

August 7, 2006

MEMORANDUM TO: Patrick L. Hiland, Deputy Director
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Timothy J. Kobetz, Chief */RA/*
Technical Specifications Branch
Division of Inspection & Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: COMMUNICATION PLAN: RISK INFORMED FLEXIBLE
COMPLETION TIMES AND RISK INFORMED SURVEILLANCE
FREQUENCY INITIATIVES

The enclosed plan describes the methods and tools for communicating with internal stakeholders concerning the initiatives for risk informed flexible completion times and relocation of surveillance frequency requirements out of the technical specifications. This plan will facilitate communication within the agency to enable the staff to provide timely, consistent, and understandable information to our internal stakeholders. It will also provide a feedback mechanism for stakeholders to help ensure the agency is ready for implementation.

There is a need to communicate this project to NRC staff both in headquarters and in the regions. However, the effort does not rise to the level of significance that requires a formal communication plan per NRR Office instruction COM-201 "Public Outreach and Communications Plans." Therefore, this plan emulates the expectations documented in the Office Instruction but approval has been lowered to a more appropriate level.

The Technical Specifications Branch has coordinated with the Performance Assessment Branch, Reactor Inspection Branch and the Division of Risk Assessment, PRA Licensing Branch in preparing this document.

CONTACT: Theodore Tjader, DIRS/ITSB
301-415-1187

Enclosures: 1. Communication Plan
2. Communication Timeline
3. RMTS I5b and I5b Summary

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COMMUNICATION PLAN
RISK INFORMED FLEXIBLE COMPLETION TIMES AND
RISK INFORMED SURVEILLANCE FREQUENCY INITIATIVES

INTRODUCTION

This communication plan covers topics associated with risk informing technical specifications. There are eight initiatives for fundamental improvements to the standard technical specifications being developed by the industry and the Nuclear Regulatory Commission (NRC). This communication plan covers the most significant initiatives: flexible completion times and relocation of surveillance frequency requirements out of the technical specifications. The plan describes the methods and tools that the staff of the NRC will use to communicate effectively with internal stakeholders concerning these initiatives. External industry stakeholders have been working through Nuclear Energy Institute (NEI) and with the NRC staff for several years. Licensee adoption of the applicable license amendments is voluntary, thus a communication plan is not necessary for external industry stakeholders.

GOALS

The objective of this communication plan is to effectively communicate with internal stakeholders. Effective communications prior to granting license amendments will achieve the following goals:

1. Ensure no significant technical issues will arise after the license amendments are issued.
2. Ensure necessary procedure changes have been made prior to the implementation.
3. Ensure inspectors at plants with the new technical specifications receive necessary training before implementation.
4. Ensure regional inspectors are ready to accept responsibility to ensure compliance to the new technical specifications.
5. Ensure the NRC staff has clear direction on how to treat potential findings relative to Enforcement and Reactor Oversight Process (ROP).

BACKGROUND

Since the mid-1980s, the NRC has been reviewing and granting improvements to technical specifications that are based, at least in part, on probabilistic risk assessment (PRA). The Commission reiterated that it expects licensees to use any plant-specific PRA or risk survey in preparing technical specifications for NRC approval when it issued the revision to 10 CFR 50.36, "Technical Specifications," in July 1995. In August 1995, the NRC adopted a final policy statement on the use of PRA methods in nuclear regulatory activities that encourages greater use of PRA to improve safety decisionmaking and regulatory efficiency.

Since that time, the industry and the NRC have been pursuing increased use of PRA in developing improvements to technical specifications.

Guidance documents have been prepared to assist in requesting risk-informed completion time (also called allowed outage time) and surveillance test interval extensions (Regulatory Guide 1.177 and Standard Review Plan Chapter 16.1 [NUREG-0800]). Use of this guidance has resulted in risk-informed amendments at numerous individual plants and in owners groups continuing to submit topical reports to support additional applications for Standard Technical Specification changes.

