

September 19, 2006

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

FROM: */RA/*  
Ross D. Telson  
Technical Specifications Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 17, 2006, CATEGORY 2 MEETING WITH  
THE TECHNICAL SPECIFICATIONS TASK FORCE (TSTF) TO  
DISCUSS TSTF SUBMITTALS, THE CURRENT TSTF TRAVELER  
PROCESS, AND HOW TO IMPROVE THE PROCESS.

On August 17, 2006, a public meeting was held between the U.S. Nuclear Regulatory Commission (NRC), and representatives of the Technical Specifications Task Force (TSTF) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, MD. The purpose of the meeting was to discuss the review of TSTF Travelers, which were proposed by industry as changes to the Standard Technical Specifications to be made available as "CLIIP" model license amendments. The meeting generally followed the agenda proposed in an August 3, 2006, Public Meeting Notice (ML062150543) as amended by the meeting participants. Original agenda topics are annotated with an (\*).

The TSTF provided the NRC with the following documents for discussion during the meeting:

1. TSTF-Proposed Amendment to Aug 06 NRC-TSTF Meeting Agenda (ML062560524)
2. TSTF-Reported Industry CLIIP Status 2006A - 8-09-06 (ML062560529)
3. July 18 2002 B Quigley Ltr re RCS Leakage Detection (ML021750003)
4. Enclosure to July 18 2002 B Quigley Ltr. (ML021750004)
5. Realistic Traveler RAI Schedule (ML062560551)
6. Future BWROG Topicals That Can Impact TS (ML062560552)
7. Status of 2006 TSTF Priorities (ML062560554)

On September 5, 2006, to promote a common understanding of issues intended actions from the meeting, the TSTF provided the NRC with their input to the TSTF's meeting minutes (ML ML062560503). The NRC reviewed and incorporated TSTF observations, as deemed appropriate. Enclosure 1 contains the minutes of the meeting, enclosure 2 contains a list of meeting attendees, and enclosure 3 is a TSTF address list. Meeting handouts, listed above with ML#'s, are available in ADAMS. Please direct any inquiries to Ross Telson at 301-415-2256, or [RDT@nrc.gov](mailto:RDT@nrc.gov).

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DISTRIBUTION:

ITSB r/f      RidsNrrDirs      RidsNrrDirltsb      TSTF Address List

ADAMS ACCESSION NOs: ML062560557-Package; ML062560503 - Memorandum;  
ML062560524 - TSTF-Proposed Amendment to Aug 06 NRC-TSTF Meeting Agenda;  
ML062560529 - TSTF - Reported Industry CLIIP Status 2006A -08/09/06; ML021750003 - July 18 2002  
B Quigley Ltr re RCS Leakage Detection; ML021750004 - Enclosure to July 18 2992 B Quigley Ltr;  
ML062560551 - Realistic Traveler RAI Schedule; ML062560552 - Future BWROG Topicals that can  
Impact TS; ML062560554 - Status of 2006 TSTF Priorities

OFFICE	DIRS/ITSB	BC/DIRS/ITSB
NAME	RTelson	TKobetz
DATE	9/19 /2006	9/19 /2006



## Meeting Minutes

A meeting was held on August 17, 2006, to discuss the review of TSTF Travelers, which were proposed by industry as changes to the Standard Technical Specifications, and other related matters. The meeting followed the proposed agenda provided in an August 3, 2006, Public Meeting Notice (ML062150543) as amended by the meeting participants. Original agenda topics are annotated with an (\*).

### I. \*Administrative Issue

- A. \*Introductions
- B. \*Agenda Review
- C. \*Other Administrative Issues
  - 1. Status of NRC activity to make electronic copies of all current plant TS available for NRC website
    - a. NRC plans to make public but probably 8-12 months
    - b. It is uncertain whether the TS will be maintained current
    - c. All TS conversions (about 70% of all plants) and amendments are currently available in ADAMS

