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NUCLEAR REGULATORY COMMISSION

In the matter of:

COMMISSION MEETING

Briefing on Status
of Task Force on
Technical Specifications

(Public Meeting)

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1625 I St., N.W.

Suite 921

Washington, D.C. 20006

(202) 293-3950

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1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

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4 BRIEFING ON STATUS OF TASK FORCE ON
5 TECHNICAL SPECIFICATIONS

6 - - -

7 Public Meeting

8
9 Tuesday, January 21, 1986

10 Room 1130

11 1717 H Street, N.W.

12 Washington, D.C.

13
14 The Commission met in open session, pursuant to
15 notice, at 2:05 p.m., the HONORABLE NUNZIO J. PALLADINO,
16 Chairman of the Commission, presiding

17
18 COMMISSIONERS PRESENT

19 NUNZIO J. PALLADINO, Chairman of the Commission

20 JAMES K. ASSELSTINE, Member

21 FREDERICK M. BERNTHAL, Member

22 THOMAS M. ROBERTS, Member

23 LANDO W. ZECH, JR., Member

24

25

1 STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:

2 S. Chilk M. Malsch

3 H. Denton V. Stello

4 E. Hatcher F. Baranowsky

5 S. Bryan

6 AUDIENCE SPEAKERS:

7 R. Vollmer

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P R O C E E D I N G S

CHAIRMAN PALLADINO: Good afternoon, ladies and gentlemen. This afternoon we are meeting with members of the staff to discuss their recommendations for improving technical specifications. Plant technical specifications have evolved over many years, and at this time there is general staff and industry agreement that improvements should be considered.

In 1982, the NRC proposed a change to 10 CFR 50.36, and in August 1983, the EDO established the Task Group on Technical Specifications. More recently, in December 1984 a Technical Specification Improvement Project, TSIP, was established to reconsider the entire subject of technical specifications and to provide recommendations for improvement.

On January 13, 1986, the acting EDO forwarded SECY 86-10, Recommendations for Improving Technical Specifications. This is the result of a TSIP effort as well as the significant contributions made by the Atomic Industrial Forum. I understand that copies of this policy paper are available on the table in the back of the room.

Among other things, SECY 86-10 recommends that the staff proceed now with the development of a Commission policy paper on technical specifications, and to proceed with rulemaking at a later date. However, as I understand the situation, AIF would prefer that rulemaking be undertaken now.

A discussion of the pros and cons of each approach

1 would be useful. I believe that a main objective of today's
2 meeting is to obtain enough information for the Commission to
3 decide whether the staff should now proceed with a proposed
4 policy or with rulemaking or some other option, if any member
5 has an option to suggest.

6 Do any of my fellow Commissioners have any
7 additional opening remarks at this time?

8 [No response.]

9 CHAIRMAN PALLADINO: All right. Then let me turn
10 the meeting over to Mr. Stello.

11 MR. STELLO: Thank you, Mr. Chairman. The issue of
12 improving the process by which we issue tech specs and the
13 whole issue of tech specs has been with us for quite some
14 time, and it's been recognized as an area where we clearly
15 want to do better, and I think recognize the need to do
16 better. Part of what you'll hear today will include the
17 background and summary of how we got to the point, and
18 Mr. Denton will get into that in a minute.

19 I wanted to make sure that it's clear that this is
20 only one aspect of our going back and looking into the
21 regulatory process and trying to decide areas such as this one
22 where we can do better, and indeed we're committed to do that
23 wherever we can.

24 This particular activity is one for which there
25 obviously was a need to get industry involvement, and as

1 you've correctly pointed out, the Atomic Industrial Forum has
2 spent considerable effort in this program. I understand that
3 they have asked the Commission to come forward and have some
4 views that they would like to offer, and perhaps that could be
5 arranged for the future.

6 I think it's interesting that usually, the industry
7 has a view that we ought not to issue a rule but rather, to
8 issue a policy statement. In this case it is reversed, and
9 they probably have some good reason. I think it's important,
10 though, to recognize they are not opposing issuing the policy
11 statement, and Mr. Denton will get into that a little bit more
12 in a minute.

13 Our plans are to go forward in the near future and
14 discuss this program with the ACRS, and we plan on doing that,
15 and I don't believe a date has been set yet but we expect to
16 be able to do it in the next couple of months, I would assume.

17 With that, let me turn the meeting over to
18 Mr. Denton to give you some of the background of how we got
19 where we are today.

20 MR. DENTON: We have at the table today Ed Butcher
21 on my left who is Chief of the Tech Spec Branch and will be
22 making a lot of the presentation. Pat Baranowsky from
23 Research to Vic's right, and Sam Bryan who will be
24 participating in the presentation also.