This project defines program requirements to allow stations to use PRA to determine the appropriate Technical Specification Completion Time in accordance with an approved methodology. The two initiatives that are the subject of this communication plan are part of an overall effort to risk inform the technical specifications (TS). The two initiatives are:

Initiative 4b, Risk-Informed Completion Times: The overall objective of this initiative is to modify the TS to reflect a configuration risk management approach that is more consistent with the maintenance rule (a)(4) approach. The proposal involves a combination of the current TS completion times (CT), a quantified (a)(4) based risk assessment to determine CT extension feasibility, and CT backstop limits. The CT backstop limits ensure that low-risk safety functions are not permitted to be inoperable for an indefinite period of time. This initiative would permit, contingent upon the results of a plant configuration risk assessment, temporary revision of the existing CT within an LCO using a quantitative implementation of 50.65(a)(4).

Initiative 5b, Surveillance Frequency Control Program: The goal of this initiative is to develop a risk-informed process that would establish surveillance intervals based on risk insights, equipment availability and reliability factors, performance history, etc., to determine an "optimum" surveillance requirement frequency. Upon development and approval of this process, the intent is to retain the existing surveillance requirements in the technical specifications, but to remove the equipment-specific surveillance test intervals to a licensee controlled document. The surveillance test intervals would be controlled through the NRC approved process that is defined in the Administrative Controls Section of TS, in the Surveillance Frequency Control Program.

KEY MESSAGES

The key messages for stakeholders are as follows:

6. Educate headquarters and regional staff on the two initiatives.
7. Communicate the timeline for the initiative implementation.
8. Communicate to the staff the tools and contacts available to get additional information.

9. Communicate to the staff how to provide feedback to the project team for questions and issues. Responses to the questions will help ensure that the staff is ready for implementation of the two initiatives.

AUDIENCE

Site Resident and Regional Inspectors and their supervision
Office of Nuclear Reactor Regulation staff and supervision
Office of Enforcement staff and supervision

ACTION PLAN

The focus of the activities in this Communication Plan is to deliver key messages to internal stakeholders and provide a feedback mechanism for the stakeholders. The Communication Timeline is provided in Enclosure 1.

COMMUNICATION TEAM

<u>Name</u>	<u>Telephone</u>	<u>Role</u>
Bob Tjader, ITSB	301-415-1187	Communications Team Leader and Project Manager
Andrew Howe, APL	301-415-3078	PRA Communications
R Jasinski, NRR	301-415-1542	Technical Communications Assistant
F Tobler, IRIB	301-415-8473	ROP Call and Inspection Newsletter
Rene Pedersen	310-415-2742	OE Manager

COMMUNICATION TOOLS

This Communication Plan and associated information will be provided to NRC management and staff for communication with internal stakeholders.

The communication team will use the following tools to communicate with stakeholders:

<u>Tool</u>	<u>Target Audience</u>
NRC web site for Risk Managed Technical Specifications	All
Bi-Monthly Inspector Newsletters	Region Inspectors
Region Inspector Counterpart Meetings	Region Inspectors and Supervision
Issuing key documents for formal comments to regions	Region Inspectors

<u>Tool</u>	<u>Target Audience</u>
ROP Bi-weekly Friday Call	Region Supervision
"Have I Got News For You"	NRR Staff
IMC 1245 Training Working Group	Region Inspectors
Briefings to the Leadership Team, Risk Management Team and ACRS	NRC and NRR Leadership

The use of these tools is more fully described in the Communications Timeline in Enclosure 1.

The Communication Team will prepare and maintain a set of Questions and Answers (Q&As) for use in communicating with stakeholders. The Q&As will be either posted to the web site or updated in this communication plan, or both. The current list of Q&As are provided in Enclosure 2.

EVALUATION AND MONITORING

The members of the Communication Team will monitor correspondence regarding this issue to ensure consistency with key messages or to determine if further information is needed. Built into the timeline is a polling of organizations that are responsible for implementing some portion of the risk-managed technical specification initiative. The purpose of the poll is to ascertain the staff readiness to assume responsibility for the changes and simultaneously demonstrate the effectiveness of this communication plan. The details of the poll questionnaire will be developed prior to delivery in accordance with the timeline. The communication team will assess the degree of success that the goals and key messages had upon the target stakeholder audience. The Communication Plan will be revised as necessary pending the outcome of the poll. An Evaluation of Success will be provided to NRR's Communications TA.

