



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

August 26, 2019

MEMORANDUM TO: Victor G. Cusumano, Branch Chief
Technical Specifications Branch
Division of Safety Systems
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager */RA by Andrea Russell for/*
Technical Specifications Branch
Division of Safety Systems
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JANUARY 28, 2019, TELECONFERENCE CALL
WITH THE TECHNICAL SPECIFICATIONS TASK FORCE RE:
IMPLEMENTATION OF TSTF-542, "REACTOR PRESSURE VESSEL
WATER INVENTORY CONTROL"

On January 28, 2019, a Category 2 public teleconference call was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the Technical Specifications Task Force (TSTF). The purpose of the call was to discuss the implementation guidance of TSTF-542, "Reactor Pressure Vessel Water Inventory Control," as it relates to the use of limiting condition for operation (LCO) 3.0.8. The notice is available in the Agencywide Documents Access and Management System at Accession No. ML19015A109. A list of attendees is enclosed.

NRC staff was concerned that licensees may have been misinterpreting the implementation guidance, specifically the following sentence: "Therefore, LCO 3.0.8 may be applied to exclude penetration flow paths with nonfunctional snubbers that could result in a limiting drain rate due to common mode failure from the Drain Time calculation." Technical Specification (TS) LCO 3.0.8 provides either a 12-hour or 72-hour delayed time allowance or time relaxation for snubber(s) when the snubbers are unable to perform their associated support function. The NRC staff informed the TSTF that they had an elevated sensitivity regarding the potential impacts that outage-related activities could have on the bounding Drain Time calculation of record. Non-seismic-related initiating events on critical piping pathways, which are not bounded by the Drain Time calculation, could result in reduced operational flexibilities. The requirements of TS LCO 3.5.2 (i.e., Conditions C, D, and E) may establish more restrictive plant conditions as compared to the applicability statements included in TS LCO 3.0.8.

CONTACT: Michelle C. Honcharik, NRR/DSS
301-415-1774

The NRC staff and TSTF representatives agreed that LCO 3.0.8 is not an exception to performing a surveillance requirement. In addition, both parties agreed the conditions described in LCO 3.0.8 need to be met to invoke the delayed time allowed. The TSTF representatives will provide a document clarifying the intended implementation of TSTF-542 to industry.

There were no handouts for the meeting.

No members of the public had comments.

Project No. 753

Enclosure:

As stated

cc: See next page

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"REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL"
DATED: August 26, 2019

Project No. 753

Enclosure:
As stated

cc: See next page

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**ADAMS Accession No.: Package: ML19029A017, Meeting summary: ML19029A016;
Meeting notice: ML19015A109**

***concurred via e-mail**

NRR-106

OFFICE	NRR/DSS/STSB	NRR/DSS/STSB/BC	NRR/DSS/STSB
NAME	MHoncharik	VCusumano	MHoncharik (ARussell for)
DATE	8/22/2019	8/22/2019	8/26/2019

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LIST OF ATTENDEES

Brian Mann	TSTF, EXCEL Services Corporation
Jana Bergman	Curtiss-Wright/Scientech
Tracy Orf	Tennessee Valley Authority
Ozzie Vidal	Certrec Corporation
Lee Marabella	PSEG Nuclear
Mitchel Mathews	Exelon Nuclear
Dennis Pereira	Entergy, River Bend Station
Patrick Simpson	Exelon Generation Company
Paul Duke	PSEG Nuclear
Ryan Joyce	TSTF, Southern Nuclear Operating Company
Chris Smith	Energy Northwest, Columbia Generating Station

NRC Staff:

Caroline Tilton
Victor Cusumano
Michelle Honcharik
Jennifer Whitman
Diana Woodyatt
Bob Tjader
Russ Haskell
Michael Marshall
Larry Wheeler

Technical Specifications Task Force Project No. 753

cc:

Technical Specifications Task Force
c/o EXCEL Services Corporation
11921 Rockville Pike, Suite 100
Rockville, MD 20852
Attention: Brian D. Mann
E-mail: brian.mann@excelservices.com

James P. Miksa
Entergy Nuclear Operations, Inc.
Palisades Nuclear Power Plant
27780 Blue Star Memorial Highway
Covert, MI 49043
Email: jmiksa@entergy.com

Jordan L. Vaughan
Duke Energy
EC07C / P.O. Box 1006
Charlotte, NC 28202
Email: jordan.vaughan@duke-energy.com

Ryan M. Joyce
Southern Nuclear Operating Company
3535 Colonnade Parkway / Bin N-274-EC
Birmingham, AL 35243
Email: rmjoyce@southernco.com

David M. Gullott
Exelon Generation
4300 Winfield Road
Warrenville, IL 60555
Email: David.Gullott@exeloncorp.com

Wesley Sparkman
Southern Nuclear Operating Company
3535 Colonnade Parkway / Bin N-226-EC
Birmingham, AL 35242
Email: wasparkm@southernco.com