### II. \*Process Issues

- A. \*Updated TSTF Review Procedures
  - 1. Status of DRAFT NRR OFFICE INSTRUCTION LIC-505 "Review of Technical Specifications Task Force (TSTF) Travelers for Incorporation into the Standard Technical Specifications and 'CLIP' Model License Amendments"
    - a. Currently in concurrence and is expected to be made public when final
    - b. NRC envisions that this process needs to be more efficient like the Topical process.
    - c. NRC anticipates:
      - (1) A pre-application meeting before a new Traveler is submitted,
      - (2) Completing a formal acceptance review,
      - (3) Establishing a formal milestone schedule for the NRC and the TSTF to complete activities and responses
      - (4) Publishing the schedule by letter and on the NRC website
      - (5) Formally documenting and publishing changes to the schedule
      - (6) Capturing these activities in ADAMS
      - (7) Accountability for the NRC and the TSTF
    - d. The TSTF proposed 90 days as a typical time required to respond to an RAI on a Traveler
      - (1) Under the process, the TSTF intends to advise the NRC in writing if they do not expect to meet a schedule

- (2) Unless an agreement has been previously reached to revise the schedule, the NRC intends to close the TAC, placing the review at the back of the priority queue, should the TSTF not submit RAI responses in accordance with the agreed-upon schedule, or should the RAI response content be deemed non-responsive to the RAI,
  - (3) NRC anticipates contacting the TSTF when major impediments or issues are identified during the review process
  - (4) For LARs the licensees usually get a draft set of RAIs and TSTF would like that process to be followed for Travelers
  - (5) NRC has discontinued the use of on-line commenting which was piloted for TSTF-493.
  - (6) The Acceptance Review conference call will allow NRC/TSTF to agree to a response time for RAIs
  - (7) NRC will consider maintaining RAI response time at 90 days
  - (8) Responses to RAIs must be signed by an authorized TSTF representative and formally submitted to the NRC in a manner that ensures the responses are captured by ADAMS (e.g. Use of EIE)
  - (9) Communications (e.g. phone calls, email, face-to-face discussion) on Tech Spec issues are to be documented by the TSTF and formally submitted to NRC; administrative communications (e.g. scheduling, confirming receipt of information, etc.) need not be documented
  - (10) Goals: accountability, documentation and efficiency
- e. TSTF suggested the NRC publish the Model Application for review with the CLIIP Notice for Comment
  - (1) DRAFT LIC-505 states that draft SE and the Model Application should be developed and published at the same time
- f. TSTF request that Travelers issued for comment not be removed from website until the Notice for Availability is issued
  - (1) NRC intends to retain listing the Traveler on the website until the Notice of Availability is issued
- 2. Status of LIC 101 "License Amendment Review Procedures" Revision
  - a. ITSB does not control the revision of LIC-101 and is, therefore, not in a position to discuss when the revision will be published
- 3. Use of Online Comment Resolution for Traveler
  - a. NRC does not intend to use for TSTFs
  - b. NRC will consider for future STS conversions
  - c. NRC is concerned that public openness could be jeopardized
- 4. TSTF is concerned that documents submitted by the TSTF through EIE as "public" are not placed into ADAMS as such and are thus not available to the public
  - a. NRC is investigating the extent and cause of the problem
  - b. TSTF would be willing to establish a Docket Number to ensure the documents submitted as public are placed into ADAMS as such

B. \*Updated Scheduling Process

C. \*TSTF Schedule Priorities

1. TSTF Priorities for 2006
  - a. TSTF-GG-05-01 Writer Guide was discussed. TSTF expressed the desire for NRC to review and endorse the current revision
2. TSTF/TSB Priorities for FY 2007
  - a. NRC believes maintaining a list of priorities is extremely useful for scheduling and presentation
  - b. NRC anticipates that the new process will outline the priorities

D. \*Fees

1. The TSTF expressed disappointment at the June 14, 2006 NRC letter rejecting fee exclusions for all TSTFs and indicated that the TSTF/Industry will continue to submit TSTFs that have real cost benefit
2. TSTF may pursue the decision on fee exempt with the NRC Office Director

**III. \*Public Participation Invited - No comments received**

**IV. \*TSTF Traveler Status Updates (Discuss Each Open Traveler)**

- A. \*Planned completion Dates
- B. \*RAI Dates
- C. \*FRN Dates
- D. \*Anticipated Technical Meetings