25 Going back to the early days of regulation, we used

1 to hold the licensee to the entire submittal, and he couldn't
2 change anything in the plant that had been put in the
3 application without amending the license. It was recognized
4 about 20 years ago that that became extremely burdensome, and
5 that's when we adopted the present approach to tech specs.

6 There's been a lot of accretion of adding things to
7 tech specs in the decades that are past, and we'll be getting
8 into those details. But I formed this task force on tech
9 specs about a year ago probably because of three main
10 reasons. One was the Sholly legislation. That made it
11 increasingly difficult to correct unintentional impacts of the
12 tech specs easily. With Sholly, everything is much more
13 formal and rigorous and you have to notice it. Before that,
14 we had a little flexibility to make changes.

15 Another thing we've come to realize is that tech
16 specs were no longer oriented as much as we felt they should
17 be towards human factor aspects. Originally, the idea was
18 tech specs would be on process variables, those things under
19 the direct control of the operator and things in which you
20 would not want the plant making changes without Commission
21 approval. Plus, we were beginning to see from the rRAs and
22 other technical work that was being done that we hadn't
23 necessarily selected the proper surveillance intervals and
24 limiting conditions for operation and these sorts of things.

25 So we formed a committee to work full time. They

1 delivered their product on time in September, and we'll give
2 you some of the results of that. We also formed an advisory
3 committee to follow that and to advise them, and that
4 committee included people like Glenn Reed from the ACRS who
5 has extensive operating experience. So I've been very pleased
6 with the results of this effort. Industry has been heavily
7 involved.

8 This effort is a little bit different than the
9 effort to improve tech specs in general. You remember after
10 Grand Gulf and some of those debacles we have gone to a
11 process of improving the quality of the tech specs per se. In
12 that area, we do now require the utility to certify tech
13 specs, we have regional inspections of the as-built plant, we
14 have a contractor in many cases review the application versus
15 the tech spec, and we get focused management attention on tech
16 spec.

17 We're not going to talk about those aspects today;
18 we're going to talk about more what should be the boundary in
19 the tech specs; where should that boundary be between the
20 things that a licensee is permitted to change without coming
21 to the agency for amendment, and those which he should change
22 only after our review and approval.

23 So with that introduction, Ed, why don't you
24 proceed. We have about 14 slides to cover today.

25 MR. BUTCHER: I'll start off and fill in a little

1 bit more detail on the history of the development of technical
2 specifications and where they came from.

3 [Slide.]

4 The tech specs actually find their genesis right in
5 the Act itself. The Act established specific requirements for
6 which information within the application should be considered
7 technical specifications, and I'll quote directly from the
8 Act. The Act states that, "Technical specifications shall
9 include the amount, kind and source of special nuclear
10 material required; the place of use; the specific
11 characteristics of the facility and such other information as
12 the Commission by rule or regulation deems necessary."

13 In 1956, the Commission published its early
14 regulations on technical specifications, and the effect of
15 50.36 was merely to codify the requirements of the Act. There
16 was very little additional information published, or
17 additional detail on the content of technical specifications.

18 In 1962, it became aware -- the period between 1956
19 and 62 -- that it was necessary to be more specific about
20 which specific parts of the application should be considered
21 technical specifications. And at that time, the Commission
22 amended 50.36 and published Appendix A, which provided details
23 on the specific requirements to be considered technical
24 specifications; the specific elements of the plant design.

25 This Appendix A I guess could be considered a

1 forerunner of today's Appendix A, the General Design Criteria.

2 The Commission still did not, in 1962, require that
3 technical specifications be incorporated in a separate
4 document. At that time, the entire Hazards Analysis Report
5 was still considered the technical specifications.

6 The first point at which it was determined that
7 technical specifications ought to have a separate status of
8 their own from the application was in 1968 when 50.36 was
9 again amended to make the technical specifications a separate
10 document. As Harold mentioned, up until this point, virtually
11 any change to the plant design could be interpreted as
12 requiring a technical specification or license amendment.

13 The specific -- 50.36 sets forth specific elements
14 which must be included in the technical specifications, and
15 you can see them listed there on the slide.

16 The next major action in the development of
17 technical specifications occurred in 1974.

18 [Slide.]

19 It became clear after the amendment to 50.36 in 1968
20 that an awful lot, a large amount of staff resource was going
21 in to developing this separate document which was called
22 Technical Specifications, and it was determined that in order
23 to simplify this process and gain some uniformity in the
24 industry, standard technical specifications for a given
25 reactor design would be developed. And they were developed

1 in 1974. In large measure, the industry developed those
2 proposals and they were submitted to the staff and the staff
3 reviewed them and changes were made accordingly, and we
4 finally published and issued standard technical specifications
5 for each of the reactor designs.

6 The significant features of those documents, those
7 standard documents, were that the meat of the specification
8 and those parts of the document which we are interested in
9 focusing our attention on now for making improvements lies in
10 four areas.

