

July 25, 2006

MEMORANDUM TO: Timothy J. Kobetz, Chief
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Carl S. Schulten, Senior Reactor Engineer **/RA/**
Technical Specifications Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE JULY 11, 2006 PUBLIC MEETING WITH
THE NUCLEAR ENERGY INSTITUTE ON TECHNICAL
SPECIFICATIONS REQUIREMENTS FOR INSTRUMENT
SETTINGS DURING TESTING

The purpose of this memorandum is to issue the meeting summary for the notice of a Category 1 public meeting (Enclosure 1) held at the NRC White Flint Offices in Rockville, on July 11, 2006 between the Nuclear Regulatory Commission (NRC) staff and the Nuclear Energy Institute (NEI). At the meeting, NRC staff and the NEI discussed the forthcoming Regulatory Information Summary (RIS) on technical specifications requirements for instrument settings during testing. The NRC staff purpose of the meeting was to explain the objectives of the RIS and to answer questions pertaining to the content of the RIS.

Enclosures:

1. Meeting Summary
2. Agenda
3. NRC Handout
4. NEI Handout
5. Attendance List

cc w/atts: See attached page

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DATE	7/25/06	7/25/06	7/25/06				

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SUMMARY OF THE JULY 11, 2006 MEETING
WITH THE NUCLEAR ENERGY INSTITUTE ON TECHNICAL SPECIFICATIONS
REQUIREMENTS FOR INSTRUMENT SETTINGS DURING TESTING

On July 11, 2006, the Nuclear Regulatory Commission (NRC) staff conducted a public meeting with NEI at the NRC White Flint Offices in Rockville, Maryland to discuss a forthcoming Regulatory Information Summary (RIS), "NRC Staff Position on the Requirements of 10 CFR 50.36, "Technical Specifications," Regarding Limiting Safety System Settings During Periodic Testing and Calibration of Instrument Channels." This meeting was requested by the Nuclear Energy Institute (NEI) during a licensing action task force meeting held earlier this year. The NRC staff purpose of the meeting was to explain the objectives of the RIS and to answer questions. A copy of the meeting Agenda (Enclosure 2), NRC staff presentation handout (Enclosure 3), the NEI presentation handout (Enclosure 4) and a list of attendees (Enclosure 5) are attached.

The meeting provided an opportunity for NEI and the NRC staff to discuss issues that could occur during testing of instrumentation and which, therefore, may have an adverse effect on instrument operability.

The NRC staff stated that the RIS presents an approach, found acceptable to the NRC staff, for addressing the requirements of 10 CFR 50.36 for instrument settings during testing in licensing actions that require prior NRC staff approval.

The NRC staff discussed it's intention for issuing the RIS is to alert licensees to these issues because feedback from plant-specific licensing actions has shown that the NRC staff perspectives are not well understood resulting in excessive use of licensee and NRC staff resources to process licensing actions. The NRC staff stated that the perspectives contained in the RIS will be useful to licensees for developing content for technical specification license amendment applications.

The NRC staff discussed it's perspective on using the nominal setpoint to anchor test acceptance criteria. The NRC staff can accept nominal setpoints under certain conditions. Although the NRC staff prefers an as-found acceptance tolerance based on the last as-left value, the NRC staff also recognize (based on industry input) that this could be a significant burden. As a result, the NRC staff has listed conditions in the RIS that it considers necessary to permit the as-left setpoint to be anchored at the nominal setpoint.

NEI remarked that meetings like these are essential, and that documenting discussions is important. Also, an effort should be made to clarify the scope of functions that are LSSSs that are not related to safety limits.

NEI emphasized the importance of resolving the issue in an effective and efficient manner. NEI expressed concern that the RIS does not resolve two open issues with respect to TSTF-493, "Clarify Application of Setpoint Methodology for LSSS Functions," (1) scope criteria for the functions to be included in TSTF-493, and (2) instrument functionality. Thus, they expect issuing the RIS will prompt numerous responses from the industry. For this reason, NEI recommends issuing the RIS for public comment to ensure there are no disagreements on the issues in the upcoming revision to TSTF-493 scheduled for late September 2006.

With respect to the scope of instrumentation requirements for TSTF-493, revision 1, the NEI presentation (Enclosure 4) used diagrams to show that the instruments included in TSTF-493 should only be that subset of instruments with a significant safety function which protect the fuel boundary and reactor coolant system pressure boundary safety limits. With respect to the instrument functionality issue, TSTF-493, revision 1, will define a framework for determining acceptable methods for evaluating instrument functionality, including data assessment and criteria. NEI presented the process and schedule for issuing TSTF-493, revision 1.

NRC remarked that the consolidated line item improvement process (CLIIP) for TSTF-493 projection would be early 2007 based on an end of September submittal of TSTF-493 for staff review.

Agenda for July 11, 2006
Public Meeting with Nuclear Energy Institute (NEI)

Purpose: Discussion of forthcoming regulatory information summary on technical specifications requirements for instrument settings during testing

Meeting begins at 9:00 AM EDT

- | | |
|--|------------|
| 1. Introduction | NRC |
| 2. Purpose | NRC |
| 3. Explain Instrument Setting RIS | NRC |
| 4. Discuss industry questions | NEI |
| 5. Opportunity for public comment or questions | Public/NRC |

NRC Presentation Handout July 11, 2006

See Adams Accession No.: ML062020042

NEI Presentation Handout July 11, 2006

See Adams Accession No.: ML062020051

REGULATORY INFORMATION SUMMARY
ON TECHNICAL SPECIFICATIONS REQUIREMENTS FOR
INSTRUMENT SETTINGS DURING TESTING
ATTENDANCE LIST
JULY 11, 2006

<u>NAME</u>	<u>AFFILIATION</u>
CARL SCHULTEN	NRC/NRR
MICHAEL EDSON	SNC
RONALD JARRETT	TVA
NORMAN J. STRINGFELLOW	SNC
DAN W. HINES	SNC
JIM ANDRACHEK	<u>W</u>
DAN WILLIAMSON	EXCEL
ROBERT MANN	AREVA NP INC.
WES BOWERS	EXELON
MIKE SCHOPPMAN	NEI
JACK ROE	NEI
TIM KOBETZ	NRC/NRR
HUKAM GARG	NRC/NRR
ALLEN HOWE	NRC/NRR
JERRY MAUCK	HURST TECH.
JERRY VOSS	EXCEL SERVICES/SMTF
DONALD HOFFMAN	EXCEL/TSTF/SMTF
CHRISTOPHER JACKSON	NRC/NRR
CORNELIUS HOLDEN	NRC/NRR
PATRICK HILAND	NRC/NRR
CLIFF DOUTT	NRC/NRR
HAROLD CHERNOFF	NRC/NRR
EUGENE IMBRO	
DEANN RALEIGH	LIS/SCIENTEL
STEVEN ARNDT	NRC/RES
DON WOODLIN	STARS
NANCY CHAPMAN	BECHTEL
BILL SOTOS	
JOE COVEN	