

OFFICE OF NUCLEAR REACTOR REGULATION

LIC-601, Revision 1		Improved Technical Specification Conversion Amendment Review Procedure	
Volume 600		Standard Technical Specifications	
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Date Approved:		January 28, 2020	
Effective Date:		January 28, 2020	
Certification Date:		January 28, 2025	
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Summary: This issuance of LIC-601, Revision 1, "Improved Technical Specification Conversion Amendment Review Procedure," establishes the new format, removes incorrect ADAMS hyperlinks, updates primary contact information, and includes minor edits to improve clarity.			
Training:		None	
ADAMS Accession Number:		ML19323E497	

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Office Instruction: LIC-601, Revision 1, "Improved Technical Specification Conversion Amendment Review Procedures" Dated: January 28, 2020

ADAMS Accession No: ML19323E497 * via email

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1. **POLICY**

Section 182a of the Atomic Energy Act (the “Act”) requires applicants for nuclear power plant operating licenses to include technical specifications (TS) as part of the license. The Commission’s regulatory requirements related to the content of TS are stated in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, “Technical specifications.”

Starting in the late 1980s, NRC and industry representatives sought to develop guidelines for improving the content and quality of nuclear power plant TS. This led to the development of the Improved Standard TS (ISTS) and a revised 10 CFR 50.36. On July 22, 1993, the Commission issued its Final Policy Statement on 10 CFR 50.36, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement described the safety benefits of the ISTS and encouraged licensees to use the ISTS as the basis for plant-specific TS amendments and for complete Conversions to Improved Technical Specifications (ITS) based on the ISTS.

This Office Instruction should be utilized to the greatest extent possible during the review of ITS Conversion amendments.

2. **OBJECTIVES**

The overall objective of an ITS Conversion, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline a licensee’s TS to provide more readily understandable requirements that help ensure safer operation of the unit, while satisfying the requirements of 10 CFR 50.36. This provides as much consistency in the license requirements as possible, to the extent that the plant-specific design basis can conform with the related ISTS. The objective of this Office Instruction is to document the practices that have been in place and used effectively for ITS Conversion reviews. The practices described in this Office Instruction are unique to the review of ITS Conversion amendment requests. It is the intent of this Office Instruction to work in conjunction with the processes in the other Nuclear Reactor Regulation (NRR) Office Instructions, e.g., regarding acceptance reviews, license amendment reviews, requests for additional information, and regulatory audits; however, when differences exist between this Office Instruction and other Office Instructions, this Office Instruction should be followed for ITS Conversions to ensure the review is completed in an efficient manner. Because of their scope and complexity, ITS Conversions are considered exempt for workload management purposes. Additionally, the schedules and metrics stated in other NRR Office Instructions, e.g., regarding acceptance reviews, license amendment reviews, requests for additional information, and audits do not apply to an ITS Conversion review.

3. **BACKGROUND**

The NRR Office Instruction on the license amendment review process contains the general guidance for the review of license amendments. ITS Conversions are complex amendments that require additional specific guidance and unique practices to ensure that high quality reviews are conducted in a timely manner. While practices have been in place for reviewing ITS Conversion amendments, there had been no formal documentation of the specific processes used. Without formal documentation, varying practices can be employed leading to inconsistent or inefficient reviews. This Office Instruction, when used in conjunction with the NRR Office Instructions on acceptance review procedures, license amendment review,

requests for additional information, and regulatory audits, where appropriate, will ensure that a consistent and efficient ITS Conversion review takes place.

4. BASIC REQUIREMENTS

This Office Instruction provides additional information on pre-submittal meetings, work planning, acceptance reviews, main reviews, Request for Additional Information (RAI) resolution, Safety Evaluation (SE) write-ups, and other close-out activities associated with an ITS Conversion amendment.

4.1 Pre-Submittal Meetings

Due to the complexity of ITS Conversions, pre-submittal meetings between NRC staff and the licensee are highly encouraged. The meetings should cover the expected review schedule, the ITS Conversion process, and the NRC staff should discuss any lessons learned from previous ITS Conversions. An example of a pre-submittal brief from a previous ITS Conversion can be found in the Agencywide Documents Access and Management System (ADAMS) (ADAMS Accession No. ML092040269).