11 The limiting conditions for operation -- the
12 limiting conditions for operation are those specific
13 conditions which are placed upon plant operation in terms of
14 the minimal number of systems which must be operable, minimal
15 numbers of trains that must be operable. It defines the
16 complement of equipment which must be operable in the plant in
17 order to continue its operation.

18 The action statements define what one must do when
19 he cannot meet the limiting conditions for operation. Many
20 times that involves a reduction in power or shutting the
21 reactor down.

22 The surveillance requirements are simply the
23 testings which must be done on a periodic basis to verify that
24 the equipment is, in fact, operable.

25 And of course, the bases ties the whole thing

1 together, provides the technical rationale that goes into
2 establishing the specific limiting conditions for operation,
3 action statements and surveillance requirements.

4 In 1979, there was I guess what could be
5 characterized today as a major policy statement on the intent
6 and purpose of technical specifications. I'm not so sure that
7 it was recognized at the time that the board decision was
8 made, but upon careful reflection it has turned out to be a
9 fairly profound statement of the intent and purpose of
10 technical specifications.

11 You can see the ruling on the slide. It was -- this
12 ruling was made in connection with a specific license
13 amendment on the Trojan plant in connection with the spent
14 fuel pool expansion, but it has universal applicability. I
15 will read it; it's quite a significant statement.

16 "The technical specifications are to be reserved for
17 those matters as to which imposition of rigid conditions and
18 limitations upon reactor operation is deemed necessary to
19 obviate the possibility of an abnormal situation or event
20 giving rise to an immediate threat to the public health and
21 safety." The key words there are "rigid conditions and
22 limitations upon reactor operation" and "immediate threat."

23 With this statement, the concept of the technical
24 specifications being, in effect, a contract between the
25 utility and the NRC on how the plant will be operated was

1 brought forth.

2 Having gone through the history of how we got from
3 the beginning to where we are in tech specs now, it's
4 appropriate to focus on what the net effect of this
5 development process has been.

6 COMMISSIONER ASSELSTINE: Before you leave this one,
7 let me ask you, is that really the end point in your view?
8 Was there any change after TMI in terms of the emphasis of
9 what should be in tech specs, expanding the number of items
10 that ought to be included in tech specs? And if so, what was
11 the basis for that?

12 MR. BUTCHER: I think this slide will give some
13 indication of the effect.

14 COMMISSIONER ASSELSTINE: I agree with you, the
15 slide talks about the effect. I guess what I'm interested in
16 is the cause and the rationale.

17 MR. BUTCHER: There were many of the action items in
18 the -- I guess you could characterize them as -- new staff
19 requirements which came out of the information that was
20 learned from the TMI accident that found their way into
21 technical specifications. And that, in combination with the
22 changes for the fire protection program, we would have to say
23 represented a major increase in the number of technical
24 specifications.

25 COMMISSIONER BERNTHAL: Well nevertheless, if you

1 look at your number there, it would appear that the major
2 change pre-dated TMI, both on LCO's and surveillance tests.

3 MR. BUTCHER: That's correct, there was a major
4 change. You can see that there was another substantial change
5 between 1977 and 80 which is the timeframe of TMI.

6 COMMISSIONER BERNTHAL: But there you're talking
7 about maybe a 25 to 30 percent, 35, whatever it is, change;
8 whereas before, you're looking at a change that's 20 or 30
9 times between 1972 and 1977.

10 MR. BUTCHER: I guess you would have to say there
11 were probably two major events; the advent of standard
12 technical specifications and the TMI accident, which were
13 principal contributors.

14 [Slide.]

15 These statistics here are pretty impressive in terms
16 of particularly the surveillance burden that has grown over
17 the years and as we have progressed through the development of
18 technical specifications. There are other examples which
19 people have done -- informal surveils of various older plant
20 designs with tech specs versus the new ones -- and they all
21 bear out these sorts of increases in the requirements.

22 CHAIRMAN PALLADINO: Coming back to Commissioner
23 Bernthal's question, what caused the tremendous increase
24 between 1972 and 77 as opposed to a more modest increase
25 between 1977 and 80.

1 MR. DENTON: Let me try to answer that. One reason
2 is the plant has gotten more complex. The early plants like
3 Big Rock Point and Dresden were fairly simple, and I think the
4 staff interpreted the need for control to sort of be a minimum
5 set. And so we tended to concentrate on don't exceed a
6 certain pressure in the pressure vessel design pressure, the
7 ASME sort of requirements, and did not have a lot of detailed
8 requirements for many systems.

9 I think the regulatory staff grew during this period
10 and there were conflicts developing between how do you -- what
11 was the real meaning of a tech spec. So in some cases, the
12 industry wanted to make a more exact board citation, and in
13 some cases the staff wanted to make them more exact to pin the
14 licensee down. I don't think there is any single cause, and
15 that's why I used the word "accretion."

