

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Briefing on Technical Specification Revisions

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PUBLIC MEETING

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One White Flint North
Bethesda, Maryland
Monday, June 20, 1988

The Commission met in public session, pursuant to notice, at 2:45 p.m., the Honorable Lando W. Zech, Chairman of the Commission, presiding.

COMMISSIONERS PRESENT:

Lando W. Zech, Chairman
Thomas M. Roberts, Commissioner
Kenneth C. Rogers, Commissioner
Kenneth M. Carr, Commissioner

STAFF AND PRESENTERS SEATED AT TABLE:

S. Chilk, SECY
W. Parler, OGC
J. Taylor
E. Butcher
T. Martin

1 P R O C E E D I N G S

2 CHAIRMAN ZECH: Good afternoon, ladies and gentlemen.

3 The purpose of today's meeting is for the NRC Staff
4 to brief the Commission on the status of the technical
5 specification improvement program. This is an information
6 briefing. The technical specifications set forth the specific
7 characteristics of a nuclear power reactor and the conditions
8 for its operation that are required to provide adequate
9 protection for public health and safety.

10 Over the years there have been problems with both the
11 volume and the usability of the technical specifications. In
12 February 1987 the Commission issued an interim policy statement
13 on technical specification improvements. This policy was
14 intended to result in improved standard technical
15 specifications and to encourage voluntary licensee submittals
16 of revised technical specifications for their plants.

17 For today's meeting, we have asked the NRC Staff to
18 address specific issues. First of all, the progress of the
19 Staff's review of the owners groups split technical
20 specification submittals; second, the decisions of key program
21 implementation issues; and third, whether continued deferrment
22 of a final policy statement is warranted.

23 I understand copies of the slides are available as
24 you enter the room.

25 Do any of my fellow Commissioners have any opening

1 comments?

2 If not, Mr. Taylor, you may proceed.

3 MR. TAYLOR: Good afternoon, sir.

4 Starting, I think it's important to point out that
5 one of the major goals of the Staff effort on tech spec
6 improvements has been towards improving operational safety.

7 For example, as appropriate, the Staff is trying to
8 reduce surveillance tests while the plants are at power, to
9 reduce transients that are sometimes introduced and caused when
10 doing such surveillances. Efforts to improve equipment
11 reliability by reducing or eliminating surveillances which put
12 undue strain on equipment such as cold fast starts on diesels,
13 and another key thing, making tech specs cover the vital and
14 important safety checks and not trivia or relative trivia to
15 important safety checks which can sometimes cause operators to
16 have disdain for large and voluminous tech specs.

17 I'd like to underline that desire of the Staff to
18 improve operational safety and I will now turn to Tim Martin,
19 who will introduce the presentation.

20 CHAIRMAN ZECH: All right, thank you. You may
21 proceed.

22 MR. MARTIN: Thank you, Mr. Chairman.

23 I'd like to remind you that this effort started back
24 in 1983, research effort, I think it was documented in NUREG
25 1024. Quite frankly, this is one of our success stories.

1 We're not finished yet, but we're well on our way.

2 The purpose is and has always been the enhancement of
3 operational safety. We think we get that from several points:

4 First, the tech specs are being upgraded to remove
5 the ambiguity in the tech specs. They are being reduced in
6 volume, so that they do not distract the operators to less
7 significant safety issues. That's a double-edged sword: Not
8 only do you cut down the volume there, and thereby cut down on
9 the distractions; you release industry resources to do a better
10 job on concentrating on other safety-significant issues, and
11 you reduce the NRC Staff involvement in the day-to-day
12 activities so they can better focus on the safety-significant
13 issues. There will be less tech spec amendments as a result of
14 this, and we can then focus on the more safety-significant
15 ones.

16 New issues that have been incorporated into this
17 effort, we are trying to improve the reliability of equipment
18 by reducing the unnecessary testing that is wearing out some of
19 the major pieces of equipment, such as the diesels. And our
20 major effort right now is in reducing the transients that are
21 caused by unnecessary technical specification testing. We see
22 this as a major part in the closure of severe accidents, in
23 that enhancements in operational safety will reduce the risk
24 from severe accidents.

25 Our briefing today is a follow-up on a meeting that

1 we had about nine months ago where we gave you status of the
2 improvement program, and we talked about the public comments we
3 had received at that point. The Staff at that point
4 recommended delaying a final policy statement until we
5 completed two important milestones. One of those, as you
6 mentioned, is the development of the tech spec split document;
7 and the second, the resolution of the key implementation
8 issues.

9 We are here today to provide you an update on the
10 program, to discuss the results of these two important
11 milestones, and to make recommendations on whether to continue
12 deferral of the issuance of the final policy statement.

13 We will be answering the questions that were asked in
14 the February Staff requirements memo, and also other
15 discussions that we have had with the Commission Staff.

16 At this point I'd like to turn it over to Mr. Ed
17 Butcher, who is responsible for the implementation of this
18 program.

19 CHAIRMAN ZECH: Thank you. You may proceed.

20 MR. BUTCHER: Thank you.

21 I would like to turn to the first slide which
22 reiterates the program goals which you have already heard this
23 morning. We think it's important to focus on these goals a
24 little bit before we continue with the presentation. These
25 goals have been the hallmark and cornerstone for the program

1 from the very beginning. All the folks who are involved in
2 this program are both with the industry and with the NRC, keep
3 these goals uppermost in mind when determining which specific
4 tasks should have priority within the context of this program.

5 Improvement of operational safety is clearly number
6 one goal of the program. We think this can be achieved through
7 some very specific activities which are focused on some
8 specific problems that have been identified.

9 You have heard reducing the size and complexity of
10 technical specifications. This program, as it's currently
11 constructed, should result in a reduction of approximately 40
12 to 45 percent the number of limiting conditions for operation
13 which are retained in the specifications.

14 That should represent a significant reduction in both
15 the size and complexity of the document itself. There are
16 changes being proposed which will make the specifications that
17 are retained more understandable for operations personnel.
18 These changes are being accomplished both by changes in the
19 wording of the actual specification and its form and
20 presentation. There has been substantial input from both
21 operations people and human factors specialists to make certain
22 that the formatting changes that we make are the optimum
23 changes.

24 We are proposing many improvements to the actual
25 technical requirements within the document itself, so as to

1 remove those things which were not necessarily the optimum
2 response to given plant configurations.

3 Again, one of the principal ways that we hope to
4 improve operational safety is by reducing operational
5 transients, both those that are induced by mistakes, so to
6 speak, that are made while trying to perform surveillances at
7 power, and those which are induced by the specifications
8 themselves in terms of dictating mode changes when perhaps a
9 mode change at that particular time is not the optimum safety
10 action to be taken.

11 The second major goal is to provide a clearer link
12 between the technical specification requirements and their
13 safety significance. We have discovered that in the past, many
14 of the requirements were not as clearly articulated in the
15 specification itself and in the bases for the specification, so
16 that operations personnel would know the safety significance of
17 that specific requirement.

18 We propose major upgrades to the bases section of the
19 specifications to achieve this objective. In upgrading these
20 bases sections, it should also result in our ability to
21 facilitate improvements in the training of operations
22 personnel.

23 We think these are all -- these are important goals,
24 and again they represent the hallmark and cornerstone of the
25 program.

1 I would like to turn to the next slide. And what we
2 have tried to do with this slide is to outline the program or
3 break it down into its three major elements. The program has
4 focused in two principal areas: the development of the new
5 standard technical specifications to achieve the objectives we
6 have just reviewed, and a parallel program of specific
7 technical improvements -- we call them line item improvements
8 -- to the technical specifications as they exist today.

