

January 14, 2005

Mr. Biff Bradley
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

SUBJECT: DECEMBER 15, 2004: SUMMARY OF MEETING WITH THE NUCLEAR ENERGY INSTITUTE, ELECTRIC POWER RESEARCH INSTITUTE AND INDUSTRY REPRESENTATIVES TO DISCUSS REQUESTS FOR ADDITIONAL INFORMATION ON RISK MANAGEMENT TECHNICAL SPECIFICATIONS GUIDELINES FOR INITIATIVE 4b, CE INITIATIVE 4b PILOT PROPOSAL TSTF-424, AND SOUTH TEXAS PROJECT (STP) INITIATIVE 4b PILOT PROPOSAL

Dear Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the Industry representatives on RAIs on Risk Management Technical Specifications Guidelines for Initiative 4b, CE Initiative 4b pilot proposal TSTF-424, and STP Initiative 4b pilot proposal. The meeting was held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on December 15, 2004. Significant progress was made in addressing staff RAIs.

Sincerely,

/RA/

T. R. Tjader, Senior Reactor Engineer
Technical Specifications Section
Reactor Operations Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

Enclosures:

1. Meeting Summary
2. Attendance List
3. RMTS Guidelines
4. RMTS Guidelines RAIs & Responses
5. STP RMTS Initiative 4b Pilot Proposal RAIs & Responses
6. CE TSTF-424 RMTS Initiative 4b Pilot Proposal RAIs & Responses

cc w/encl: See attached page

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ADAMS PACKAGE NUMBER: ML050120117, LETTER THROUGH ENCLOSURE 2: ML050120120
ENCLOSURE 3: ML050120351, ENCLOSURE 4: ML050130181, ENCLOSURE 5: ML050130181,
ENCLOSURE 6: ML050130182

DOCUMENT NAME: E:\Filenet\ML050120120.wpd

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Mr. Phil Tarpinian
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SERCH/Bechtel

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General Electric Nuclear Energy

Mr. Michael S. Kitlan, Jr.
Duke Energy Corporation

Mr. Noel Clarkson
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Mr. Donald Hoffman
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Mr. J. E. Rhoads
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Ms. Deann Raleigh
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Mr. Frank Rahn
EPRI

Mr. Sam Chien
SCE

Mr. Gary Chung
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Mr. Courtney Smyth
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Mr. Jerry Andre
Westinghouse Electric Company

Mr. David Helher
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Mr. Eugene Kelly
Exelon

Mr. James Liming
ABSG

Mr. Stanley Levinson
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SUMMARY OF THE DECEMBER 15, 2004 MEETING WITH NUCLEAR ENERGY INSTITUTE
(NEI), ELECTRIC POWER RESEARCH INSTITUTE (EPRI) AND INDUSTRY
REPRESENTATIVES ON REQUESTS FOR ADDITIONAL INFORMATION (RAIs) ON RISK
MANAGEMENT TECHNICAL SPECIFICATIONS INITIATIVE 4b SUBMITTALS

The NRC staff met with Industry representatives on December 15, 2004, from 9:00 a.m. to 5:00 p.m. The meeting attendees are listed in Enclosure 2.

The meeting consisted of discussions of: the Risk Management Technical Specifications (RMTS) Guidelines for RMTS Initiative 4b, Risk-Informed Completion Times (Enclosure 3), staff RAIs and industry responses (Enclosure 4) on the RMTS Guidelines; the staff RAIs and industry responses on South Texas Pilot (STP) RMTS Initiative 4b Pilot Proposal (Enclosure 5), and the staff RAIs and industry responses on CE TSTF-424 RMTS Initiative 4b Pilot Proposal (Enclosure 6). An overview of the discussions is provided. In general, the RAI responses are good and the RMTS Guidelines are better. While significant progress was made, some work remains. A brief sense of the RAI discussion follows.

1. PRA Quality and Configuration Risk Management Tools

- PRA Quality (scope, technical adequacy, level of detail) is not adequately defined. The RMTS Guidelines state that it and RG 1.200 will address all PRA scope and capability requirements; minimum PRA attributes are not defined therein. The implication is that any level PRA is acceptable with a corresponding acceptable qualitative bounding assessment. The RMTS Guidance must explain that a plant's ability to apply RMTS Initiative 4b must be commensurate with its PRA Quality.
- Licensee PRA Quality will need to be assessed for adequacy to implement the RMTS Initiative 4b process, including the adequacy of the PRA models to: calculate LERF increases, model degradation, model external events, and model various plant configurations.
- Licensee QA processes with respect to PRA maintenance and CRMP tools will need to be assessed.
- Uncertainties in the CRM tools and processes need to be evaluated and considered.