16 I think every set tended to get a little more
17 complex than the last one with all sides trying to carry out
18 their best judgment on what was required. And so they kind of
19 crept from 30 pages to 40 pages to 60 pages, and everyone now
20 realizes, looking back, that many of the fundamental safety
21 parameters we were trying to control may be obscured by giving
22 attention to some of the lesser important issues.

23 CHAIRMAN PALLADINO: Was there a basic change in
24 philosophy? Because I thought when the tech spec got started
25 that the intent was just to keep to maintaining, as you said,

1 a minimum number of parameters as being specified in the tech
2 specs. Whereas, as the years went by, apparently others
3 thought more should be in it.

4 MR. DENTON: I don't think it ever really came to
5 the Commission as a Commission level of attention. I think it
6 was just sort of plant by plant that as everybody got smarter
7 and some of the systems changed to a solid state where you got
8 test them more often, maybe the requirement went in to test
9 things once a week instead of once a month. And everybody
10 said that sounds find.

11 Many of the decisions were made not because we had
12 PRA's or knew exactly what the right decisions were, but
13 because on engineering judgment it sounded like a good test
14 area.

15 COMMISSIONER ASSELSTINE: Harold, is it fair to look
16 at both sides of the coin? When I look at that chart it seems
17 to me it's a fair question to ask: are the numbers of LCO's
18 and surveillance tests for some of the new plants excessive?
19 The 15,000 or 14,000? But it also strikes me as a fair
20 question to ask whether 390 surveillances is adequate for a
21 plant like Surry. Surry is a far cry from Big Rock Point or
22 Dresden 1. You know, I wonder whether both sides of the coin
23 have to be looked at; that is, whether for the older plants,
24 the pre-standard tech spec plants, whether we really have
25 enough in there to give us the assurance that the plant is

1 being maintained and operated in a safe manner.

2 MR. DENTON: It has been pointed out that some of
3 the best-running plants have the skimpiest tech specs, you
4 know, which is another side to that argument that they could
5 devote more time. But it is a question. Just because it is
6 in tech specs or not doesn't really say what the safety of the
7 plant is. If the licensee is conscientious about making
8 changes and doing 50.59 reviews and only making changes that
9 add to safety, then it doesn't matter -- I think what we're
10 talking about here is the degree of regulatory control.

11 And for example, Westinghouse came in probably a
12 year or two ago with a topical report saying our intervals had
13 been set far too short based on modern reliability data and
14 theory, and we ended up agreeing with them. And I think we
15 have changed from weekly to quarterly or weekly to monthly.
16 And sometimes that makes a big change in the numbers, but it
17 might be in systems who are not in those dominant sequences.

18 And I think one of the things I wanted the group to
19 look at here -- two of the things I wanted them to look at --
20 is look at these from the human factors side. They were
21 originally developed more from a design side, not from an
22 input from operational data what was really failing and what
23 was important, and in fact, around these PRA's which showed
24 dominant sequences.

25 And it may well turn out that there are some things

1 that we ought to be covering more tightly, such as
2 containment, for example, and there might be things that we
3 are over-regulating. But clearly, most people think that we
4 should not have put in there snubber inspections. Snubbers
5 are important, but do we really have to have inspecting every
6 snubber in a plant in the tech specs. Can't that be left to
7 some other program that the utility has.

8 So I don't think we meant this to be all-inclusive;
9 they were just samples that just illustrate the growth in tech
10 specs. And I don't think at the Commission level it was ever
11 a conscious policy decision to add more or less; it just kind
12 of grew. And sometimes you recall boards added requirements
13 that had to be tech specs. So there were many different
14 causes.

15 But looking back at it, now they are quite fat and
16 they're much larger than I've seen anywhere else in the world
17 and since regulatory control. And I think what we're going to
18 do about it comes a little later in the presentation.

19 COMMISSIONER ASSELSTINE: Okay.

20 MR. BUTCHER: In an analog sense, I can give you an
21 indication. This is the original tech spec that was issued
22 for San Onofre, and I think it was 1967, and you can get a
23 sense of the size of that. And this is the one for Wolf Creek
24 today. This one I think is printed on both sides, and this
25 one on a single side; it's the difference between 39 pages and

1 some 500 pages. And I'm not sure that there's any evidence
2 that would indicate that San Onofre is operated any less safe
3 than a plant with a 500-page tech spec.

4 COMMISSIONER ASSELSTINE: I think Harold is right.
5 The question is the degree of regulatory control and which
6 aspects you want to maintain that degree of regulatory
7 control.

8 You are right, Harold, if you have a licensee that
9 is very conscientious about its activities and maintaining the
10 PSAR commitments and those kinds of things, then you aren't
11 going to have a problem one way or the other whichever place
12 it's in.