9 The distinction between element number one and
10 element number two of the program is that in element number two
11 of the program, we are making those changes immediately
12 effective today, so that we do not have to wait until the
13 completion of the new STS to begin to implement those changes,
14 and I will use the same example that was used earlier, things
15 like changes in testing requirements for diesel generators, and
16 I'll go over in detail some more of the specific changes that
17 we are making that are immediately available today to improve
18 operations.

19 The third element of the program is -- if I might
20 call it some housekeeping items that are necessary in order to
21 fully realize and implement the first two elements of the
22 program.

23 I have a separate slide for each element of the
24 program where I can provide more specific details on what it is
25 we are achieving.

1 For the first element, the development of the new
2 STS, the Commission has asked that we provide an update on the
3 status of some of our activities in this area, and that's what
4 we have on this slide.

5 We have progressed in an orderly process since the
6 publication or since the issuance of the interim policy
7 statement back in early 1987, through a series of specific
8 steps which are designed to make sure that the specifications
9 that we produced, the new standard, is the optimum document
10 that it can be, and that the process that we design for
11 implementing that standard makes the most effective use of both
12 industry and NRC Staff resources.

13 The first step in that process is we wanted to see
14 some model specifications from the industry groups that are
15 working with the Staff to develop the new standards, and we
16 were able to develop those and see those and get some feedback
17 from both the NRC, industry people, our people in the field,
18 the resident inspectors, and the utility operations people. We
19 were able to do that in mid-1987, so at that time we have in
20 fact developed the form and format for some of the new
21 specifications, and they were reviewed, and we have settled on
22 a specific approach that the new specs will be based on.

23 There were a number of implementation issues, what we
24 have been calling the key implementation issues, which are
25 those issues which relate to the specific process that we will

1 use to implement the new standards on the existing plants.

2 It was very important that we come to an
3 understanding with the industry on the appropriate milestones
4 and steps that one had to step through in order to convert an
5 existing specification to the new standard. There are many
6 operational questions that are raised by that process; there
7 are many resource allocation questions; there need to be
8 provisions made for public participation in those kinds of
9 licensing actions; and these issues were what we called the key
10 implementation issues. There were five of those issues, and
11 the last time we briefed the Commission, we were in the middle
12 of working on those issues and resolving our general approach.

13 If I may, I will just identify what the issues are
14 and say briefly how we resolved them.

15 There was the question of plant-specific deviations
16 from the new STS. To what extent would we require a plant
17 converting to the new STS to take those requirements as they
18 exist in the STS at that time, versus what are the existing
19 requirements in the current plant specifications?

20 For the most part, we don't anticipate adding any new
21 requirements to the new standards at this time over and above
22 which are already in the existing standard specifications. But
23 it is true that some of the plants out there with custom
24 specifications today don't have all of the standards that are
25 in the existing standard specifications -- don't have all the

1 requirements.

2 The Staff has taken the position, and we have
3 discussed this with the industry to make certain that we have
4 all the different points of view, and we have offered for
5 public comment these sorts of issues -- we have taken the
6 position that a plant, in converting to the new STS, should
7 adopt the new STS to the maximum extent practicable, and that
8 there should be a specific set of ground rules that one should
9 use in deviating from the new STS. There are benefits to be
10 accrued to both the industry and the NRC from having as uniform
11 requirements out there as possible.

12 The standards that we propose to use for deviations
13 from the STS include things such as where a plant-specific
14 design consideration dictates a deviation from the standard.
15 Another rule that we propose to use in making this judgment is
16 where plant-specific operating experience over the years --
17 many of these plants have been operating for many years, and
18 where the plant-specific operating experience indicates that
19 one can achieve the same level of safety with a requirement in
20 a different form than that which is in the standard, and then
21 that can be borne out by actual operating experience, we would
22 propose to allow that as a justification for a deviation from
23 the standard.

24 We would also propose that where a current
25 specification has been -- where a requirement in the current

1 standard specifications has been added to a plant in recent
2 years, and that change has been reviewed and approved by the
3 Staff, we would not propose to reopen those issues.

4 In other words, if the Staff has already approved the
5 deviation from the standard and that requirement has not
6 changed from the old standard technical specifications to the
7 new, we would not propose to reopen those issues. We feel that
8 an adequate review was done in the past.

9 The fourth basis for a change from the standard is
10 not really a separate thing, it's an amplification of the
11 previous basis for a change from the specification, and that is
12 where a hardware or organizational change would be required in
13 order for a plant to adopt the standard, we would not propose
14 to backfit any hardware changes at this time in order to make a
15 conversion to the new standard. We would not propose to force
16 any organizational changes on sites specifically as a part of
17 this activity for the purpose of the conversion to the
18 standards also.

19 With regard to the key implementation issues, they
20 have all been discussed with the parties involved, and there is
21 general agreement that these rules can in fact represent an
22 adequate framework for proceeding, and that these conversions
23 can be made.

24 The second issue that we wanted to focus on was the
25 Sholly noticing procedural requirements. There was the need to

1 focus on specifically how the Staff would meet the requirements
2 for noticing, and we have come up with several different
3 options on how that might be achieved. I don't propose to go
4 into it today other than to say that we have worked that out
5 with Staff counsel, and we believe that there are options that
6 would permit a timely notification without representing an
7 impediment to the speedy implementation of the new standard
8 specifications.

9 We have a little bit more work to do in that area to
10 optimize and select the most effective option, but there are
11 several options out there which represent acceptable solutions
12 to making certain that we don't impede the process
13 unnecessarily.

14 We discussed the need as the third issue, key
15 implementation issue, of changes from the regulations --
16 changes and revisions to the regulations for implementing
17 changes to the radiological effluent technical specifications.
18 There are no impediments to that process. The Staff can in
19 fact -- we have in fact defined the regulatory regulation
20 changes that are needed, and we are prepared to go forward with
21 those changes at this time.

22 We are exploring some options to -- which would
23 permit us to make some more immediately effective changes in
24 the area of radiological effluent technical specifications
25 which could be done in advance of or in parallel with the

1 rulemaking. So we don't believe that represents an impediment
2 to going forward.

3 Controls for relocated requirements. There was a
4 need to determine and to satisfy -- the Staff needed to satisfy
5 itself that there would be adequate control mechanisms
6 available for those things that were former technical
7 specifications and relocated out.

8 We have satisfied ourselves that the 50.59 rule
9 provides one control mechanism, the administrative control
10 procedures within the specifications for changes to plant
11 procedures provides another very substantial control mechanism,
12 and then there are controls for programmatic requirements, such
13 as the QA program and fire protection program and things like
14 that which, in case of fire protection program, remain in
15 Section 6 of the specifications.

16 So we have concluded that there are various options
17 depending upon the specific requirement that would be relocated
18 from technical specifications, which gives the Staff confidence
19 that the controls that are out there are adequate.

20 We will talk some more about the 50.59 process and
21 the update on how the guidelines that were developed for that
22 effort are proceeding, further in the presentation.

23 The final issue, key implementation issue, was the
24 content and control of bases. One of the reasons why the bases
25 has not been as useful in the past as we would like it to be in

1 the future is that the difficulty of processing changes to the
2 bases in the past, the Staff has pretty much taken the position
3 that the bases could not be changed without prior Staff
4 approval.