To maximize the benefit of pre-submittal meetings, meetings should take place prior to the licensee developing a submittal. This would ensure common understanding of the ITS Conversion process and would therefore allow for a more efficient use of NRC resources. Participants in the pre-submittal meeting should include but not be limited to: the licensee, Division of Operating Reactor Licensing (DORL) project manager (PM), Technical Specifications Branch (STSB) lead reviewer, STSB reviewers and technical branch reviewers.

4.2 Work Planning

Every TS Conversion is, by definition, unique since the starting point will always be site-specific. In addition, resources and competing workload items must also be taken into consideration. Work planning and review schedules depend on whether a submission has items requiring extensive formal review by branches other than STSB, and items beyond the scope of the existing ISTS, such as licensing basis changes, incorporated in the Conversion. For example, inclusion of deviations from NRC-approved Technical Specification Task Force (TSTF) travelers, presents significant risk to the project schedule.

As an example only, a schedule for a conversion may proceed as follows:

- Acceptance / Initial Review Phase
- Main Review Phase
- Issue Resolution and Submission of Revisions by Licensee
- SE Preparation, Document Routing, and Issuance

Each ITS Conversion amendment contains “in-scope” changes and may contain a list of changes that identify the need for a possible formal technical branch review. “In-scope” items consist of changes that either maintain the Current TS (CTS) or adopt the most recent revision of the ISTS, as applicable to the plant’s current licensing basis. Although any technical branch may sign into the ITS Conversion review, “in-scope”

changes are typically only formally reviewed by STSB staff. Since a majority of the work is typically performed by STSB staff, an STSB lead reviewer is assigned to coordinate STSB efforts and interface with the DORL PM.

The submittal should contain a list of self-identified items which may require a formal technical branch review. The DORL PM will work with STSB staff to determine which licensee identified items require a formal technical branch review. These typically represent changes that differ from both the CTS and the ISTS and may represent a change to the plant's design basis being incorporated into the Conversion application.

These items should be assigned to the appropriate technical branch for review immediately upon receipt of the amendment request, and an acceptance review of that portion of the license amendment request should be performed. Appendix B contains examples of items that may require a formal technical branch review. These changes may affect timely completion of the review of a Conversion amendment.

4.3 Acceptance Review

During the acceptance review, a goal for the STSB reviewer is to quickly identify issues that will require input (formal or informal) from a technical branch other than STSB. In order for the technical branch input to be timely and not impact the Conversion schedule, the branch's input should be solicited during the acceptance review.

While not a complete list, the following are typical "red flags" that a proposed change may require additional review:

- Deviations from the ISTS, or ISTS Bases
- Relocated limiting conditions for operation (LCOs) and removed requirements
- CTS changes that are consistent with the ISTS, but require the licensee to make a change to plant design or analyses

Similar to self-identified items discussed in Section 4.2 above, these NRC-identified items may be assigned in the work tracking and financial management systems by the DORL PM as appropriate. Due dates requested for RAIs and SEs should be appropriate to the overall Conversion schedule. Late identification of issues requiring technical branch input have caused significant delays of past Conversions due to workload issues within the technical branches solicited for input.

The Notice of Consideration of Issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Consideration Determination, and Opportunity for a Hearing should be published with instructions on how members of the public can access the RAI database within 60 days after issuance of the acceptance review. The publicly available RAI database is unique to Conversion reviews and is discussed in Section 4.4.

4.3.1 Initial Oath or Affirmation Submittal

The submittal for each TS section is typically broken down for each LCO as follows:

- CTS contains the markup of changes
- Discussion of Changes (DOC) – categorizes each CTS change
- ISTS contains the markup of changes
- ISTS Justification for Deviation – discusses why the ISTS model was not adopted (not required)
- ISTS Bases contains the markup of changes
- ISTS Bases Justification for Deviation - discusses why the ISTS model was not adopted (not required)
- Specific No Significant Hazards Determination (NSHD)

The DOC Table typically has the following five categories of changes:

