

October 3, 2005

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

SUBJECT: SEPTEMBER 21, 2005: SUMMARY OF MEETING WITH THE NUCLEAR
ENERGY INSTITUTE, ELECTRIC POWER RESEARCH INSTITUTE AND
INDUSTRY REPRESENTATIVES ON RISK MANAGEMENT TECHNICAL
SPECIFICATIONS GUIDELINES FOR INITIATIVE 4b

Dear Mr. Bradley:

The purpose of this letter is to transmit the summary of a meeting with the Industry
representatives on Risk Management Technical Specifications Guidelines. The meeting was
held at the U.S. Nuclear Regulatory Commission offices in Rockville, Maryland, on
September 21, 2005.

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. Agenda
4. Risk Management Guidelines (RMG) Requests for Additional
Information (RAIs)
5. RMG Comments
6. RMTS Guidelines

cc w/encl: See attached page

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ADAMS ACCESSION NUMBER: PACKAGE: ML052730142, LETTER, ML052730152,
ENCLOSURE 4: ML052730161, ENCLOSURE 5: ML052730165,
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Mr. Biff Bradley

cc via e-mail:

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Nuclear Energy Institute

Mr. Biff Bradley
Nuclear Energy Institute

Mr. Mike Schoppman
Nuclear Energy Institute

Mr. Alan Hackerott, Chairman
Omaha Public Power District

Mr. Jim Kenny
Pennsylvania Power & Light Company

Mr. James Andrachek
Westinghouse Electric Company

Mr. Jack Stringfellow
Southern Nuclear Operating Company

Mr. Ray Schneider
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Mr. John Gaertner
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Mr. Frank Rahn
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Mr. Wayne Harrison
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Mr. Rick Grantom
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Ms. Nancy Chapman
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Mr. Michael S. Kitlan, Jr.
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Mr. Noel Clarkson
Duke Energy Corporation

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Mr. Ted Book
Framatech-ANP

Mr. R. J. Schomaker
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Mr. J. E. Rhoads
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Ms. Deann Raleigh
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Mr. Ken Canavan
DS&S

Mr. Steven Dolly
Platts

Mr. Gabe Salamon
PSEG Nuclear

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
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SUMMARY OF THE SEPTEMBER 21, 2005 MEETING WITH NUCLEAR ENERGY INSTITUTE
(NEI), ELECTRIC POWER RESEARCH INSTITUTE (EPRI) AND INDUSTRY
REPRESENTATIVES ON RISK MANAGEMENT TECHNICAL SPECIFICATIONS GUIDELINES
FOR INITIATIVE 4b

The NRC staff met with Industry representatives on September 21, 2005, from 9:00 a.m. to 12:30 p.m. The meeting attendees are listed in Enclosure 2.

The agenda (Enclosure 3) consisted of major discussion topics/requests for additional information (RAIs) (Enclosure 4) and related comments (Enclosure 5) to the latest version of the Industry's proposed Risk Management Technical Specifications (RMTS) Guidelines (Enclosure 6) for RMTS Initiative 4b, Risk-Informed Completion Times.

Major topics of discussion and areas needing enhancement in the RMTS Guidance (RMG) document are:

- The RMG should be restructured to provide requirements that can be invoked by the Administrative Controls Section of the technical specifications (TS). To the extent possible the RMG should be procedure like and utilize imperative directives such as "shall." Reducing redundancy, maintaining consistency and simplifying the RMG should be a goal in restructuring. It is not deemed necessary to make the RMG document a Regulatory Guide since it will be referenced explicitly in the TS.
- It should be clear that the cause of an ICDP increase above 10^{-6} and an approach to the limit of 10^{-5} is due to emergent conditions and not a routine planned increase. Guidance is needed on the accumulation of risk, to avoid exceeding the 10^{-5} limit. Guidance should be included on the periodic evaluation of the accumulation of risk, and the consideration of actions to improve the implementation of RICTs. A member of the staff proposed that a possible means controlling aggregate risk would be to add a goal to the Administrative Controls Section of the TS to keep the accumulation of risk as low as reasonably achievable.
- The discussion of Common Cause Failure (CCF) needs to be enhanced by including specific actions, considerations and examples.
- The discussion of TS Operability versus PRA functionality needs to be enhanced by including specific considerations and examples.
- A thorough discussion is needed of the application of a RICT, with examples provided of various scenarios; how the actions associated with a RICT are entered and exited.
- It must be clear that every use of a RICT requires documentation of the associated risk assessment.
- The RMG should thoroughly discuss the use of qualitative and bounding assessments; e.g., how risk concerns can be qualitatively ruled out, and how quantitatively risk concerns can be bounded.