UPDATES AND REVISIONS

If major revisions are necessary to this Communication Plan, the Communication Team Leader will ensure that a revision is made. Updates to the Q&As will be made as determined by the Communications Team Leader. These updates will not constitute a revision to this plan.

FINAL CLOSE-OUT

The Communications Team Lead will prepare a brief close-out statement about specific challenges and successes of the plan including any lessons learned. This will be briefed in one of the Risk Management Team or Leadership Team communications. This briefing is currently scheduled late in the year after the pilot license amendments have been issued.

**Communication Timeline For
Risk Informed Flexible Completion Times And
Risk Informed Surveillance Frequency Initiatives**

Communication Activity	Responsible Organization	Date Planned	Date Completed
February			
ROP Friday Call: communicate project.	ITSB	2/17/06	2/17/06
Engage Inspector Training Working Group on Training Needs	IPAB	2/15/06	2/15/06
March			
Solicit Inspector Feedback on Project Documents	ITSB	3/1/06	3/1/06
Brief Risk Management Team (RMT) or Leadership Team (LT).	ITSB	By end of month.	3/29/06
April			
Brief ACRS.	ITSB	By end of month.	4/28/06
Issue two draft inspection TIs to regions for comment and buy-in.	ITSB/IRIB	By end of month	4/14/06
ROP Friday Call: communicate project.	ITSB	By end of month.	4/28/06
May			
Publish article in "Inspector Newsletter" on project to complement CP meeting information, and to provide contacts and feedback tools.	ITSB/IRIB	By end of month.	5/31/06

Communication Activity	Responsible Organization	Date Planned	Date Completed
June			
Update Web site information	ITSB	By end of month.	6/30/060
ROP Friday Call: communicate the project and readiness to implement.	ITSB	By end of month.	Complete
Conduct Pilot Site Visit to STP	ITSB/NRR	By end of July.	Complete
August			
Brief RMT and/or LT on project status and readiness for implementation.	ITSB	By end of month.	Complete
Publish an article in "Inspector Newsletter" on the project.	ITSB/IRIB	By end of month.	
ROP Friday Call: communicate the project.	ITSB	By end of month.	
"Have I Got News For You"	ITSB/NRR	By end of month.	
Poll supporting branch chiefs in writing on readiness to accept responsibility to implement new license amendments. (RI-IV, IRIB, IPAB, OE....) This is also a measure of communication plan effectiveness.	ITSB/NRR	By end of month.	
Update Web site information	ITSB	By end of month.	
ROP Friday Call: communicate the project.	ITSB	By end of month.	
Inspector Training Working Group to define new training requirements and communicate to inspectors	ITSB/NRR	By end of month.	

Communication Activity	Responsible Organization	Date Planned	Date Completed
September			
ROP Friday Call: communicate the project.	ITSB	By end of month.	
Publish article in "Inspector Newsletter" on the project.	ITSB/IRIB	By end of month.	
Attend Counterpart meetings in Regions I, II, III, IV and provide project: purpose, status, who to contact for feedback and information.	ITSB	When scheduled	
"Have I Got News For You"	ITSB	By end of month.	
Conduct Pilot Site Visits to FCS	ITSB/NRR	By end of month	
Limerick I5bYLA issued (Pilot Plant)	ITSB/NRR	By end of month	
October			
Update Web site information	ITSB	By end of month.	
Inspectors at pilot plants have completed new training requirements.	ITSB/NRR	By end of month.	
November			
Update Web site information	ITSB	By end of month.	
Brief LT or RMT on project implementation and Communication Plan Close-out.	ITSB	By end of month.	
Publish article in "Inspector Newsletter" on the project if needed.	ITSB/IRIB	By end of month.	