- Administrative (A) - Changes to the CTS that do not result in new requirements or change operational restrictions and flexibility.
- More Restrictive (M) - Changes to the CTS that result in added restrictions or reduced flexibility.
- Less Restrictive (L) - Changes to the CTS that result in reduced restrictions or added flexibility are usually divided into “Categories.” Depending on the types of changes, “Category” titles can differ from one ITS Conversion to another.
- Removed Details (LA) - Changes to the CTS that eliminate detail and/or relocate the detail to a licensee-controlled document. Typically, this involves details of system design and system description including design limits, description of system operation, procedural details for meeting TS requirements or reporting requirements, and cycle-specific parameter limits and TS requirements redundantly located in other licensee-controlled documents. LAs are usually divided into sub-categories known as “Types.” Depending on the types of changes, “Type” titles can differ from one ITS Conversion to another.
- Relocated Specifications (R) - Changes to the CTS that relocate LCO requirements that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii).

The submittal will also contain a generic NSHD. The submittal may contain regulatory commitments, license conditions, and a list of identified items which may require a formal technical branch review.

An example of a previous ITS Conversion amendment submittal can be found in ADAMS (ADAMS Accession No. ML072200448). The intent of the example is only to demonstrate the layout of a typical ITS Conversion amendment.

4.3.2 Information Not Provided Under Oath or Affirmation

Historically, the licensee has also initially provided searchable, MS Word or Adobe Acrobat versions of:

- Clean typed ITS and ITS Bases
- CTS and CTS Bases
- Updated Final Safety Analysis Report
- DOC Tables (MS Word file)

These items are not provided under oath or affirmation but are provided for NRC reviewer benefit. The NRC reviewer is responsible for ensuring that any information used in making a decision is submitted under oath or affirmation or available on the docket.

DOC Tables are used during the write-up of the SE. The MS word file of the DOC Table is a summary version of the DOC Table that is in the formal application. STSB reviewers should confirm the acceptability of the MS word file or re-write as needed during the review.

4.3.3 Acceptance / Initial Review Meeting

Approximately 30 days from the submittal, a meeting with the licensee should be conducted to discuss any potential impacts to the schedule due to issues found during the Acceptance / Initial Review Period.

If an item is identified during the review process that may require significant or formal participation of a technical branch, and this item was not self-identified in the submittal, the licensee should be informed prior to engaging a technical branch. This courtesy is provided to allow the licensee to decide whether or not to pursue the issue in light of the potential schedule or cost impact they may incur.

4.4 Main Review

The main review is a continuation of the review started in the acceptance phase. It consists of the NRC reviewing the entire application and having all initial RAIs drafted. A timeframe of 5 months is typically scheduled for the main review. The review of the ITS Conversion amendment and the development of RAIs is similar in nature to other amendments processed by the NRC. One big difference is that the “in-scope” changes are typically only reviewed by STSB staff. Information resources available to support the review include, but are not limited to:

- 10 CFR 50.36
- ISTS
- CTS
- Updated Final Safety Analysis Report
- NRR Office Instruction on the license amendment review process
- Regulatory Guides
- Standard Review Plans

- Informal communications with technical branch staff
- Communications with licensee via PM for obtaining clarification

During the review, regular communications are vital. This includes communications between the STSB lead reviewer, the DORL PM, and the relevant technical branches, as well as between NRC staff and the licensee's team. For example, a weekly teleconference should be established to allow early communication of schedule issues, and clarifications or notification of technical issues that may be, or have been, issued as questions or RAIs.

For complex issues, a site visit may facilitate discussions between cognizant NRC technical reviewers and licensee staff and allow a focused effort on, and improved mutual understanding of, the issues of concern to the NRC staff. This may be either at NRC or licensee facilities. Since these working sessions are typically used to clarify or explain material already on the docket, they may not need to be public meetings. The decision on whether the meeting should be public or not should be made after consultation with the DORL PM.

4.4.1 RAI Communications & Use of an ITS Database

All RAIs developed should reference applicable regulatory criteria and/or provide the technical basis for the question. If applicable, RAIs should discuss the ITS proposal with regards to the CTS and the ISTS.