Enclosure 1

- Consideration of applying a Safety Function Determination Program test, such as that provided in the Standard TS, to LCO 3.0.3 entries to determine if it is acceptable to utilize a RICT; it is not acceptable to use a RICT for an LCO 3.0.3 entry required by a bonafide loss-of-function. It is recognized that RICTs can be used with the actions to restore equipment to Operable status that have been created through RMTS Initiative 6.
- The processes described in the STP and CE pilot plant proposals must be consistent with the RMG.

The intent is to meet again soon after a revised RMG document is developed and provided for review.

NRC/INDUSTRY MEETING ON THE
RISK MANAGEMENT GUIDELINES FOR RMTS INITIATIVE 4b
ATTENDANCE LIST
SEPTEMBER 21, 2005

<u>NAME</u>	<u>AFFILIATION</u>
BIFF BRADLEY	NUCLEAR ENERGY INSTITUTE
JOHN GAERTNER	EPRI
RICK GRANTOM	STP NOC
WAYNE HARRISON	STP NOC
BILL STILLWELL	STP NOC
DREW RICHARDS	STP NOC
ALAN HACKEROTT	OPPD
RAY SCHNEIDER	WESTINGHOUSE PSA
JAMES LIMING	ABSG
PAT HILAND	NRC/NRR/DIPM/IROB
TOM BOYCE	NRC/NRR/DIPM/IROB/TSS
BOB TJADER	NRC/NRR/DIPM/IROB/TSS
DAVID ROTH	NRC/NRR/DIPM/IROB/TSS
SARA BERNAL	NRC/NRR/DIPM/IROB/TSS
MARK REINHART	NRC/NRR/DSSA/SPSB
ANDREW HOWE	NRC/NRR/DSSA/SPSB
JIM VAIL	NRC/NRR/DSSA/SPSB
NANCY SALGADO	NRC/NRR/DSSA/SPSB
DAVID SHUM	NRC/NRR/DSSA/SPLB
STEPHEN ALEXANDER	NRC/NRR/DIPM/IPSB
HUKAM GARG	NRC/NRR/DE/EEIB
MIKE SNODDERLY	NRC/ACRS

AGENDA
RISK MANAGEMENT TECHNICAL SPECIFICATIONS
INITIATIVE 4b, RISK-INFORMED COMPLETION TIMES
RISK MANAGEMENT GUIDANCE DOCUMENT

C Risk Management Guidance (RMG) Document Comment Overview

B Improving: content largely there, needs change in emphasis to support Tech Specs

B Re-structure to support Tech Spec Requirements (e.g., procedure-like)

- State “shall” requirements, followed by implementation guidance

B Larger Scope Deficiencies

- RICT Threshold of 10^{-5} ICDP seems high (see RAI comments 43, 13)

Implications for control of aggregate risk (e.g., ALARA concept)

- Tech Spec Operability vs PRA Functionality, (see RAI comment 19)

needs to be addressed more fully in Guidance

- CCF needs to be addressed more fully in Guidance (see RAI comment 1)

- Use of Qualitative and Bounding Assessments, used to support RICTs,

needs to be addressed more fully in Guidance (see RAI comment 20)

- Simplify RMG, (see RAI comment 42)

B Detailed Deficiencies (see other RAI comments); a few are mentioned below:

- Correct Flow Chart

- Every use of a RICT requires documentation

- Correct means of calculating RICT (see RAI comment 46)

- Address PRA/CRMP maintenance/updates (see RAI comment 47)

- Consistency needed: for example, RICT & TS 3.0.3 applications, uncertainty

C Pilots shall be consistent with RMG

C Schedule/Process

C Closing Comments

Enclosure 3