5 We believe that there are some aspects of the bases
6 which can in fact, under the regulations, be changed without
7 prior Staff approval, and that in the interest of maintaining
8 the bases current and making sure that they do achieve our
9 objective of facilitating and understanding of the basis for
10 the requirements and making sure that people fully understand
11 the requirement, that it's in the best interest to have some of
12 those changes to be able to be made by the individual utilities
13 without prior Staff approval.

14 There are some areas, such as where the change to the
15 basis might affect the margin of safety, where the Staff
16 believes that prior approval is still necessary; but for the
17 most part we believe that the control of that part of that
18 document can be turned over to individual licensees.

19 CHAIRMAN ZECH: Do we have the staff to support the
20 plant-specific technical specification questions that may come
21 up? Will we be able to review those sufficiently, do you
22 think?

23 MR. BUTCHER: You're referring to when we make the
24 conversions to the new STS?

25 CHAIRMAN ZECH: Right. And say they say, well, we

1 don't want to do that, we want to use the ones we have, and we
2 like this, it's an older plant, and we've got a lot of
3 experience -- what kind of an interplay do you expect there?
4 And mainly I'm interested in do we have enough, can we support
5 those kinds of questions that come up?

6 MR. BUTCHER: For the most part, we believe that it
7 is most resource-effective for both the utilities and the Staff
8 if everyone had the standard technical specifications.

9 CHAIRMAN ZECH: I understand that.

10 MR. BUTCHER: There are obvious economies of scale.

11 CHAIRMAN ZECH: But I'm thinking about an older plant
12 that has been operating for a long time, and they have what
13 appears to be a good suggestion about retaining some
14 specification or not adapting some part of the new ones. Can
15 we cover that? Is that going to be -- do we have staff
16 resources to respond to those kinds of matters?

17 MR. BUTCHER: We currently have to respond to those
18 individual plants. We have that situation that exists today, a
19 distinction between standard and custom plants. It represents
20 a resource burden to the Staff which we have been able to
21 absorb, and I don't think that burden will increase by virtue
22 of what we are doing here, so I would anticipate we would be
23 able to absorb it, too.

24 CHAIRMAN ZECH: Fine.

25 MR. BUTCHER: Again, we are encouraging the maximum

1 amount of voluntary participation that we can get. And we are
2 encouraged by the feedback we get from the industry, that there
3 is substantial interest and there will be a large amount of
4 participation.

5 CHAIRMAN ZECH: How much have you brought in the
6 operators and the operational people into the tech spec review
7 program in total?

8 MR. BUTCHER: The operations perspective has been
9 brought into the program in several different ways. The
10 original studies which defined that which was needed to be
11 changed in the current specifications included input by
12 operations personnel. Those studies, both done by the old then
13 AIF organization, and the special study group that was set up
14 within NRR, I guess about three years ago. Operations --
15 visits were made to the site, operations personnel were
16 interviewed. The original study, NUREG 1024, which was done
17 back in 1983, had input from operations people. In
18 constructing the format, the new format, we have had input from
19 operations people there.

20 I personally have visited all the regions and met
21 with the resident inspectors at their regular resident
22 gatherings to make certain that what we are doing here from an
23 operations standpoint makes sense to those folks.

24 We have had -- we actually have introduced a system
25 of rotational assignments within the branch that's responsible

1 for creating these specifications. We have an individual now
2 working in the events assessment branch, and there is an
3 individual from the events assessments branch who, within NRR,
4 are the folks that had the day-to-day contact. They are
5 working on this program also. So we have made a conscious
6 effort to bring operations in.

7 CHAIRMAN ZECH: Have the utility people themselves
8 participated heavily in the program?

9 MR. BUTCHER: The operations side of the house?

10 CHAIRMAN ZECH: Yes.

11 MR. BUTCHER: Yes, sir. It's my understanding that
12 they have, in fact, inputted to all the major studies that have
13 been done.

14 I have visited one of the sites for the lead plants
15 that will be the first to convert to the STS and talked with
16 operations people myself, and I have trips scheduled to do all
17 the rest of them also, as part of this program.

18 CHAIRMAN ZECH: Fine.

19 MR. MARTIN: Mr. Chairman, just to amplify; if there
20 is a wholesale request by licensees to pick and choose from the
21 standard tech specs, we will have a backlog problem. We don't
22 anticipate that's going to happen, and we can -- some licensees
23 will need to do that, we understand that. But if it was a
24 wholesale thing, we would have difficulty in entertaining all
25 the amendments simultaneously.

1 CHAIRMAN ZECH: Okay. Fine. Thank you.

2 MR. BUTCHER: I'd like to say a few words about the
3 tech spec split report. That was a major effort where we felt
4 it was important to define early in the program the specific
5 LCOs, limiting conditions for operation, that would be
6 retained, and those that would be relocated, and we entered
7 into a major effort and study to apply the criteria for the
8 contents of the technical specifications that were in the
9 interim policy statement, and that effort was completed just
10 recently in May.

11 COMMISSIONER ROBERTS: Well, the last time you
12 briefed us, wasn't that to be completed in early '88?

13 MR. BUTCHER: That may be the case, yes, sir. We
14 just completed it here in May.

15 Now when I say completed it, we published the report.
16 We actually received the industry's input on their judgment as
17 to how the criteria ought to be applied, and the Staff did its
18 independent review of how the criteria might be applied. It
19 was in the April timeframe that -- March and April, that we
20 actually had the judgments, we wanted to have some more
21 meetings. We had several iterations back and forth to make
22 sure we got it right.

23 This program has been marked by very deliberate
24 process of stepping through, step by step, and not proceeding
25 into the next step until we have complete confidence that we

1 have in fact gotten it right, so to speak.

2 The bottom line on that was it confirmed our earlier
3 judgments that a significant portion of the spec could be
4 relocated, and depending upon the specific generation of plant
5 and the specific vendor involved, it was something between 30
6 and 45 percent of the LCOs could be relocated. That was
7 confirmed by this study, both by the industry groups working on
8 it, and the Staff group.

9 The most significant finding of that effort that is
10 also confirmed in an earlier conclusion that the Staff had
11 reached independently, was that there is one area of the
12 criteria that could use some clarification, and that is in the
13 area of specific requirements that are in the standards to
14 preclude unanalyzed events. That was not as clearly
15 articulated in the criteria as it could have been, and that's
16 the one area that we have learned something about the criteria
17 that would indicate some clarification is needed. That's
18 criterion 2.

19 So that pretty much brings you up to date where the
20 split results are behind us, we understand what the new spec
21 will contain now, the key implementation issues are pretty much
22 behind us. We have a few minor details to work out there, but
23 none of those represent any impediment to proceeding forward
24 with the complete program.

25 There are a number of ongoing activities. I have

1 already referred to the Staff visits to the lead plants, which
2 we hope to begin moving into that process right now. One of
3 our principal objectives there is to bring an operations --
4 direct feedback from operations personnel on the specifications
5 as they exist today.

6 In early -- in late '88 to early '89, we expect to
7 see complete submittals from the industry on what the new STS
8 would look like.

9 COMMISSIONER ROBERTS: Is that a slip from the last
10 time you briefed us?

11 MR. BUTCHER: Yes, sir, I would have to say that's
12 about three to six months slip. It's primarily the result of a
13 pause in the process to work out the key implementation issues
14 in the split. Both the Staff and the industry groups, the
15 owners groups, working with us, concluded that that was a
16 worthwhile thing to do.