For previous ITS Conversions, RAI-like communications between the NRC and the licensee have taken place in an ITS database that was accessible via a licensee controlled, publicly available, external website. Although use of the ITS database is not required, when used properly, it can facilitate the flow of communications and thereby reduce scheduling time. Licensee communications on the ITS database are not done under oath or affirmation. As a result, after all issues are resolved, the licensee will submit the exact contents of the database to the NRC under oath or affirmation. Any teleconference communications with the licensee that are pertinent to RAI resolution should be captured in the database discussions. Before taking part in an ITS Conversion, training should be provided to the NRC staff on how to use the ITS database. This training is typically provided by the licensee and discusses how to navigate the site.

Although the ITS database provides an alternate way for communications, all dialog is immediately available to the public, and will eventually be placed on the docket (when submitted under oath and affirmation by the licensee). As a result, both the licensee and NRC staff should treat the database with some formality (i.e., do not communicate anything that would not normally be communicated in a RAI or RAI response). RAIs written by NRC staff must be approved by an NRC supervisor before being placed in the ITS database.

In order to minimize the overloading of NRC and licensee resources, RAIs should be posted on the ITS database as soon as they are available, rather than in batches as a TS Section is completed. Goals are for the licensee to provide a RAI response within 2 weeks and for NRC reviewers to process responses within 2 weeks. Both parties should inform each other if the

2 weeks is likely to be exceeded. Status of these items is a frequent topic at the weekly teleconference call.

ITS database items, including the original question, and one or several rounds of responses, should be annotated and closed out by NRC staff when the licensee provides an acceptable response. The licensee should provide a mark-up of proposed changes with the database item before it is closed out by NRC staff. After closeout, if the issue needs to be revisited, a new item can be opened. The licensee should be kept informed of such actions.

A RAI in the database should be elevated to a written formal RAI if:

- Dialogue on an issue has exceeded 3 iterations and the reviewer believes that resolution via the database process is unlikely, or
- If, after even the first response, the reviewer believes that, due to the nature of the response, resolution is not likely in a timely manner.

An example of ITS database items that have been submitted under oath or affirmation after issues have been resolved can be found in ADAMS (ADAMS Accession No. ML081430105). In some of these documents, database items that include an initial question and subsequent replies have been referred to as “threads”.

The Notice of Consideration of Issuance of Amendment to Facility Operating License, Proposed No Significant Hazards Consideration Determination, and Opportunity for a Hearing should be published with instructions on how members of the public can access the RAI database.

4.5 Issue Resolution & Submittal of Revisions

After the main review is complete and all initial RAIs have been posted, the focus of the ITS Conversion involves resolving remaining issues. This portion of the schedule is the most volatile and typically needs to be managed closely. A goal is to have all issues resolved within 4 months after completing the main review.

In order to reduce scheduling time later in the ITS Conversion, any SE inputs needed from technical branches can be provided to the DORL PM as specific issues are closed out. STSB staff should be cognizant of technical branch SE inputs and should be aware of any new issues that may invalidate the SE.

Once all RAIs are resolved, the licensee should:

- Submit all revised submittals under oath or affirmation.
- Submit the exact contents of the ITS database under oath or affirmation.
- Submit revised DOC Tables.

The items should be submitted as each TS Section is closed out. The revised submittals should contain a table that provides a summary of all changes. The summary should reference the applicable ITS database items, as well as how the

revision relates to the ITS database discussions (e.g. no change, editorial, new regulatory/technical change etc.). Without this table, there will likely be a delay in the schedule due to the need of a more detailed verification of the revised submittal.

- Example of editorial change: There is an ITS database item discussion on LCO 3.4.5 and the item is closed out with expected revision changes. Due to resolutions in other items, the LCO will now need to be renumbered as LCO 3.4.4. The revised submittal should classify the change from the ITS database item as editorial with discussion of why the change occurred. Note: Revisions to writing for the purpose of clarifying intent are not necessarily editorial changes.
- Example of regulatory/technical change: There is an ITS database item discussion with an expected revision change that states an LCO is applicable in Modes 1, 2, and 3. However, when the actual revision is submitted, the LCO will now only be applicable in Modes 1 and 2. The revised submittal should classify this as a new regulatory/technical change. The revised submittal should provide regulatory and technical justification as well as why the change occurred.