2. Emergent Conditions

- The time to conduct risk assessments and account for potential common cause failures after an emergent condition is now proposed to be 12 hours. "Worst case" examples are to be provided to demonstrate that 12 hours is appropriate; bounding for one additional TS inoperability.
- When within a TS action statement and its associated completion time (whether it is the front stop CT or a calculated RICT), subsequent risk assessments for emergent conditions shall be conducted with a purpose to confirm or establish an acceptable RICT. The RMTS Guidelines do not reflect this requirement.

- The industry intends to apply RMTS Initiative 4b to emergent plants conditions that will include complete loss of system function; Initiative 4b will subsume Initiative 6 on LCO 3.0.3 entry. The industry needs to address the nexus between Initiative 4b and Initiative 6.

3. **Examples**

- The pilot plant and NRC staffs will meet to select a suitable set of plant configurations to apply the proposed Initiative 4b process, in order to appropriately evaluate the licensee's PRA and Configuration Risk Management process.

4. **Documentation**

- The documentation outlined in the CE response #47, along with some additional information such as ICDP, ILERP, and associated justifications (e.g., for compensatory measures), are appropriate for determining a RICT. This detail needs to be incorporated into the RMTS Guidance document.

5. **RMTS Guidelines**

- RAIs on the updated RMTS Guidelines will be prepared by the staff and sent to the NEI RITSTF by the end of April 2005.
- An LCO exit strategy/shutdown must be addressed.
- The RMTS Guidance must be consistent with the processes described in the STP and CE pilot plant proposals.
- The RMTS Guidance must address: credit for contingency actions and compensatory measures, the treatment of potential common cause failures for emergent conditions, the acceptability of qualitative or bounding arguments used in the risk assessments; the tracking of accumulated risks, and the interface with NRC's reactor oversight program.
- The information and level of detail contained in the RMTS Guidelines will determine whether Initiative 4b will be a candidate for the Consolidated Line Item Improvement Process (CLIIP), and to a greater degree, whether exportable guidance will be provided to the follow-on plants to the pilot plants. The RMTS Guidelines needs to provide exportable guidance that is applicable, reliable and repeatable in other follow-on plants.

The NRC staff looks forward to receiving updated official responses to the RAIs, along with updated RMTS Guidelines and pilot plant proposals.

The following meetings are planned:

January 18, 2005: STP RMTS I4b Pilot meeting in NRC Region IV Offices at Dallas, TX

January 19, 2005: STP RMTS I4b Pilot meeting at Site

January 28, 2005: RITSTF Meeting at NRC HQ

January 12-23, 2005: CRM Forum at the FPL Juno Beach FL facility

NRC/INDUSTRY MEETING TO DISCUSS REQUESTS FOR ADDITIONAL INFORMATION ON
RISK MANAGEMENT TECHNICAL SPECIFICATIONS INITIATIVE 4b PROPOSALS
ATTENDANCE LIST
DECEMBER 15, 2004

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
DON HOFFMAN	TSTF/EXCEL SERVICES
JOHN GAERTNER	EPRI
WAYNE HARRISON	STP NOC
SCOTT HEAD	STP NOC
RICK GRANTOM	STP NOC
DREW RICHARDS	STP NOC
ALAN HACKEROTT	OPPD
JIM ANDRACHEK	WESTINGHOUSE/WOG
JACK STRINGFELLOW	SOUTHERN NUCLEAR OPERATING COMPANY
WEI HE	PSEG
GABE SALAMON	NMC
YU SHEN	NMC
RICK HILL	GE
RAY SCHNEIDER	WESTINGHOUSE PSA
JAMES LIMING	ABSG
TOM BOYCE	NRC/NRR/DIPM/IROB/TSS
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
NICK SALTOS	NRC/NRR/DSSA/SPSB
MARTY STUTZKE	NRC/NRR/DSSA/SPSB
CLIFF DOUTT	NRC/NRR/DSSA/SPSB
MICHELLE LAUR	NRC/NRR/DSSA/SPSB
MILLARD WOHL	NRC/NRR/DSSA/SPSB
ANDREW HOWE	NRC/NRR/DSSA/SPSB
STEPHEN ALEXANDER	NRC/NRR/DIPM/IPSB
Y. GENE HSII	NRC/NRR/DSSA/SRXB
GEORGE MORRIS	NRC/NRR/DE/EEIB