17 It's a slip in terms of when the actual deliverables
18 would be completed. The work continued while we were going
19 through these efforts; it just resulted in a slip on when it
20 would be completed.

21 I want to make it clear here that in late '88, we
22 will begin to see pieces of it. In fact, we have already seen
23 a few pieces of the new STS, but it will not be until '89 until
24 we see a complete new set of STS for any one of the vendors.

25 We have made a commitment to develop a very ambitious

1 review turnaround from the Staff, and our decisions on whether
2 or not we can accept the new STS in the format as proposed by
3 the groups working on it in the industry, and that is a six to
4 nine-month turnaround, which indicates that late '89, early
5 '90, we hope to have the Staff complete its evaluation of the
6 new STS and the lead plant reviews which will be done roughly
7 in parallel, but a bit behind the individual STS. We want to
8 be getting feedback from the actual conversions to the STS as
9 we are finalizing what the new document will look again.
10 Again, to bring an actual experience operations perspective to
11 the process of the conversions.

12 You can see that we have listed here as October '88
13 for issuance of the final policy statement, and in terms of the
14 sequence of events, it is a bit out of order. In other words,
15 the current schedule that we have proposed for the final policy
16 statement comes before we have completed the STS, and it comes
17 before we have actually seen the application of the new STS to
18 any given plant.

19 The Commission asked at this briefing that we address
20 the question of whether or not it makes sense to continue
21 deferral of the publication of the final policy statement.
22 Staff is still evaluating that, but I anticipate that we would
23 be coming forth with a proposal that would indicate that it
24 would make more sense to continue the deferral on the interim
25 policy statement until we have at least seen a significant

1 portion of the new STS to make certain that the specific
2 problems that the thing we are focusing on now, is the concern
3 that we have had with criterion 2, and whether or not it
4 articulates as precisely as it can the requirements related to
5 things needed to prevent unanalyzed accidents.

6 The final bottom line on the program is we would
7 expect to see in late '90 complete -- many, many submittals
8 from the industry. There's no reason at that point why any
9 individual utility should have any hesitance whatsoever about
10 applying for an amendment to convert to the new STS, and we
11 would expect to see wholesale license amendments at that time
12 to begin that process.

13 The final date for when we would complete those
14 reviews is largely dependent upon the availability of resources
15 to allocate to that task.

16 COMMISSIONER CARR: When would the approved STSs be
17 on the street?

18 MR. BUTCHER: The approved STS would be on the street
19 in late to early '89 to '90. In early '89, you would see the
20 STS, I would expect pretty much in the form in which it will
21 look. If someone wanted to see what the new STS were going to
22 look like, I think what is available in early '89 will be the
23 picture. And we are not really too far away from that at this
24 point.

25 CHAIRMAN ZECH: All right. Proceed.

1 MR. BUTCHER: I guess at this point, unless there are
2 any questions --

3 CHAIRMAN ZECH: Go ahead. Let's move along.

4 MR. BUTCHER: -- I'd like to proceed to this second
5 element of the program, which is the parallel program for line
6 item improvements.

7 Again, I would like to reiterate that these are
8 changes that we are making to the current STS which are
9 available for immediate implementation. There's no need to
10 wait for a conversion to the new STS in order to implement
11 these.

12 Some of the completed -- and these are significant.
13 Some of the completed activities to date, we have made
14 revisions to the general requirements in the specifications
15 which make it no longer necessary for the individual utilities
16 that file the appropriate license amendments and have them
17 approved and have their specifications changed, it's no longer
18 necessary to declare equipment inoperable merely because it has
19 missed a surveillance requirement.

20 In the past, that has resulted in some mode changes,
21 transients, operation of the plant that really, in our mind,
22 was not justified.

23 We have also made some clarifications with regard to
24 the appropriate use of specification 303 to make it clearer
25 with regard to removing redundant systems from operation at the

1 same time. We felt that was an area that was unclear and it
2 ought to be clarified, that the Staff did not intend to see
3 that occur.

4 There are a number of other administrative changes in
5 that section of the specification which are required to
6 preclude unnecessary changes and -- I mean unnecessary mode
7 changes, and to remove unnecessary restrictions on mode
8 changes.

9 We have recently approved a change for the relocation
10 of organization charts from the specifications under some
11 specific ground rules which have been retained within the
12 specifications. We have found that that is a tremendous
13 resource saver in terms of the needing to process license
14 amendments. Many, many license amendments were being generated
15 by relatively minor changes in the organizational structure.

16 Many of the utilities have implemented this change,
17 and it was implemented immediately, because there were many
18 pending organizational changes that people wanted to have
19 reflected in a regulatory document.

20 We have approved surveillance interval extensions,
21 and this is a major activity, for GE and Westinghouse plants
22 for the reactor protection system. Before the year is out, we
23 expect to make similar approvals for all of the vendor -- all
24 the types of reactors out there for both the reactor protection
25 system and the engineered safety features actuation.

1 This change alone will result in a 57 percent
2 reduction in the amount of testing at power that's done for
3 instrumentation of systems in the plant.

4 It would result in something like -- a rough estimate
5 would be 1000 to 1500 separate tests per year that are done at
6 testing per plant that would no longer be needed. That
7 translates into something like 200,000 to a quarter of a
8 million tests that are now done that will no longer have to be
9 done after the end of this year, once these approvals are
10 accomplished.

11 COMMISSIONER CARR: Well, you say you have completed
12 that?

13 MR. BUTCHER: Say again, sir?

14 COMMISSIONER CARR: That work is done, but then you
15 tell me that when something is approved -- so I don't know what
16 the status of that is.

17 MR. BUTCHER: I should clarify that. The Staff has
18 approved for Westinghouse and General Electric plants those
19 changes. There have been some license amendments, but not a
20 great deal. The principal reason why they have not been
21 implemented and the testing has actually not been reduced, is
22 because you need similar changes to the engineered safety
23 features actuation system, because some of the instrumentation
24 appears in both systems.

25 We anticipate by the end of the year having it out --

1 having the approvals out on the street for both of them, which
2 would mean amendments could be filed immediately to accomplish
3 that objective.

4 Some of those amendment approvals are expected as
5 early as September, but by the end of the year, we should have
6 all of them behind us.

7 We have also been through the process of relocating
8 detailed lists and tables from the specifications which
9 generate a lot of unnecessary license amendments. Things like
10 lists of snubbers in the plant, penetration over current
11 protection devices, containment isolation valves; things that
12 can be controlled very nicely in a design document like the
13 FSAR.

14 Other ongoing activities. Removal, relocation of
15 fire protection system requirements. This is an implementation
16 of an earlier generic letter. We have been trying to do these
17 plant by plant, and it became very resource-intensive. It was
18 taking a lot of time, so we just kind of called a pause till we
19 could get a generic position out there to make that process
20 move a lot smoother. We are taking that to CRGR, I believe,
21 tomorrow, so that should be immediately available.

22 COMMISSIONER ROBERTS: Didn't the Commission approve
23 that as part of the Appendix R generic letter that was done in
24 March of '86?

25 MR. BUTCHER: That's correct. The Commission

1 directed that those requirements should be relocated -- well,
2 that those requirements could be relocated from specification,
3 once that license amendment was implemented. What it turned
4 out is that one needed more specific guidance than just you can
5 relocate them in order to accomplish that and to implement the
6 other parts of the generic letter. And that was causing a
7 plant-by-plant review, which was eating up a lot of resources
8 and causing delay. We have drawn back from that position and
9 come up with a generic process that can be done so that the
10 amendment can be processed by the project manager, and does not
11 require any special attention by any of the technical
12 specialist branches to implement.