The licensee should be informed that the addition of new regulatory/technical changes in revised submittals is highly discouraged by the NRC. New changes may need to go back to technical branches for formal review and can greatly impact the schedule. Prior to a revised submittal, if the licensee desires a change after an item is closed out, or desires a completely new change, the NRC staff can create a new item to facilitate such discussions. The licensee should be aware that this too can impact scheduling; however, it is the preferred method when compared to providing new regulatory/technical changes in a revised submittal.

The revised submittals should also explicitly state if a commitment or a condition has been added, modified, or deleted. This information will be needed for the NRC SE.

4.6 SE Write-Up

STSB is responsible for drafting the “in-scope” portion of the SE. The “in-scope” portion of the SE can be drafted by the STSB lead reviewer or other STSB members:

- Provide confirmation that the DOC Tables are acceptable.
- Provide confirmation that revised submittals are acceptable (i.e., TS Section closed out and all issues resolved).

The DORL PM will consolidate other portions of the SE that are not directly related to the “in-scope” evaluations. This includes SEs provided by other technical branches. STSB staff should inform the DORL PM if technical branch SEs are no longer applicable due to revised submittals.

- Example: Licensee proposed a change that was different from the CTS and ISTS. The technical branch accepted the change and drafted a SE during the

issue resolution phase. However, when the revision was submitted, the licensee decided to go with the ISTS.

The DORL PM will also arrange for a panel of senior project managers to conduct a review of the summary DOC Tables that will be included as part of the STSB SE. The purpose of this review is to provide an independent confirmation that the changes are appropriately categorized (i.e., Less Restrictive, Administrative, etc.). This is important because the structure of the Conversion SE provides for the approval of changes by category, rather than individually.

An example of an ITS Conversion SE can be found in ADAMS (ADAMS Accession No. ML082900616).

4.7 Capturing Lessons Learned

After each ITS Conversion, the STSB PM should consolidate any lessons learned. Consideration should be given to updating this Office Instruction to reflect any lessons learned or incorporating the lessons learned into an Appendix of this Office Instruction.

5. **RESPONSIBILITIES AND AUTHORITIES**

Responsibilities and authorities listed in the NRR Office Instruction on the license amendment review process applies to ITS Conversion amendments. This Office Instruction lists additional responsibilities and authorities for ITS Conversion amendments. Clarification of the DORL PM and STSB lead reviewer roles are also provided.

DORL PM

- Responsible for the overall ITS Conversion effort.
- Responsible for the coordination of any meetings with the licensee.
- Responsible for Work Planning processing.
- Responsible for convening a DORL PM panel to review DOC Tables.

STSB Lead Reviewer

- Interfaces with DORL PM by coordinating STSB efforts.
- Drafts the STSB SE based on input from STSB reviewers.
- Documents any lessons learned and provides updates to the primary contact of this Office Instruction, as needed.

STSB Reviewers

- Assists in the Work Planning processing.
- Conducts review of entire in-scope application.

Technical Branch Reviewers

- Conducts formal review of items and provides SE input as requested by DORL PM.
- Provides informal assistance to STSB reviewers, as requested by STSB.

Office of the General Counsel (OGC)

- Responsible for review of amendment package for legal adequacy and defensibility. Refer to the NRR Office Instruction on NRR interfaces with the OGC for further details regarding OGC review.

6. PERFORMANCE MEASURES

None

7. PRIMARY CONTACT

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8. RESPONSIBLE ORGANIZATION

DSS

9. EFFECTIVE DATE

January 28, 2020

10. CERTIFICATION DATE

January 28, 2025

11. REFERENCES

- Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, July 22, 1993 (58 FR 39132)
- NEI 96-06, "Improved Technical Specifications Conversion Guidance" (ADAMS Accession No. ML070810523)
- NRC Administrative Letter 96-04, "Efficient Adoption of Improved Standard Technical Specifications" (ADAMS Accession No. ML031110087)
- LIC-101, "License Amendment Review Procedures"
<https://usnrc.sharepoint.com/teams/NRR-OI-Listing/Lists/OI%20Listing/AllItems.aspx>
- LIC-109, "Acceptance Review Procedures"
<https://usnrc.sharepoint.com/teams/NRR-OI-Listing/Lists/OI%20Listing/AllItems.aspx>

