

RISK INFORMED TECHNICAL SPECIFICATION TASK FORCE (RITSTF) RISK MANAGEMENT TECHNICAL SPECIFICATION INITIATIVE STATUS

INITIATIVE	TITLE	INITIATIVE STATUS	NEXT ACTIONS/SCHEDULE/ RESPONSIBILITY	TSTF NUMBER
1	Technical Specification Required Actions Preferred End States	<ul style="list-style-type: none"> NRC issued the CLIIP Notice of Availability for TSTF-422 on July 5, 2005. NRC issued the CLIIP Notice of Availability for TSTF-423 on March 10, 2006. 	<ul style="list-style-type: none"> NRC issued the TSTF-422 Notice of Availability on July 5, 2005. NRC issued the TSTF-423 Notice of Availability on March 23, 2006. TSTF-431 was distributed to the BWO and the RITSTF for review on 7/11/04. BWO Topical Report (BAW-2441) was submitted to NRC on 1/19/04. The NRC provided RAIs on 6/29/04. The BWO responded to the RAIs in 2/05. The NRC provided the draft SE for the BWO Topical Report for review in May 2006. Areva preparing comments. TSTF-431 will be revised and submitted to the NRC following approval of the Topical Report. Implementation guidance to be developed. WOG submitted their Topical Report on 9/9/05. NRC will review the WOG Topical Report in FY 06. 	TSTF-422-A R0 (CEOG) TSTF-423-A R0 (BWROG) TSTF-431 R0 (BWO) TSTF-432 R0 (WOG) <i>(Not created)</i>
2	Missed Surveillances SR 3.0.3	<ul style="list-style-type: none"> TSTF-358, R6 has been approved and published for CLIIP adoption. 	<ul style="list-style-type: none"> Initiative Complete. The TSTF issued implementation guidance, TSTF-IG-06-01, for TSTF-358 on 5/05/06. 	TSTF-358-A R6

NEI RITSTF

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3	Increase Flexibility in Mode Restraints LCO 3.0.4	<ul style="list-style-type: none"> TSTF-359, R9, has been approved and published for CLIIP adoption. 	<ul style="list-style-type: none"> Initiative Complete. The TSTF issued updated implementation guidance, TSTF-IG-06-02, for TSTF-359 on 5/08/06 	TSTF-359-A R9
4a	Individual Risk Informed Completion Times	<ul style="list-style-type: none"> Owners Groups (OGs) are pursuing generic Risk Informed Completion Time extensions through OG-specific Topicals and license amendments. 	<ul style="list-style-type: none"> TSTF-373R2, "Increase CIV Completion Time in Accordance With CE-NPSD-1168," approved on 2/27/04. The Notice for Comment for TSTF-409R2, "Containment Spray System Completion Time Extension (CE NPSD-1045-A)," was published on 4/11/06. The RITSTF provided comments on 5/10/06. On 6/13/06, NRC provided responses and requested a meeting. TSTF-417R0, "AC Electrical Power System Completion Times (WCAP-15622)," has been withdrawn. TSTF-430R0, "AOT Extension to 7 Days for LPI and Containment Spray (BAW-2295-A, Rev. 1)," approved on 8/5/04. NRC accepted TSTF-439R2, "Eliminate Second Completion Times Limiting Time From Discovery of Failure To Meet an LCO," as an administrative change in Rev. 3.1 of the ISTS NUREGs. The NRC completed their review of the Topical Report that supports TSTF-446R0, "Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)," on 3/10/06. Additional issues being pursued by the lead plant (Wolf Creek). RAI response scheduled to be submitted in July. Revision to the Topical Report or Traveler may be required. TSTF-454R1, "Extend PCIV Completion Times (NEDC-33046)," approved on 12/13/05. 	<p>TSTF-373-A R2 (CEOG)</p> <p>TSTF-409 R2 (CEOG)</p> <p>TSTF-417 R0 (WOG)</p> <p>TSTF-430-A R0 (BWOG)</p> <p>TSTF-439-A R2 (ALL OG)</p> <p>TSTF-446 R0 (WOG)</p> <p>TSTF-454-A R1 (BWROG)</p>