13 The question is: if you rely more heavily on the
14 PSAR commitments and alternative approaches to tech specs,
15 what are you giving up in terms of control, what alternatives
16 do we have to assure ourselves that that approach is going to
17 provide the same high level of compliance that we have with
18 tech specs?

19 MR. STELLO: I would like to make sure that we make
20 the point that there is a genuine safety concern, though.
21 Remember, I think it was Jim Keppler and I can't remember the
22 name of the plant where he mentioned that they had an occasion
23 where they were simultaneously trying to pay attention to 14
24 time clocks that were ticked off by limiting conditions of
25 operation.

1 COMMISSIONER ASSELSTINE: I think it was LaSalle.

2 They have had a lot of those.

3 MR. STELLO: It may have been, okay. Now, you have
4 to ask yourself, when the operating staff of the plant,
5 knowing that should you run into a clock issue you have to
6 take action with the plant, gets preoccupied with worrying
7 about those kinds of activities and distracted from really
8 managing the plant. Where if it weren't because it were in
9 the tech specs they could have done what they needed to do
10 with those particular pieces of equipment in an orderly
11 fashion. But once it's in the license, they no longer have an
12 option, and they've got to adhere to it.

13 So there's a real question as to whether adding that
14 much in terms of requirement is really distracting. The point
15 that Harold has made. People in the control room will have to
16 really worry about operating the plant. So there is I think a
17 genuine concern over making sure that we have used the right
18 tools to accomplish the right purposes. And that's really the
19 bottom line.

20 MR. DENTON: We appointed as the original director
21 of this group Don Beckham. You recall he came out of being
22 Chief of the Operator Licensing Branch, and we wanted a heavy
23 operational flavor since the tech specs really had been design
24 documents, to some extent, and this was our effort to bring in
25 that operational feel for what were they really doing and what

1 were they adding to safety or not adding to safety, in real
2 practice.

3 COMMISSIONER ASSELSTINE: To what extent, Harold --
4 you mentioned the difference in complexity, and you just
5 showed the difference between San Onofre 1 and Wolf Creek.
6 There's a lot of difference in the complexity of those two
7 plants, both size and complexity of the units. And LaSalle
8 has been having the problem with lots of time clocks running
9 at the same time.

10 I get the sense from talking with the licensee that
11 a lot of that is due to the particular design -- the logic
12 that's built into those systems. How much of this is design
13 dependent and complexity dependent; that is, as the plants
14 have grown and become more complex. How much of a contributor
15 has that been?

16 MR. STELLO: I don't think we've tried to determine
17 that. Certainly, in effect, there's increased numbers of
18 systems and complexity and instruments, but I don't we could
19 quantify that. You know it's more.

20 MR. DENTON: And we sent this group off without any
21 instructions as to what to come back with. We said go study
22 the problem, go talk to everybody that knows anything about
23 it, and we really didn't have a preconceived notion except we
24 were kind of uneasy about the growth. So I think what you're
25 getting here is people with their objective view on what to do

1 with the situation.

2 [Slide.]

3 MR. BUTCHER: I'd like to give a little outline for
4 the rest of the presentation, where we're going to go from
5 here. Having been through the history and some summary of
6 what the problem is that's before us, we can consider our
7 overall Technical Specification Improvement Program as a
8 two-phased approach. The first phase, to identify the problem
9 and come up with some recommendations; and the second phase,
10 to begin to implement some solutions to these recommendations.

11 Sam Bryan, who is the Assistant Director for the
12 Technical Specification Improvement Project, which was Phase
13 1, is here with us and he will discuss the actual results of
14 their work and what their recommendations were. I'll follow
15 Sam's presentation with some discussion of Phase 2 and our
16 implementation and our proposals to move forward from here to
17 correct some of the things that we believe could be focused on
18 and improvements made.

19 Pat Baranowsky from the Office of Research is also
20 here, and he will speak briefly about some of the research
21 work which is very closely aligned with what we're doing and
22 becomes -- the tools and methods and models they're developing
23 become key ingredients in allowing us to work in such areas as
24 extending surveillance intervals and allowed outage times so
25 that we can do some of this testing at power that's going on.

1 MR. STELLO: Let me put a plug in for the -- which I
2 don't think we do enough of -- talking to the Commission on
3 issues such as the one of the kind of work that goes on in
4 research. It really puts an awful lot of scientific
5 understanding of how to go about coming up with solutions to
6 some of the problems we have, and I think I want you to keep
7 in mind that a lot of the judgments that were made in tech
8 specs were just engineering judgments without the basis of
9 what's the impact of setting a surveillance time of four hours
10 or six days or 24 hours or whatever, and what does that mean
11 in terms of safety.