Enclosures:

1. Appendix A - Items that May Require a Formal Technical Branch Review
2. Appendix B - Change History

Appendix A - Items that May Require a Formal Technical Branch Review

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Improved Technical Specification Conversion Amendment Review Procedures

Items which may require a formal technical branch review, which are identified by Technical Specifications Branch (STSB) staff rather than by the licensee in the Conversion submittal, can potentially impact the schedule. This is due to the need for formal technical branch engagement late in the main review phase.

The following items are examples of changes that may require a formal technical branch review. Typically, the licensee should identify these items in the initial submittal. Examples are listed for demonstrative purposes only.

1. Improved Technical Specifications (ITS) that are different from current Technical Specifications (CTS) and Improved Standard Technical Specifications (ISTS) (regardless of reasoning or extent of modification). This type of change has historically been referred to as a "Beyond Scope Item" or BSI.

Example: Both the CTS and the ISTS contain limiting conditions for operations (LCOs) for Reactor Trip System (RTS) Instrumentation. The licensee is proposing to delete RTS from the ITS.

2. Modification of ITS Bases in such a manner that application of Technical Specifications (TS) may be affected (i.e., discussions on Operability, modification of generic ISTS Bases discussion, etc.)

Example #1: CTS states that for Applicable Modes, 2 channels per bus (4 total channels) shall be operable for the Emergency Diesel Generator (EDG) Loss of Power Start (LOPS) instrumentation. The CTS Bases do not provide any additional discussion on what constitutes an operable channel. The ITS contains the same CTS statement, however the ITS Bases defines an operable channel in a manner that is inconsistent with the Updated Final Safety Analysis Report (UFSAR) design. The ISTS cannot be used as a reference since it is based on a different design (i.e., 3 channels per EDG).

Example #2: The CTS, ITS, and ISTS contain a Surveillance Requirement (SR) for calibration of the Source Range Neutron Flux instrumentation. The wording in the CTS, ITS, and ISTS is the same. The CTS Bases and the UFSAR do not provide any additional discussion on the SR. The ISTS Bases discussion states "For source range neutron flux channels, Channel Calibration is a complete check and readjustment of the channels from the **preamplifier input** to the indicators." The ITS Bases modifies this discussion to state "For source range neutron flux channels, Channel Calibration is a complete check and readjustment of the channels from the **RPS Cabinet input** to the indicators." The ITS Bases modification was done to clarify that the SR would not require testing of the preamplifier.

3. Adoption of ISTS or any Technical Specifications Task Force (TSTF) Traveler that requires a plant-specific analysis (i.e., adoption of term "recently irradiated fuel" in TSTF-51/ISTS, probabilistic risk assessment analysis in TSTF-411/418/ISTS, etc). The appearance of a

bracketed term “[]” can be an indication that plant-specific analysis is needed. For plant-specific analysis that already exists, formal technical branch review may still be needed to verify that the analysis is applicable to the TS in question.

Example: The CTS states that the Containment Ventilation Isolation instrumentation needs to be operable during the movement of **irradiated** fuel within the containment. The ITS proposes that the Containment Ventilation Isolation instrumentation needs to be operable during the movement of **recently irradiated** fuel within the containment. The ISTS states, in part, that the Containment Ventilation Isolation instrumentation is applicable during movement of [recently] irradiated fuel within the containment. A plant-specific analysis, in this case, is performed and reviewed for adoption of the term “recently.”

4. Adoption of TSTF Travelers that have not been incorporated into the latest ISTS revision and require formal technical branch review (can usually be identified by the lack of a Consolidated Line Item Improvement Process model SE or the need for evaluation of plant-specific information).
5. Partial adoption of any TSTF Traveler (i.e., not adopting conditions/commitments in TSTF Traveler).

Example: The licensee proposes to adopt the “recently” irradiated fuel term in the ITS. The use of the term “recently” irradiated fuel is associated with TSTF-51 and is incorporated into the ISTS, Revision 3.0. TSTF-51 contained regulatory commitments associated with adoption of the term “recently” irradiated fuel. The licensee does not propose to adopt any of the commitments associated with TSTF-51.