E. Updates Reviewed By TSTF Traveler Number:

1. TSTF-357, Rev. 1 Revision to TS 2.1.1.2, MCPR Safety
  - a. On hold until 12/31/2006
2. TSTS-409, Rev. 2 Containment Spray System completion Time Extension (CE NPSD-1045-A)
  - a. Due 9/30/06
3. TSTF-412, Rev. 2 Provide Actions for One Steam Supply to Turbine Drive AFW/EFW Pump Inoperable
  - a. Due 10/30/06
4. TSTF-424, Rev. 0 Risk-Informed HPSI AOT/CT Extension (WCAP-15773)
  - a. TSTF awaiting the resolution of some issues before creating full scope Traveler

5. TSTF-425, Rev 0 Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5
  - a. TSTF will submit a revision to NRC after Limerick LAR approved and expressed a desire for:
    - (1) NRC to CLIIP this change . 12/30/06 with Federal Register (FR) Notice for Comment (NFC) . 3/31/07
  - b. NRC anticipates establishing a goal of three months from the FR NFC to the FR Notice of Availability (NOA)
6. TSTF-426, Rev 0 Revise or Add Actions to Preclude Entry into LCO 3.0.3 – RITSTF Initiatives 6b and 6c
  - a. TSTF to provide comments by 8/20/06
7. TSTF-427, Rev 2 Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY
  - a. Due 9/30/06
8. TSTF-446, Rev 1 Risk Informed Evaluation of Extensions to Containment Isolation Valve Completion Times (WCAP-15791)
  - a. Awaiting NRC response to Wolf Creek RAls
9. TSTF-448, Rev 3 Control Room Habitability
  - a. Discussed TSTFs desire for the NRC to address plants that will need an exception to the SR in the model application
10. TSTF -450, Rev 0 Staggered Integrated ESFAS Testing (WCAP – 15830)
  - a. Due 7/31/2006
  - b. NRC to check on schedule
11. TSTS-459, Rev 1 Provide an Exception to the Requirement to Have One RHR Shutdown Cooling System in Operation
  - a. TSTF response due 9/26/06
12. TSTF-468, Rev 0 Follow Supported Systems Actions Due to an Inoperable MCC or Distribution Panel in lieu of ITS 3.8.9
  - a. TSTF Revise and resubmit deterministic change by 12/30/06
13. TSTF -475, Rev 0 Control Rod Notch Testing Frequency and SRM Insert Control Rod Action
  - a. BWROG to submit Topical Report requested in the NRC's RAI as a non proprietary version by 9/30/06
  - b. NRC anticipates opening a new TAC for a new review
14. TSTF-476, Rev 0 Improved BPWS Control Rod Insertion Process (NEDO-33091)
  - a. NRC anticipates FR NOA on or about 9/30/06
15. TSTF-477, Rev 2 Add Action for Two Inoperable Control Room AC

Subsystems

- a. (TSTF Action) Statement "not change the EQ temperature in the CR"  
NRC requested revision to remove some of the detail provided in the last revision
  - b. TSTF provide revision due 9/15/06
16. TSTF-478, Rev 0 BWR Technical Specification Changes that Implement the Revised Rule for Combustible Gas Control
- a. NRC has RAIs and intends to send them. BWROG will get back to NRC on the 5/30/07 date and if there are plants experiencing operational problems due to the delay of the Traveler by 8/30/06
17. TSTF-486, Rev 0 Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)
- a. TSTF requested NRC to look at date
18. TSTF-487, Rev 0 Relocate DNB Parameters to COLR
- a. (NRC Action) NRC to issue final version RAIs to TSTF by 8/19/06
19. TSTF-490, Rev 0 Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec
- a. NRC issue Notice for comment by 10/30/06
20. TSTF-491, Rev. 2 Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications.
- a. Notice for comment due 9/30/06
21. TSTF-492, Rev 0 Modify RHR – High Water Level Bases to Address Decay Heat Removal with Upper Internals Installed
- a. (EXCEL Action) Provide examples of other Bases change Travelers
22. TSTF-493, Rev 0 Clarify Applications of Setpoint Methodology for LSSS Functions
- a. Due 1/27/07
  - b. RIS is expected to be issued before 9/30/06
23. TSTF-495, Rev 0 Bases Change to Address GE Part 21 SC05-03
- a. OGs believe they could not make this change under 50.59 and the desire for an NRC SE to use as a basis for the plant specific Bases changes made under the TS Bases Control Program

**V. \*CLIIP Status**

- A. \*2006 Industry Survey on CLIIP Adoption
  - 1. TSTF-Reported Industry CLIIP Status 2006A - 8-09-06 on industry adoption of CLIIPs was provided (ML062560529)
- B. \*Discussion of Comments for recent FRN