13 That's an interesting change, because it turns out
14 that something like 20 to 25 percent of the LERs that are
15 generated today are generated from fire protection requirements
16 that exist in the specification. And recent studies have been
17 done to show that all of those violations are of low safety
18 significance. So it's a major reduction in resource -- or
19 major change in resource allocation from lesser safety-
20 significant things to more safety-significant things.

21 Again, I'll mention that there's a --

22 COMMISSIONER ROBERTS: Should that remind me of
23 something Bill Dircks used to tell me, that the Staff didn't
24 write the fire protection system, the Commissioners did?

25 No comment?

1 [Laughter.]

2 MR. BUTCHER: I have already indicated that by the
3 end of the year, we will have the other topical reports on the
4 RPS and SFAS surveillance changes in.

5 We propose to, hopefully by the end of August, to
6 complete a program to relocate cycle specific parameters from
7 the specification. What that will do is eliminate the need for
8 the Staff to make individual reload license amendments, except
9 in those cases when there are substantial changes in the
10 constitution of the core. We process those amendments today,
11 and in many cases, they can be substantial resource
12 commitments.

13 We also, by August, hope to remove a restriction on
14 extending surveillance intervals related to surveillances that
15 are done at refueling outages. Frequently utilities come out
16 of a refueling outage, and right away, they turn around in
17 having to go into a shutdown to do surveillances which have
18 come due. We propose to remove that restriction, because it
19 -- there is no technical justification for it. And that
20 specific application, the restriction on 25 percent extension
21 of surveillance intervals over a three-interval period, will be
22 retained for those things which can be done that are not
23 affected at refueling, that are not necessarily being done at
24 refueling.

25 Again, there's a tremendous effort underway to focus

1 on testing at power, and in conjunction with the work that's
2 already being done on the topical reports on instrumentation,
3 we have initiated a short term 90-day program to completely
4 reexamine all the surveillances that are in the specifications
5 now that are done at power, or at any -- in any mode of
6 operation; to identify those which can be changed, based upon
7 engineering judgment, and just plain common sense, and past
8 experience with having done those surveillances, without
9 requiring a rigorous PRA risk sort of calculation.

10 We have passed through the specifications already
11 line by line on the surveillance requirements in connection
12 with this specific initiative that we have, and we have
13 determined that there are many candidates in there for
14 adjustment. And this relates to major mechanical components.
15 So far the emphasis has been other than diesel generators or
16 instrumentation.

17 As part of that program, we will conduct visits to
18 each of the sites to confirm our own conclusions with
19 operations personnel on whether these tests are overburdensome
20 and are causing problems.

21 CHAIRMAN ZECH: I think it would be helpful for the
22 Commission to get a paper on this subject, on reduced testing
23 at power, and reduced surveillance while the plant is operating
24 at power levels. I think that part of your program that might
25 be useful for us to just elaborate a little bit on a paper to

1 send to the Commission and tell us exactly what you're doing in
2 this area. It's a very important area.

3 MR. BUTCHER: Yes, sir. We have such a paper under
4 preparation, and we had scheduled it to, I believe it was,
5 early in August, when we expected to have it available for the
6 Commission.

7 CHAIRMAN ZECH: Well, get it to us soon.

8 MR. BUTCHER: Yes, sir.

9 CHAIRMAN ZECH: Thank you.

10 COMMISSIONER CARR: What's the date on that 90-day
11 program? When did it start, and when is it going to finish,
12 and what do you expect to have at the end of it?

13 MR. BUTCHER: Well, we are about two weeks into it
14 right now, and at the end of it, we expect to have two things:

15 We expect to have some requirements identified which
16 we believe can be changed immediately without any further
17 study.

18 COMMISSIONER CARR: Well, will they have to go
19 through that generic routine, like fire protection, or are we
20 going to get rid of them right away?

21 MR. BUTCHER: We are going to make those immediately
22 available. Now we do have administrative processes, checks and
23 balances, such as the CRGR, that reviews, and things that we
24 will go through. But I wouldn't anticipate that it would be
25 any more than a 60 to 90-days before these things are available

1 to people. You have to take time to --

2 COMMISSIONER CARR: After the 90 days?

3 MR. BUTCHER: That's correct.

4 COMMISSIONER CARR: We're talking six months.

5 MR. BUTCHER: That's a fair goal for that.

6 The second thing we would expect to come out of that
7 90 days would be an identification of those things while we
8 cannot, based upon the limited review that we have done in this
9 short period of time, make a final conclusion, we believe that
10 there is a substantial reason to believe that given a little
11 bit more study, they could be adjusted, and we would highlight
12 and identify those and expect to have those implemented prior
13 to the development of the new -- the completion of the new STS,
14 so those changes can be folded into the new STS. And that
15 longer term effort would be done in conjunction with a study
16 that AEOD is doing right now on the specific surveillances and
17 what the results of those surveillances would say about the
18 frequency at which they are done, and the effect that those
19 surveillances have on inducing transients. That work has
20 already been done, has already been initiated by AEOD, and
21 they're beginning to get some preliminary results now on the
22 percentage of transients that are induced that come from
23 specifications.

24 CHAIRMAN ZECH: On this testing and surveillance
25 program, you're trying to cut down on testing of surveillance

1 at power, I would hope that after you come across something
2 that is clearly doable and makes sense, that we don't have to
3 wait till '89 or '90 or '91 to get it done. I hope we will
4 just be able to factor that into something that we can do
5 before that time. Because in my experience in looking at these
6 plants, there's a lot of room for improvement in that area. We
7 do too much testing at power, too much testing when the plant
8 is operating, too much surveillance, and good people make
9 mistakes, and we challenge the plant.

10 So if you come across something that clearly should
11 be changed, I hope we're not going to wait a great deal of time
12 to get everything with a big ribbon around it to change
13 anything.

14 MR. BUTCHER: Yes, sir. That's our intent.

15 CHAIRMAN ZECH: Keep that in mind, and get the word
16 up the line to the Staff, that we make -- you know, sensible
17 changes don't have to take forever.

18 MR. BUTCHER: Yes, sir.

19 CHAIRMAN ZECH: Okay.

20 MR. BUTCHER: At this point, I would like to --
21 unless there are any further questions on this parallel program
22 for the line item improvements, I would like to turn to the
23 housekeeping tasks that I spoke to earlier, the other
24 miscellaneous tasks that need to be done in order to fully
25 implement the program.

1 One of the specific things that the Commission has
2 asked for feedback on is the progress that we have made in
3 developing guidelines for what we call quality 50.59 reviews.
4 If we are going to be relocating things from technical
5 specifications and putting them in the environment where the
6 individual licensees can make changes without prior Staff
7 approval, we have to have confidence that the process that they
8 will use for making those changes is adequate.

9 We have entered into an effort with the industry to
10 examine the 50.59 process, and to -- for the Staff to define
11 specific requirements that would constitute things that have to
12 be satisfied in order to have a quality 50.59 review.

13 The industry has established a working group under
14 NUMARC, NSAC, to develop a set of guidelines and propose them
15 for Staff review. The Staff has established a working group to
16 do the same thing, and to interact with the industry, and to
17 develop its own regulatory guide, hopefully based upon the work
18 done by both working groups, to assure that the 50.59 reviews
19 are done correctly.