6. ITS attempts to adopt ISTS when ISTS may not apply due to the plant-specific UFSAR (i.e., deleting CTS simply because it is not found in the ISTS). The ISTS is a model and the ITS should reflect the design of the facility. These types of changes should not be proposed by the licensee.

Example: In the Emergency Feedwater (EFW) CTS, there is a SR associated with the EFW Automatic Level Control System. The UFSAR states that the level control system is required for mitigation of an accident. The EFW ISTS do not contain any SR associated with an EFW Automatic Level Control System. The licensee proposes to delete the EFW Automatic Level Control System SR from the CTS with the main justification being that the SR was not found in the ISTS.

The following items are changes that would likely require a formal technical branch review. The licensee may not foresee these issues (i.e., not expected to identify). Examples are listed for demonstrative purposes only.

1. The ITS retains portions of the CTS that deviate significantly from the ISTS, and the licensing basis is unclear in terms of technical evaluation/regulatory compliance. When contentious issues with CTS retention cannot be resolved, resolution has typically been to have the ITS reflect the CTS (i.e., only an administrative format change occurs for the TS LCO in question).

Example #1: The CTS state that the control room emergency ventilation is required to be operable during power operations and during movement of irradiated fuel in the reactor building. The ITS proposes that the control room emergency ventilation should be operable during power operations and during movement of recently irradiated fuel in the reactor building. The UFSAR states that the control room emergency ventilation is needed to mitigate the consequences of a Loss of Coolant Accident (LOCA). Neither the CTS nor the ITS contain requirements that the control room emergency ventilation be operable during Hot Shutdown. Accordingly, formal technical branch review would be needed to determine if the control room emergency ventilation is required to be operable during Hot Shutdown. For equipment needed to mitigate the consequences of a LOCA, the ISTS typically has operability requirements in Hot Shutdown.

Example #2: The CTS state that if the control room emergency ventilation is made or found to be inoperable for any reason, reactor operation or **refueling operations** is permissible for seven days, after which the reactor shall be placed in Cold Shutdown within 36 hours and refueling operations must be terminated within 2 hours. For the plant in question, due to plant specific designs, this could lead to a potential loss of safety function during these time periods. As a result of modifying the LCO, the ITS proposed to modify the remedial action by replacing the term “refueling operations” with **“recently irradiated fuel handling, irradiated fuel cask handling, and Operations with the Potential to Drain the Reactor Vessel (OPDRV).”** The completion times associated with an inoperable control room emergency ventilation were maintained. For two inoperable control emergency ventilation systems (complete loss of safety function), the ISTS has actions to immediately shutdown and cooldown in accordance with ISTS LCO 3.0.3 (exceptions to this are listed for inoperability due to the control room envelope boundary) and immediately suspend movement of fuel assemblies. Formal technical branch review would be needed, in this case, to determine the acceptability of the ITS proposed alternative.

2. ITS proposes to adopt the ISTS, however, new issues associated with ISTS have been identified. This usually occurs as a result of new staff members looking at ISTS and identifying potential issues that were not considered before.

Example: TSTF-360 contains provisions for Electrical DC Systems and was incorporated into the ISTS. The technical branch identified issues with TSTF-360 / ISTS.

Appendix A - Change History

Office Instruction LIC-601

Improved Technical Specification Conversion Amendment Review Procedures

LIC-601 Change History - Page 1 of 1			
Date	Description of Changes	Method Used to Announce & Distribute	Training
06/14/2012	Initial issuance. The objective of this office instruction is to define the process for review of Improved Technical Specification Conversion Amendments.	E-mail to all NRR staff	Required reading for STSB staff, DORL project managers, and other technical staff prior to engaging in technical specification conversion activities.
01/28/2020	This issuance of LIC-601, Revision 1, "Improved Technical Specification Conversion Amendment Review Procedure," establishes the new format, removes incorrect ADAMS hyperlinks, updates primary contact information, and includes minor edits to improve clarity.	E-mail to all NRR staff	None