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4b	Risk Informed Completion Times With Configuration Risk Management Program or Maintenance Rule Backstop	<ul style="list-style-type: none"> Fort Calhoun, South Texas Project, and Prairie Island have volunteered to develop pilot submittals. Fort Calhoun and South Texas Project have submitted their pilots. The RITSTF is working to resolve the NRC's comments on the Risk Management Guidelines, the STP submittal, and the Traveler. 	<ul style="list-style-type: none"> RITSTF will develop a White Paper to address the interface of the a.4 process to the Initiative 4b and Initiative 6 process to show the overlap and transition for ITS and non ITS plants and will provide to NRC by 12/05. The RITSTF has created an Initiative 4b Subgroup to coordinate responses to the NRC RAIs. The RITSTF provided responses to the NRC and met to discuss these responses on 12/15/04. NRC visited STP week of 1/18/05 to evaluate applications of Initiative 4b. NRC and RITSTF met 3/17-18/05 and 5/3-5/4, 2005 to discuss policy issues. The RITSTF has revised the draft Risk-Managed Technical Specifications (RMTS) Guidelines document incorporating the results of the discussions with the NRC. The revised draft RMTS document was provided to the NRC at the August 2005 RITSTF/NRC meeting. NRC provided comments on the draft RMTS to RITSTF on 9/21/05. RITSTF developing a response. NRC and RITSTF met in 12/2005 to discuss the RAI responses on the STP pilot. RITSTF provided the revised RMTS guidelines document to the NRC on 2/3/06. NRC and RITSTF met to review the RMTS guidelines document on 2/28/06 and 4/27/06. RITSTF provided a revised RMTS guideline document to the NRC on 4/3/06 and 5/10/06. NRC visited STP 6/19-22/06 to audit process. The TSTF will submit a revision to TSTF-424 to address the NRC comments in the Fall of 2006. 	TSTF-424 R0

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5a	Relocate Surveillance Requirements Not Related to Safety	<ul style="list-style-type: none"> Deterministic portion of Initiative 5 transferred to TSTF responsibility. 	<ul style="list-style-type: none"> TSTF reviewing candidate SRs to be relocated. PWROG and BWROG to determine if funding will be requested for this initiative by 12/06. 	None assigned
5b	Relocate Surveillance Test Intervals to Licensee Control	<ul style="list-style-type: none"> RITSTF/BWROG/Pilot Plant are applying the methodology and interfacing with the NRC on the issues. 	<ul style="list-style-type: none"> The Limerick lead plant license amendment was submitted on 6/11/04. TSTF-425 was submitted to the NRC on 8/31/04. NEI provided the formal methodology document to the NRC on 2/3/05. NRC reviewed the Limerick LAR, TSTF-425, and the methodology document and issued RAIs 4/12/05 to the RITSTF. The NRC provided additional comments and the first set of RAIs on 10/20/05. The RITSTF has submitted responses to the first set of NRC RAIs in 12/05 and has significantly revised the methodology document. Limerick submitted responses to plant-specific RAIs in 12/05, 2/28/06, and 4/4/06. At the 2/22/06 TSTF/NRC meeting, the NRC stated that before approving TSTF-425 for general adoption, they would like a second lead plant in order to verify that the methodology is transferable. The NRC held an internal meeting on 5/30/06 to discuss the Electrical Engineering Branch's comments on TSTF-425. On 6/6/2006, NRC provided additional RAIs to Limerick. Limerick preparing response to NRC's RAIs. Draft to be provided to NRC in early 7/2006. 	TSTF-425 R0

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6a	Modify LCO 3.0.3 Actions and Timing 1 hour - 24 hours	<ul style="list-style-type: none"> On hold. 	<ul style="list-style-type: none"> On hold for resolution of Initiative 6b and 6c to determine if Initiative 6a is required. 	None assigned
6b	Provide Conditions in the LCOs for Those Levels of Degradation Where No Condition Currently Exists to Preclude Entry Into LCO 3.0.3	<ul style="list-style-type: none"> NRC issued Safety Evaluation for Topical Report on 7/9/04. TSTF-426 R0 was submitted to the NRC on 8/30/04. 	<ul style="list-style-type: none"> NRC issued Safety Evaluation for Topical Report on 7/9/04. TSTF-426 R0 was submitted to the NRC on 8/30/04. NRC provided an RAI on TSTF-426 on 11/13/04. The TSTF provided responses on 4/27/05. The TSTF-426 Implementation Guidance was provided to NRC in 8/05. NRC plans to issue the Notice for Comment by 7/15/06. 	TSTF-426 R0
6c	Provide Specific Times in the LCO For Those Conditions That Require Entry Into LCO 3.0.3 Immediately	<ul style="list-style-type: none"> NRC issued Safety Evaluation for Topical Report on 7/9/04. TSTF-426 R0 was submitted to the NRC on 8/30/04. 	<ul style="list-style-type: none"> NRC issued Safety Evaluation for Topical Report on 7/9/04. TSTF-426 R0 was submitted to the NRC on 8/30/04. NRC provided an RAI on TSTF-426 on 11/13/04. The TSTF provided responses on 4/27/05. The TSTF-426 Implementation Guidance was provided to NRC in 8/05. NRC plans to issue the Notice for Comment by 7/15/06. 	TSTF-426 R0

