

August 20, 1985

MEMORANDUM FOR: Themis P. Speis, Director
Division of Safety Technology, NRR

FROM: Don H. Beckham, Director
Technical Specification Improvement Project
Division of Safety Technology, NRR

SUBJECT: MEETING ON TECHNICAL SPECIFICATION IMPROVEMENT
WITH PUBLIC INTEREST GROUP MEMBERS

TSIP program plan includes discussions with public interest groups about its efforts to improve Technical Specifications (TS). The objective for such discussions is to obtain information in pursuit of TS improvement. Members of TSIP, Dick Hoefling, Sam Bryan, and myself met with Ms. Billie Garde, Government Accountability Project; Ms. Ellyn Weiss of Harman, Weiss, and Jordan; and Mr. Steven Sholly, Union of Concerned Scientists, on August 6, 1985 for discussion of the project. They were given copies of the TSIP Program Plan and a draft copy of our Interim Report "Technical Specification Problems" in advance of the meeting. The meeting lasted about three hours.

I discussed the project status and covered the findings to date. Following my discussion, several questions were asked about the Plan and Interim Report. We provided additional information and noted the sections in which our meaning was not clearly stated. We asked for comments on our approach and methods to improve TS.

The basic concerns identified were:

1. Efforts to reduce Technical Specifications are viewed by Ms. Garde as a diminution of the regulatory control over licensee activities. Even though she recognizes that processing IS of lesser importance can impact staff efficiency and that specifications removed from TS will still have some regulatory status and can be enforced, she opposes this change. However, she supports efforts to clarify TS and improve their bases. Ms. Weiss agreed.
2. Ms. Weiss also questioned if there was a balancing in our determinations of whether research in areas such as seismic margins, human factors, maintenance, surveillance programs, source term, severe accident sequences and pipe failure mechanisms could significantly reduce the need for TS, as stated in our program plan, against a similar effort to determine whether some TS may need to be added or strengthened. We stated that we believe her concerns are implicitly addressed, for example, as suggested by our technical assistance contractor, application of the leak-before-break pipe failure principle should result in the need for strengthening leak rate detection sensitivity. TSIP has seen the need to address not only consecutive equipment outage time but also cumulative equipment outage time.

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3. Mr. Sholly believes that draft industry criteria based on DBA for what TS should contain ignores several years of experience, which, he believes, points toward the need for a reliability and risk based program.

Ms. Weiss expressed an interest in our program and indicated the desire to receive contractor reports and some of the correspondence including our trip reports. We agreed to provide this information if she would identify her interests.

We believe the meeting was constructive and beneficial to us. In general, the meeting participants agreed with the need to improve TS, especially bases to improve clarity, and to the link with the safety analysis. Although the program plan was observed to be typical of plans for resolving problems, it appeared reasonable to the group. We obtained some good comments. For example, they recommended that TSIP examine the need for prohibiting removal of safety equipment from service when certain other safety equipment is already out of service if their combined removal greatly increases risk as identified in evaluating PRA cut sets.

We offered to discuss with them any concerns that may arise from their review of our project activities.

(S) D.H. Beckham

Don H. Beckham, Director
Technical Specification
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Division of Safety Technology, NRR

cc: H. Denton, NRR
E. Weiss, UCS
S. Sholly, UCS
B. Garde, GAP
TSIP Members
TSAG Members

Distribution:

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