20 We have received a -- one draft has been reviewed of
21 the document. There have been comprehensive comments back from
22 the Staff. The general reaction is very favorable. It was a
23 very comprehensive document, and the guidelines were very
24 sharply defined, and we feel that it is going to represent a
25 significant improvement in the 50.59 process.

1 The next draft we --

2 COMMISSIONER ROGERS: Excuse me. When did you say
3 you'd have that -- you think that's going to be completed?

4 MR. BUTCHER: The next draft of that is due to be
5 completed in September-October of this year. The last draft,
6 we formally provided our comments back to the NUMARC NSAC
7 working group on, I think it's May the 12th of this year.

8 The effort is on schedule to support the conversions
9 to the new STS, because that's frankly what's driving the
10 process. We have concluded, and it was stated in the interim
11 policy statement, that an individual utility could not adopt
12 the new STS until both the Commission and the Staff and the
13 utilities were satisfied that there was a suitable 50.59
14 process in place. And the schedule that we have for this
15 effort is compatible with that, and there is no problem.

16 I believe the Staff did recently propose a change in
17 the track date which called for a regulatory guide to be issued
18 in September of this year, and clearly it will not be issued at
19 that -- on that date, but it will be issued in plenty of time
20 to support the conversion to the new STS.

21 The rulemaking on radiological effluent technical
22 specifications, as I indicated earlier, we are pursuing two
23 avenues with that. We believe there are many improvements that
24 can be made in that area of specifications now, without waiting
25 for a rule change, and we would propose to proceed with a rule

1 change immediately in parallel with our effort. Sometimes rule
2 changes can be -- can take time, so we believe that we ought to
3 proceed with a line item improvement on those changes that can
4 be made without -- absent the rule change in that area. But we
5 will have also started a rule change action in that area.

6 In the area of risk-based technical specifications,
7 in the policy statement, that's acknowledged as an important
8 area for the current program and for future activities, and we
9 have devoted significant effort to that area.

10 In the case of the extensions on surveillance
11 intervals for instrumentation, there have been substantial
12 changes based upon rule changes in that area and -- excuse me,
13 based upon PRA methods in that area.

14 A longer term area that we are looking at is we have
15 a current longer term study to study the feasibility of
16 reducing core melt frequency by controlling plant configurations
17 which result in high short-term risk. Experience with the
18 existing specifications has shown that sometimes the secondary
19 configuration of the plant, in conjunction with the
20 configuration of the safety systems at any given time, can
21 result in unusually high risk. When those things are averaged
22 out over the life of the plant, or over a year, using the
23 current methods, what we discover is they don't always -- what
24 you need is a system that acknowledges the current
25 configuration of the plant, and defines the instantaneous risk,

1 short term risk, associated with that.

2 In order to achieve that objective, we believe that
3 that may require some fairly significant changes in the whole
4 approach that we use for technical specifications, and we are
5 looking into that right now, as to what that would look like.
6 That would be the next generation of specifications that we
7 would turn to.

8 COMMISSIONER CARR: That effort is not going to delay
9 what you are doing now?

10 MR. BUTCHER: Not at all. And we set it off as a
11 separate program that is separately funded, so as not to impact
12 this program.

13 I might point out that research in that area is being
14 done in Europe right now, as we speak, and they have made
15 substantial progress in that area, and some of the feedback
16 that we get indicates that it holds real promise for the
17 future.

18 I guess at this point I would like to just reiterate
19 all the things we have said here today, that so far in our
20 presentation, that the overall program that's designed to have
21 a significant impact on safety and on the resource
22 requirements, to maintain safety in the reactors that exist
23 today and in the future, and the program will improve
24 operational safety by letting operators focus more on the most
25 safety-significant aspects of the requirements that are

1 necessary, and making technical specifications more
2 understandable and less ambiguous, and by the specific
3 technical improvements that we intend to make to the specific
4 line items within the specifications.

5 We believe that this effort will result in more
6 reliable and efficient plant operation. Needless restrictions
7 on mode changes would be eliminated, and transients and mode
8 changes induced by specifications would be reduced.

9 And finally, the bottom line is that all of this can
10 be done and at the same time result in fewer resources
11 committed to things like unnecessary license amendments,
12 interpretation problems, and these resources that are saved can
13 be turned to the more safety-significant aspects of the
14 regulatory requirements.

15 That concludes my prepared remarks. We are prepared
16 to answer any specific questions that the Commission may have.

17 CHAIRMAN ZECH: All right. Thank you very much.

18 Questions from my fellow Commissioners? Commissioner
19 Roberts?

20 COMMISSIONER ROBERTS: No.

21 CHAIRMAN ZECH: Commissioner Carr?

22 COMMISSIONER CARR: It was a little fuzzy to me on
23 that October '88 final policy statement. I couldn't tell
24 whether you were telling me you weren't going to make, or you
25 were going to make it.

1 MR. BUTCHER: I guess we were trying to tell you that
2 we could make it, but that we believe that it would be prudent
3 to see this new STS in its final format, or at least to have it
4 in house before we finalize that policy statement. We have
5 identified one area and that is the area of requirements that
6 are necessary to preclude unanalyzed accidents that we think
7 should be sharpened, and in the coming months, as we develop
8 the new STS would be the right forum in which to sharpen that
9 language.

10 COMMISSIONER CARR: If you don't have an October '88
11 date, what date are you having?

12 MR. BUTCHER: Clearly we would have it issued before
13 the date that we proposed to have for the new STS approval,
14 which would be late '89, early '90. I think probably mid-'89
15 would be plenty of time, because by then we will have the new
16 STS, we will have had a chance to look at it in its entirety
17 and in context. It's difficult to make these judgments line by
18 line. You need to see the document in context.

19 So I believe the Staff will come back with a
20 recommendation that we continue to defer issuance of the final
21 policy statement.

22 COMMISSIONER CARR: The other question I've got is
23 how is the backlog of routine tech specs now coming along, and
24 are you still handling those? And are you at all stopped while
25 this is going on?

1 MR. BUTCHER: We are clearly not at all stopped.

2 Tim, I'm not familiar --

3 MR. MARTIN: We're not at all stopped, but it is
4 slowly increasing.

5 MR. BUTCHER: One thing that should hopefully begin
6 to turn that around, we won't be processing fire protection
7 tech spec amendments in the near future. We won't be
8 processing organization charts, and we won't be processing
9 emergency tech spec changes associated with some surveillances
10 that come due that really are too frequent.

11 CHAIRMAN ZECH: Commissioner Rogers?

12 COMMISSIONER ROGERS: Well, a couple of questions.
13 Where does the general area of internal
14 communications equipment and anything relating to that, fall?
15 Is that in the tech spec now?

16 MR. BUTCHER: You mean internal, within the plant
17 itself, the electronic communications?

18 COMMISSIONER ROGERS: Yes.

19 MR. BUTCHER: I don't believe any of that equipment
20 is controlled by specification.

21 COMMISSIONER ROGERS: Are you addressing that in any
22 way? This is a very important area, and you know, that's
23 something that has been a contributor to some of the
24 surveillance testing problems, lack of adequate communications.
25 Maybe reducing some of the surveillance tests will mitigate

1 that a little bit, but still the quality and nature of
2 principally, you know, the electronic aspect of it, although we
3 have all seen the use of language is an important thing, how
4 that's being done is important. It may not have to be in the
5 tech specs, but where is that being addressed, if at all?

6 [Commissioner Roberts left the room at 3:35 p.m.]