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7a	Impact of Non Technical Specification Design Features on Operability Requirements - Barriers	<ul style="list-style-type: none"> The NRC issued the FRN Notice of Availability for TSTF-372, Rev. 4 on 5/4/05. The TSTF issued implementation guidance, TSTF-IG-05-03, for TSTF-372 on 11/1/05. The NRC issued the FRN Notice for Comment for TSTF-427, Rev. 2 on 6/2/06. 	<ul style="list-style-type: none"> The NRC published the FRN Notice of Availability for TSTF-372 on 5/4/05. The TSTF issued implementation guidance for TSTF-372 on 11/1/05. TSTF-427 Implementation Guidance was provided to the NRC on 09/21/04. NRC provided comments on the draft guidance on 10/13/04. NRC provided RAIs on TSTF-427 and the implementation guidance on 11/13/04 and 6/2/2005. RITSTF provided responses to the NRC's RAIs on 3/23/05. Members of the TSTF & RITSTF met with the NRC on 7/28/05 to discuss the NRC comments. The revised Implementation Guidance and a draft of TSTF-427 were provided to the NRC on 11/10/05. The NRC provided comments in 12/05. The TSTF submitted a revision to TSTF-427 on 2/3/06. The RITSTF submitted the Implementation Guidance on 2/6/06. The RITSTF submitted the revised Implementation Guidance to address NRC comments on 4/4/06. The TSTF submitted a revision to TSTF-427 on 5/3/06. The NRC issued the FRN Notice for Comment for TSTF-427, Rev. 2 on 6/2/06. The TSTF and RITSTF to submit comments. 	<p>TSTF-372-A R4</p> <p>TSTF-427 R0</p>

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7b	Impact of Non TS Design Features on Operability Requirements – All other SSCs not in Technical Specifications	<ul style="list-style-type: none"> A White Paper on the process to address this scope of SSCs is being developed. 	<ul style="list-style-type: none"> RITSTF will develop a White Paper to outline the process and to address the scope of SSCs in 12/06. The TSTF will develop a Traveler following NRC acceptance of the White Paper process. 	None assigned
8a	Remove or Relocate Systems LCOs That Do Not Meet the 4 Criterion of 10 CFR 50.36 From Technical Specifications	<ul style="list-style-type: none"> A White Paper on the application of the 10 CFR 50.36 criteria has been developed. 	<ul style="list-style-type: none"> The TSTF has developed a White Paper to outline the guidance and methodology based on NEI 00-04 for the application of the four criteria of 10 CFR 50.36 and a list of the systems identified for relocation. The White Paper was provided to the Owners Groups in 12/05. The TSTF and RITSTF will develop a draft Traveler for Owners Group consideration by the third quarter of 2006. 	None assigned
8b	Modify 50.36 Rule to Permit Removal or Relocation of Non Risk Significant Systems out of Technical Specifications	<ul style="list-style-type: none"> Requires Rulemaking 	<ul style="list-style-type: none"> RITSTF looking at coordinating Initiative 8b with longer-term initiatives given the requirements for rulemaking. Approach favored by NEI and NRC is making Criterion 4 a “two way door” (e.g., if it doesn’t meet Criterion 4, Specification can be relocated even if it meets Criteria 1, 2, or 3). 	Not applicable

PWROG - Active in Initiatives 1, 4, 5, 6 and 7

BWROG - Active in Initiatives 1, 4, 5 and 8