12 And we're starting now to develop the tools and
13 understanding to put a real scientific basis behind helping us
14 to make some of those -- and they're still going to be
15 judgments, but now we can start to understand the impact of
16 that. And I think it's very important to start to see the
17 role that research plays in developing those kinds of tools.

18 COMMISSIONER BERNTHAL: Let me ask a broad question
19 on that general subject. I am certainly sympathetic with -- I
20 think it works out to 30 or 40 surveillance tests per day, 365
21 days a year that some of these new plants require. There can
22 be a tendency to forget to worry about whether the cookbook
23 included the baking time in the recipe when there are 100
24 directions in the recipe instead of a half a dozen.

25 On the other hand, I wonder -- and this is the

1 question now -- I wonder how difficult it would be to perform
2 all of those surveillance tests with a modest amount of
3 automation. And, Harold, we have talked about this before and
4 by making it possible to gather with modern techniques and
5 computers obviously, microprocessors, large amounts of
6 information quickly and perform these tests quickly and
7 automatically. Have we ever looked at that very carefully?

8 The other side of the coin here is that it may be
9 that performing these tests repeatedly and quickly and
10 efficiently is well within technical possibility today and we
11 just haven't pushed it.

12 MR. DENTON: I think you're quite right. One of the
13 things we have been stressing to EPRI in their new design was
14 that they should consider tech specs right from the
15 beginning. When they design an important safety system, what
16 are its limiting conditions for operation, how often should it
17 be tested -- design in a way to test it without causing
18 unnecessary scrams and trips and other problems. And I think
19 it is being done in that framework.

20 You also see it in some plants outside the U.S. that
21 have newer plants coming online. The control rooms do seem to
22 be designed for more automatic testing of systems. I think
23 the plants in this country that are being finished don't tend
24 to look that much different than plants that we licensed a
25 couple years ago.

1 CHAIRMAN PALLADINO: Let me ask a follow-up question
2 on that. It seems to me that a number of the tests are
3 required by ASME or IEEE standards, so what if you did reduce
4 the amount of testing called for in the tech specs? Would you
5 really have a significant reduction -- or could you estimate
6 what reduction there really would be in the testing as a
7 result of that?

8 MR. DENTON: That might be a good question for
9 industry. I don't know the numbers, but I think you are
10 right. I think the utilities would still do some testing that
11 they are interested in even if we didn't require it.

12 CHAIRMAN PALLADINO: But there are also these other
13 tests that I gather are required because of the applicability
14 of these codes.

15 MR. DENTON: Yes.

16 CHAIRMAN PALLADINO: I just wonder whether we really
17 would be -- or how much we would be impacting on the total
18 test program by a reduction in tech specs.

19 MR. BUTCHER: I don't believe we focused on that.

20 CHAIRMAN PALLADINO: I'm not saying we shouldn't do
21 it; maybe there's something you could get for us.

22 COMMISSIONER ZECH: I'd like to support Mr. Stello's
23 statement on involving Research in the tech spec review. I
24 think that's very important and I think it would enhance the
25 professionalism of our own review of tech specs.

1 I think the research people can play a very
2 important role to our doing a really much better job in this
3 area. As we discipline the process, why certainly, research
4 judgments can be very helpful. I think it's a very important
5 point.

6 COMMISSIONER ASSELSTINE: I think that is useful,
7 too, and I wanted to follow up on the research aspect from one
8 standpoint. It strikes me that by improving the technical
9 base, the result may well be that there is a technical
10 justification for relaxing some of this burden in terms of the
11 frequency of number of surveillance tests that are needed.

12 How much of that research work is industry paying
13 for? Because it strikes me that there is a real tangible
14 benefit from that work to the industry, and I would be
15 interested in hearing how much they are paying for that work,
16 if anything.

17 MR. STELLO: I think the answer is none.

18 MR. BARANOWSKY: Well, the research that industry
19 does, of course, is to allow them to come forward with
20 analyses that justify in their opinion modifications to
21 technical specifications. The work that we do allows the NRC
22 to perform its independent evaluation and have the capability
23 of making judgments as to whether or not the proposals by
24 industry are warranted or not. It's a fairly complex area,
25 and it would be pretty difficult on a case-by-case basis to do

1 a detailed assessment of the technology time and time again.

2 And so one of the things that Research does is
3 provides tools, capabilities, procedures to make the whole
4 regulatory process more efficient by beforehand, having worked
5 this stuff out.

6 COMMISSIONER ASSELSTINE: So it's really oriented
7 just towards the tools that are needed to evaluate the
8 industry research results.

9 MR. BARANOWSKY: Yes. A lot of the analytical
10 methods have been developed over the last several years, and
11 what's happening now is the industry and the NRC are refining
12 these tools to meet their own needs. The industry to meet
13 their needs in terms of performing analyses so they can come
14 in here and hopefully make a change in the technical
15 specifications, and the NRC converts tools that exist to meet
16 our needs in terms of evaluating the proposed modifications
17 that industry is trying to get.