7 MR. BUTCHER: In this specific program, we do not
8 have specific focus on that aspect of it.

9 Now I think it is important to point out that one of
10 the objectives of this program is to get the kinds of resource-
11 intensive things out of the specs that are eating us up now,
12 and it's our hope to have that resource available to go back
13 and reexamine questions like this, and that's what we would
14 intend to do with that resource. And we would hope that the
15 utilities -- and we have every reason to expect that they would
16 use that increased resource available for better training of
17 people that are using those kinds of internal communication
18 devices.

19 The current requirements are quite burdensome in
20 terms of the resource requirements to satisfy them.

21 COMMISSIONER ROGERS: Yes. Right.

22 MR. BUTCHER: There's not a lot of time left over.

23 COMMISSIONER ROGERS: Right.

24 Just what are the lead plants, and how were they
25 chosen?

1 MR. BUTCHER: There's one for each vendor right now,
2 and we chose them in cooperation with the industry owners
3 groups in developing the new STS. There's one for each vendor.
4 North Anna, for Westinghouse; Crystal River for B&W; San Onofre
5 for CE.

6 COMMISSIONER ROGERS: Just roughly, what were the
7 criteria for making a choice there, do you know?

8 MR. BUTCHER: We tried to mix up a variety of plants
9 with the standard ones with the current standard specs, and
10 ones with custom specs. We wanted to find a design which was
11 pretty much representative of the general class of plants out
12 there, tried to do that.

13 In the case of General Electric, in order to achieve
14 that objective, we ended up with having to have two lead
15 plants, Grand Gulf for the BWR 6s, and Hatch for the later or
16 the earlier model designs.

17 There have been a couple of plants that have
18 indicated a desire to be parallel lead plants. In the case of
19 Rancho Seco, they have indicated a desire to make an early
20 conversion to the new STS. There's some likelihood we will run
21 them in parallel. We have had -- and this is what encourages
22 me, we have had inquiries from several plants with custom
23 specifications, which would also like to be thoroughly in the
24 implementation process.

25 I'm not convinced that we can have seven or eight or

1 10 lead plants. That defeats the process and it is not very
2 efficient. So I don't know that we can accommodate everybody
3 that would like to get in as the first round of plants; but
4 certainly by adjusting resources, we can get early reviews for
5 these folks.

6 [Commissioner Roberts entered the room at 3:38 p.m.]

7 COMMISSIONER ROGERS: What have been the kinds of
8 sticky issues that have developed so far with industry in this
9 program?

10 MR. BUTCHER: Well, I have to be honest. The key
11 implementation issues, the question of the amount of deviation
12 that we can stand on an individual plant from the standard that
13 we are proposing has been a major concern to individual
14 utilities. And I can understand why. They have a plant they
15 believe operates safely now; they see the benefits of
16 converting to the new STS; but they don't want to run ripples
17 through their whole organization in making the conversion, but
18 at the same time they want to get the benefit.

19 So we believe the ground rules we have established
20 give them the flexibility they need to do that, and that's the
21 feedback we are getting from them, that it does give them
22 flexibility that they need to do that, and -- but that has been
23 a major sticking point.

24 There is a great deal of concern about the resources
25 required to process the license amendment and the noticing

1 procedures. There's some -- the average plant out there has
2 150 LCOs in it, and if they have to deal with those changes
3 line by line, that becomes a rather significant package to
4 submit. We have looked at several alternatives to make sure
5 that we satisfy the noticing requirements, but at the same
6 time, we don't use a process that consumes any more resources
7 than we have to.

8 I think we have come up with several alternatives
9 that satisfy the objective, but that's been a major concern.

10 COMMISSIONER ROGERS: Does this open up the door for
11 really new activities to shut a plant down, in going to a new
12 set of tech specs?

13 MR. BUTCHER: Well, clearly any major license
14 amendment offers opportunity for public participation in the
15 process, and this wouldn't be any different. It's a license
16 amendment, and this wouldn't be any different from that.

17 Now the rules provide for participation before the
18 amendments are issued, and participation after the amendments
19 are issued, depending upon the substance of the change, and
20 that's what we are focusing on now.

21 We believe, all indications we have so far, are that
22 this change can be done in a manner which would provide for the
23 amendment to be issued prior to the completion of any hearing
24 which might be requested on it.

25 COMMISSIONER ROGERS: Just one final one. What is

1 the legal status of the relocated specifications, when you take
2 them out of the tech specs and they go some place else in the
3 documentation? What is the legal status of those things then?

4 MR. BUTCHER: They acquire the legal status of the
5 document they get relocated to. In the case of something going
6 to the FSAR, it is governed by the 50.59 regulation. In the
7 case of something that is relocated to a plant procedure, it's
8 governed by the administrative control requirements on plant
9 procedures which lie in the utility's QA program under the -- I
10 believe it's Appendix B of the regulations, and by the specific
11 requirements for plant procedures and changes to plant
12 procedures which are written into Section 6 of the technical
13 specifications.

14 In the case of some things which are governed by the
15 regulations -- I'm thinking in terms of code requirements, ASME
16 code requirements, they are driven by the regulation which
17 references that code.

18 So these things take on the same regulatory status as
19 the document that they are relocated to.

20 COMMISSIONER ROGERS: Thank you.

21 CHAIRMAN ZECH: Well, I would certainly encourage you
22 to continue to work with individuals with operating experience
23 at the plants, those who will be using the tech specs, and make
24 sure that they get a chance to participate in this very
25 important endeavor.

1 I would also encourage you to look very carefully as
2 you go through the process at where we can reduce testing and
3 surveillance at power. We have mentioned -- and you are going
4 to give us a paper on that.

5 Many of us, as we visited the plants, almost every
6 time, some discussion of tech specs comes up, and I have heard
7 it, you know, for a number of years now, and so -- and I am
8 encouraged by what you are telling us. I know we are making
9 progress, but it's such an important program, and it does
10 impact on safety. It certainly could impact on safety. I've
11 seen some of the tech specs that we have in the control room,
12 and they are just voluminous, as we know, and it is
13 discouraging for the operators to have to even try, especially
14 in emergency situations or in time of stress, to use these
15 documents that are so voluminous.

16 So what you are doing is extremely important, and I
17 would just emphasize, I think it's awfully important for the
18 operational people themselves to participate in this, because
19 they are going to be the benefactors in many ways. And also
20 they can make an input that's very real and practical, and so I
21 would encourage you, as you continue in the program, to ensure
22 you get the input from those in the plants themselves.

23 I guess the other thing that you've told me, I know
24 resources are always a problem for us, as well as the
25 utilities, and we must be realistic about it, and I asked you

1 earlier about resources, and I think you told me that you
2 thought you had enough resources to cover the program. But the
3 benefits of this program, if we are to achieve them in a timely
4 fashion, do require resources, we know that, and perhaps I
5 should ask Mr. Martin or Mr. Taylor if they think that NRC in
6 general, in headquarters and in the field, is applying proper
7 resources to this endeavor?

8 MR. MARTIN: At this point in time, we are. We do
9 not have standard tech specs in front of us to review. We
10 anticipate a major crunch and need of additional resources in
11 the fiscal year '90 timeframe. The budget we are working on
12 right now will reflect that, and again, we are going in with an
13 operational assumption that the majority of licensees will opt
14 for the standard tech specs. If we are hit with a wholesale
15 request for custom tech specs and pick-and-choose, then we have
16 not budgeted properly.