Communication Activity	Responsible Organization	Date Planned	Date Completed
December			
STP & FCS I4b Pilot Plant LAs issued	ITSB	By end of month.	

Risk Management Technical Specifications
Initiative 4b, Risk-Informed Completion Times
Initiative 5b, Surveillance Frequency Determination Program

Consistent with the Commission's policy statements on technical specifications (TS) and the use of PRA, the staff and the industry are developing risk-informed improvements to TS. These improvements are intended to maintain or improve safety while reducing unnecessary burden, and to bring TS into congruence with the Commission's other risk-informed regulatory requirements, in particular risk management requirements of 10 CFR 50.65(a)(4). The term "risk management technical specifications" is used to emphasize the goal of constructing TS that reinforce the pro-active management of the total risk presented by the plant configuration and actions that may be needed to respond to emergent conditions.

TS have taken advantage of risk technology as experience and capability have increased. Since the mid-1980's, the NRC has been reviewing and granting improvements to TS that are based, at least in part, on probabilistic risk assessment (PRA) insights. In its final policy statement on TS improvements of July 22, 1993, the Commission stated that it expects that licensees will utilize any plant specific PRA or risk survey in preparing their TS related submittals. The Commission reiterated this point when it issued the revision to 10 CFR 50.36, "Technical Specifications," in July 1995. In August 1995, the NRC adopted a final policy statement on the use of PRA methods in nuclear regulatory activities that encourage greater use of PRA to improve safety decision making and regulatory efficiency. Since that time, the industry and the NRC have been pursuing increased use of PRA in developing improvements to TS.

Two of the more significant initiatives proposed for fundamental improvements to the TS are Initiative 4b, Risk-Informed Completion Times, and Initiative 5b, Surveillance Frequency Determination Program. These initiatives will involve a change in TS implementation by licensees and inspectors. It is important that the inspectors understand and become involved in the development of these risk-informed TS changes.

Initiative 4b, Risk-Informed Completion Times: Current TS contain equipment-specific outage times; known as TS completion times (CTs) and also referred to as allowed outage times (AOTs). The TS contain limiting conditions for operation (LCO) action statements and associated CTs (e.g., if the diesel generator is inoperable, restore within 7 days; if not restored, take actions to proceed to plant shutdown within 24 hours). Current TS address systems independently, and do not generally account for the combined risk impact of multiple concurrent equipment out of service conditions. The maintenance rule configuration risk assessment requirement was added to address this consideration, but does not obviate compliance with current TS requirements. These current TS requirements may present inconsistencies with the maintenance rule requirements, and may require plant shutdown, or other actions, that are not the most risk-effective actions given the specific plant configuration. The overall objective of this initiative is to modify the TS to reflect a configuration risk management approach that is more consistent with the maintenance rule (a)(4) approach. The proposal involves a combination of the current TS CTs, a quantified (a)(4) based risk assessment to determine CT extension feasibility, and CT backstop limits. The CT backstop limits ensure that low risk safety functions are not permitted to be inoperable for an indefinite

period of time. This initiative would permit, contingent upon the results of a plant configuration risk assessment, temporary revision of the existing CT within an LCO using a quantitative implementation of 50.65(a)(4). The methodology document describing the RICT determination process, and the associated requirements will be referenced in the Administrative Controls Section of TS.

Initiative 5b, SR frequency determination program in TS: Current technical specifications provide specific surveillance requirements and surveillance test intervals. Compliance with these requirements are necessary to retain operability of the equipment, and avoid entrance into action requirements. The surveillance requirements address function of the primary safety systems as well as instrumentation and control logic, etc. The goal of this initiative is to develop a risk-informed process that would establish surveillance intervals based on risk insights, equipment availability and reliability factors, performance history, etc., to determine an “optimum” SR frequency. Upon development and approval of this process, the intent is to retain the existing surveillance requirements in the technical specifications, but to remove the equipment-specific surveillance test intervals. Test intervals would be controlled through the NRC approved process that is defined in the Administrative Controls Section of TS, and contained in a licensee controlled document.