1. NRC is revising the TSTF 374 Model Application
  - a. Issue of rejection based on significant differences between the LAR and the CLIIP – A Traveler based on a TSTF with significant variations would be rejected out of CLIIP to the normal process
  - b. NRC would like the licensee to have a dialogue with the staff before a TSTF is submitted

## **VI. \*Future Planning**

- A. \*TSTFs (Travelers) under development
  1. TSTFs that affect Technical Specifications Sections 1.0 and 3.0
    - a. There are 10 to 15 approved Travelers that address Sections 1.0 and 3.0
    - b. The TSTF would like NRC to package these Travelers together into one CLIIP to ease adoption for the industry
    - c. NRC has no planned activity to package the referenced Travelers. If the TSTF wishes, it may submit a written request which will be prioritized against other activities and reviewed for fee billing purposes.
  2. NRC CLIIP Development Requested List of Travelers
    - a. TSTF 360 was the number one TSTF
  3. The TSTF briefly discussed Topical Reports that they believed could affect Technical Specifications under Development and provided a handout (ML062560552).
  4. TSTFs Under Development
    - a. TSTF 468, TSTF 360, RG 1.45 Leakage
    - b. TSTF 468 and TSTF 360 by 12/31/06
    - c. TSTF 468 and 360 are candidates for CLIIP
    - d. The RG 1.45 RCS Leakage Monitoring TS by 3/31/07
- B. \*STS Updates
  1. Hold off until 8-10 TSTFs approved to develop Rev 3.2
  2. NRC is converting to Microsoft Word
- C. \*Emerging Technical Issues
  1. TSTF 360
    - a. TSTF plans to submit a revised TSTF 360 to NRC by 12/31/06 to allow for a Model SE and Model Application under CLIIP to be developed by the NRC in early 2007
  2. RCS Leakage Detection Instrumentation Sensitivity
    - a. Concern over instrumentation meeting the requirements of RG 1.45
    - b. TSTF provided handouts (ML021750003, ML02175004) regarding NRC response to Quigley in 7/02
    - c. TSTF plans to develop a T Traveler Bases change to address this issue

- d. NRC advised TSTF a revision of RG 1.45 is being developed
- e. TSTF asked for the opportunity to comment on this Rev 4 of RG 1.45
- 3. Non Condensable Gas Entrapment in ECCS Piping
  - a. NRC has observed continuing operating experience indicating that Emergency Core Cooling (ECCS) and Shutdown Cooling (SDC) Systems continue to experience periodic generic challenges associated with gas management
  - b. This issue was reviewed by the NRC and is the subject of ongoing agency generic application activity which could potentially impact Tech Spec requirements
  - c. TSTF expressed interest in participating in generic activities to determine appropriate (revised) Tech Spec requirements
- 4. Revision of Technical Specifications Table of Contents (TOC) under 10 CFR 50.92
  - a. The TSTF does not consider the TOC a part of Tech Specs in accordance with 10 CFR 50.36 but believes that licensees should make the necessary changes to the TOC
  - b. NRC indicated that, in some instances the TOC is part of the Tech Specs. Plants that are unclear may wish to examine their Tech Spec TOC for amendment numbers and/or revision bars to assist in making this determination and should discuss this with NRC on a case-by-case basis.
- 5. Diablo Canyon LAR Withdrawal Letter Regarding COLR
  - a. TSTF disagrees with the NRC position stated in the Diablo Canyon LAR
  - b. TSB is not aware of any generic activity to change how COLR is handled in Tech Specs
- 6. MSIV Actuation Train Operability Requirement for SSC with the 100% Capable Support System
  - a. The TSTF believes this is a generic issue that needs to be addressed generically
  - b. The TSTF will develop a White paper and establish a schedule to meet with NRC to develop generic guidance
- D. \*Administrative Issues
  - 1. TSTF may continue to use EIE
- E. \*Review of additional information or questions from today's meeting

**VII. \*Public Participation Invited - No comments received**

**VIII. Next Meeting**

- A. Tentatively Scheduled for November 30, 2006 at NRC HQ

**IX. \*Adjourn**

**August 17, 2006 NRC-TSTF Meeting Attendance**

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