17 CHAIRMAN ZECH: Well, let's be mindful of that,
18 because we are involved here in an area of amendments, and it
19 does take time and it does take resources, so I certainly agree
20 that I would hope that most would opt for the standard tech
21 specs, but I submit, too, that if they participate in the
22 program, there perhaps may be more of a feeling of ownership.
23 They might be more motivated to do it, if they feel it's going
24 to be in their best interest, and if it's going to be in the
25 interest of reliability and safety.

1 So I think the approach you take is important, and
2 that's why I emphasize involvement of those who are going to be
3 the users, and that may help with the resources, too.

4 Well, unless there are any comments from my fellow
5 Commissioners, let me just say --

6 COMMISSIONER CARR: May I make one comment?

7 CHAIRMAN ZECH: Commissioner Carr.

8 COMMISSIONER CARR: You started out on a note of
9 optimism, saying what a successful program this was. I imagine
10 if I asked the guy on the other end who has been waiting since
11 '83 to give you a mark, he might not agree with that, but I
12 encourage you to go ahead, this is very important, and we need
13 to get it done, and we need to get it behind us.

14 CHAIRMAN ZECH: Yes, I agree with that comment, too.
15 It's all relative, I suppose, from where you sit, but those of
16 us who have heard so many complaints about it, and have seen
17 the big thick books that we're talking about, have a certain
18 empathy for the operators. And on the other hand, we don't
19 belittle the task, and those of you who are involved in it, I
20 commend you for your efforts, and just hope that resources will
21 be supplied, and I ask Mr. Taylor to take a special look at it
22 to make sure that we are putting our money and our resources
23 where our mouth is, because this is an important area, and it's
24 something I think we can gain in safety particularly in, and so
25 resources are important. But the schedule is important, too,

1 and we don't want to see the schedule just keep drifting along.
2 And that's why we recognize that if we need to put more
3 resources, we'll just have to find out how to do that.

4 Mr. Rogers?

5 COMMISSIONER ROGERS: Just one further thought, and
6 that is I think that it is important to keep emphasizing and
7 reemphasizing that this is a program which really is going to
8 improve safety. I think we all believe that. I think we
9 understand it, but I think it's very important that that point
10 be made at every single opportunity. Because it is easily
11 misconstrued, and that this -- that first the safety
12 improvements really are palpable that will come out of this,
13 I'm sure; but I think it's important not to simply say that and
14 then forget it, but to reemphasize it every time at every
15 opportunity. Because it's easy to misread this as something
16 that is being less assiduous or less regulatory in its nature,
17 when in a sense it really is a big step forward in improving
18 plant safety. And I think that is something we have to keep
19 reminding the world about.

20 CHAIRMAN ZECH: And perhaps also remind them that a
21 safe plant is a reliable plant is an economic plant, and they
22 all go together.

23 Any other comments?

24 All right. Thank you very much. We stand adjourned.

25 [Whereupon, at 3:50 p.m., the meeting was adjourned.]

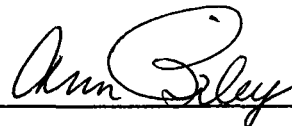
CERTIFICATE OF TRANSCRIBER

This is to certify that the attached events
of a meeting of the U.S. Nuclear Regulatory Commission
entitled:

TITLE OF MEETING: Briefing on Technical Specification
Revisions
PLACE OF MEETING: Washington, D.C.

DATE OF MEETING: Monday, June 20, 1988

were transcribed by me. I further certify that said
transcription is accurate and complete, to the best
of my ability, and that the transcript is a true and
accurate record of the foregoing events.



Ann Riley & Associates, Ltd.

COMMISSION BRIEFING

ON THE

TECHNICAL SPECIFICATIONS IMPROVEMENT PROGRAM

JUNE 20, 1988

PROGRAM GOALS

- IMPROVE OPERATIONAL SAFETY BY
 - REDUCING THE SIZE AND COMPLEXITY OF TECH SPECS
 - MAKING TECH SPECS MORE UNDERSTANDABLE TO OPERATIONS PERSONNEL
 - MAKING IMPROVEMENTS TO SPECIFIC TECHNICAL REQUIREMENTS
 - REDUCING OPERATIONAL TRANSIENTS
- PROVIDE A CLEARER LINK BETWEEN TECHNICAL REQUIREMENTS AND THEIR SAFETY SIGNIFICANCE
 - ALLOW THE OPERATORS AND PLANT STAFF TO FOCUS ON THE MORE RISK SIGNIFICANT REQUIREMENTS
 - ALLOW FOR PROPER UNAMBIGUOUS INTERPRETATIONS OF TECH SPECS
 - FACILITATE IMPROVEMENTS IN TRAINING

IMPLEMENTATION OF THE INTERIM POLICY STATEMENT

THE PROGRAM WILL IMPLEMENT THE COMMISSION'S
POLICY STATEMENT THRU:

- I. DEVELOPMENT OF NEW STS
- II. A PARALLEL PROGRAM OF SPECIFIC LINE ITEM
IMPROVEMENTS TO TECHNICAL SPECIFICATIONS
- III. OTHER ACTIVITIES NECESSARY TO FULLY
IMPLEMENT THE POLICY STATEMENT

I. NEW STS DEVELOPMENT

◦ COMPLETED ACTIVITIES

- NRC STAFF REVIEWED MODEL SPECIFICATIONS AND SUPPORTING DOCUMENTATION FOR TWO OWNERS GROUPS MID 87
- KEY IMPLEMENTATION ISSUES ADDRESSED JAN 88
- STS "SPLIT" REPORT ISSUED MAY 88

◦ ONGOING/PLANNED ACTIVITIES

- STAFF VISITS LEAD PLANTS LATE 88
- INDUSTRY COMPLETES REWRITE OF STS LATE 88—EARLY 89
- STAFF COMPLETES REVIEWS OF NEW STS AND BEGINS REVIEW OF LEAD PLANT SUBMITTALS LATE 89—EARLY 90
- ISSUE FINAL POLICY STATEMENT OCT 88
- ADDITIONAL LICENSEE CONVERSIONS TO NEW STS LATE 90

II. PARALLEL PROGRAM FOR LINE ITEM IMPROVEMENTS

◦ COMPLETED ACTIVITIES

- REVISION OF THE STS GENERAL REQUIREMENTS 3.0/4.0
- RELOCATION OF ORGANIZATION CHARTS
- W AND GE PLANTS RPS STI AND AOT EXTENSIONS
- RELOCATION OF DETAILED LISTS AND TABLES

◦ ONGOING/PLANNED ACTIVITIES

- REMOVAL OF FIRE PROTECTION SYSTEM TS
- VENDOR OWNERS GROUPS' TOPICAL REPORTS
[APPROX 7] RPS/ESFAS STI's AND AOT's
- RELOCATION OF CYCLE-SPECIFIC PARAMETER LIMITS
- REMOVAL OF 3.25 LIMIT ON EXTENDING REFUELING
OUTAGE SURVEILLANCES
- REDUCED TESTING AT POWER PROGRAM

III. OTHER MISC SUPPORT TASKS

- GUIDELINES FOR CONDUCTING 10 CFR 50.59
REVIEWS
- RULEMAKING FOR RADIOLOGICAL EFFLUENT
TECH SPECS [RETS]
- RISK—BASED TECHNICAL SPECIFICATIONS

OVERALL PROGRAM IMPACT ON SAFETY AND RESOURCE REQUIREMENTS

- IMPROVE OPERATIONAL SAFETY
- MORE RELIABLE AND EFFICIENT PLANT
OPERATION
- RESOURCE SAVINGS TO BOTH NRC AND
INDUSTRY