18 COMMISSIONER BERNTHAL: It becomes a matter of
19 philosophy, though, whether the industry should also support
20 our ability to verify their results as well as provide the
21 support to obtain the results to begin with.

22 I was going to make the comment after you made your
23 comment, Commissioner Zech, and I fully agree with you, that
24 it's going to be interesting to see how we get the money to do
25 all this stuff with these massive budget cuts we're facing,

1 and with the predominant burden of those cuts once again
2 falling on research in this agency.

3 MR. STELLO: I would suggest that we ought to have
4 that in a more systematic way in terms of discussing how to
5 proceed with that. But without belaboring it, if the agency
6 didn't have this kind of capability, we would be in very, very
7 difficult shape to make many, many regulatory decisions.

8 And the one that stands out in my mind where I don't
9 know how we would have ever gotten out of the issue is back in
10 1971 when we were in the middle of the emergency core cooling
11 hearings. If we didn't have our own code capability to do
12 checks on the models that were being developed by the
13 industry, I don't know how we would have been able to make an
14 assessment, a judgment, that those collection of codes were,
15 in fact, okay.

16 If you had -- just using the industry code and
17 reviewing it and not having that independent capability, I
18 think you would have been hard pressed to know you were all
19 right. But that's just --

20 COMMISSIONER BERNTHAL: That doesn't answer the
21 policy question, though, of who ought to pay for it.

22 COMMISSIONER ASSELSTINE: That's right.

23 MR. STELLO: I was suggesting that sounds to me like
24 a very philosophical question. Who ought to pay our
25 salaries? Either the industry or the taxpayer, it seems to

1 me; it's going to be one or the other. But that's a
2 fundamental, philosophical question that maybe we ought to
3 have it in a more structured way.

4 CHAIRMAN PALLADINO: But I think it is a question
5 we're going to have to address, perhaps --

6 COMMISSIONER ASSELSTINE: Soon.

7 CHAIRMAN PALLADINO: -- as part of our budget
8 deliberation. But it's something we shouldn't forget.

9 MR. STELLO: I was trying to make a very important
10 point, though, Mr. Chairman. I don't see any distinction
11 between who should pay Harold Denton and his reviewers, or who
12 should pay research people. I don't see that there's
13 necessarily any difference between the two. We're one and the
14 same --

15 COMMISSIONER ASSELSTINE: I'm not sure I see a
16 difference either, and I would say that when we're talking
17 about reviews of applications, the industry pays for Harold's
18 time and the time of his reviewers.

19 COMMISSIONER BERNTHAL: The philosophical question
20 was resolved long ago in the Nuclear Waste Policy Act for that
21 component of federal activities. The industry is not only
22 paying for the repositories; they are paying for the
23 Department of Energy's activity and they apparently are going
24 to pay, if perhaps indirectly, for the NRC's monitoring of
25 DOE's efforts.

1 CHAIRMAN PALLADINO: And furthermore, there have
2 been statements made about other segments of our activity and
3 getting greater industry participation.

4 COMMISSIONER ZECH: I'd suggest we move along,
5 Mr. Chairman.

6 CHAIRMAN PALLADINO: Yes. That's exactly where I
7 was going to. That's what I was trying to suggest, too.
8 Let's do it.

9 COMMISSIONER ASSELSTINE: I had one other question
10 on the surveillance testing part, and that is, how does that
11 relate to, and what assumptions are made in terms of,
12 maintenance programs? And isn't that a part of this that you
13 need to consider as well? If you're looking at efforts to cut
14 back on the frequency of doing these surveillance tests, don't
15 you have to make some assumptions about the quality in which
16 the equipment is maintained, and have some basis for assurance
17 that those expectations are being met?

18 MR. DENTON: We've not coupled surveillance test
19 intervals with the quality of maintenance programs in the
20 past; we've tended to have standardized tech specs for the
21 same systems and we require everybody to test it. But
22 obviously in real life, someone who has a well-maintained,
23 reliable system needs to test it a lot less than someone who
24 as a poorly-maintained system.

25 COMMISSIONER ASSELSTINE: Yes.

1 MR. DENTON: I don't know, Sam, whether your group
2 looked at that or not. I should mention that Sam and his
3 group got advice from Research and I&E and regional
4 inspectors, so we had a broad-based advisory group looking
5 over what Sam was finding. I guess, Sam, maybe you'd want to
6 summarize your findings and maybe answer some of the questions
7 that we've gotten.

8 [Slide.]

9 MR. BRYAN: Okay. What established the need for
10 TSIP? We had heard complaints about too many specifications,
11 less important ones distracting from the important ones.
12 There were complaints about the size and complexity of tech
13 specs; presently, the document comprises about 500 pages.
14 Just finding where you need to be or want to be is difficult.

