attachments: As stated

cc w/atts: See next page

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1. The requests should include a thorough risk evaluation that addresses all requested changes, a full justification and explanation of the acceptability of and need for the changes.
2. The submittal should be coordinated/submitted through the Risk Informed Technical Specifications Task Force (RITSTF), or equivalent owners group task force, for coordination, assignment of priority, and industry approval. In the case of the subject TRs, the BWROG indicated that it will reflect coordination effort in its submittal cover letters.

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NRC-001

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DATE	11/22/04	11/22/04	11/23/04

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MEETING WITH THE BOILING WATER REACTORS OWNERS GROUP (BWROG)

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