15 The industry availability record is low when
16 contrasted with that of some foreign reactors having fewer
17 tech specs. Their impact on this availability was
18 questioned. We'd had complaints that tech specs are not
19 operator oriented; they're written by engineers for engineers
20 to solve licensing problems, and they're placed in the control
21 room for operators to follow but they were not written with
22 this in mind.

23 Then the findings published in NUREG-1024, the
24 technical specification. Enhancing the safety impact. Some
25 test intervals are too short, some action statements were

1 punitive and unrelated to risk; equipment allowed outage times
2 are not optimum; some specifications may place the plant in a
3 less safe mode; some tests are unnecessary, causing
4 unnecessary personnel exposure, and some unnecessary
5 requirements in technical specifications.

6 COMMISSIONER ASSELSTINE: On that non operator
7 oriented, there's no reason why they have to be non operator
8 oriented, is there? I get the sense from some plants that
9 they make a very strong effort to involve their operators in
10 the drafting and design of the tech specs to make sure that
11 they are at least as compatible as possible with operational
12 needs. Others, I get the sense just as you described it;
13 we've got a bunch of engineers that write the tech specs, the
14 operators aren't involved very heavily, they're given a
15 package of stuff and said, here's what you've got to run the
16 plant with. And with remarkably different results in terms of
17 the ability to operate the plant and run it reliably.

18 MR. BRYAN: Often you see in control rooms documents
19 that says, "interpretation," "tech spec interpretations,"
20 where they've taken the literal words of the tech specs and
21 sort of put it in a language that the operator can understand.

22 But there is no reason why they can't be operator
23 oriented. We feel like this is one of our tasks; to help them
24 make it more readable and useable and clearer to operators.

25 COMMISSIONER ZECH: Good. I agree. The operators

1 in every utility should review those tech specs and should
2 understand them fully and be able to use them. And if they're
3 not in that language, then I think it's up to the utility to
4 do something about it. I usually ask on my plant visits about
5 this very thing, and ordinarily I get a pretty good answer,
6 that the operators do, indeed, pay special attention to those
7 procedures, and where they have questions they make efforts to
8 resolve them.

9 So I think it's important that they be operator
10 oriented, but as far as my experience to date, I think
11 generally they are. You could well be right in the initial
12 ones written by engineers that have not been reviewed by
13 operators. But I submit it's the operator's responsibility to
14 review them, and I agree with Commissioner Asselstine to that
15 extent; that it should be done, and we should insist that it
16 be done.

17 COMMISSIONER ASSELSTINE: Yes. In fact, a lot of it
18 is the initiative of the utility itself. I remember talking
19 with the Florida Power & Light folks about Saint Lucie, and I
20 had the sense that in that case in particular, the utility
21 made a special effort to make sure that their tech specs gave
22 them what they needed to be able to operate the plant reliably
23 and effectively. And in fact, spent a good deal of time and
24 effort working on the tech specs before the plant went into
25 operation to assure themselves that they'd have something that

1 they could work with and not something that was going to
2 create a lot of unnecessary problems.

3 MR. BRYAN: I guess I would say that there is a
4 spectrum of the quality of tech specs out there. We, in
5 talking with several operators, we found that their response
6 was that they need improvement in this area.

7 COMMISSIONER ZECH: If they need improvement, it's
8 my submission that the operator should initiate the
9 improvement. If they can't understand the tech specs, they
10 should do something about it. That's utility responsibility,
11 in my view.

12 MR. BRYAN: I understand. But it means a change --

13 COMMISSIONER ZECH: I understand that, too. But
14 they shouldn't just whine about it; they should do something
15 about it.

16 MR. DENTON: Sam, you might mention some of the
17 facilities you did -- your task force did visit, because they
18 didn't do it from sitting in Bethesda, they went out and
19 talked to people.

20 MR. BRYAN: Yes, I'm going to cover that. So we
21 were chartered to reconsider the entire area of tech specs,
22 including philosophy, scope, content, depth, how to
23 incorporate into licenses, how implemented by licensees, and
24 how enforced by NRC.

25 [Slide.]

1 This slide covers the TSIP highlights. We were
2 formed December 31st, 1984; we established an advisory group
3 January 31st, 1985; Mr. Eisenhut was named Chairman; the
4 director appointed senior management from diverse NRC offices
5 to be members. They were named from IE, the regions, AEOD,
6 Research, ELD, NRR, and we had an ACRS member as Harold
7 mentioned, Mr. Glenn Reed.

8 And we met with the advisory group several times and
9 received valuable information from them. They were not asked
10 to concur in our report.

11 Throughout this effort, we had a close working
12 interface with industry. Both our goals were to improve tech
13 specs, and we cooperated fully toward that end. It began with
14 a March 1st, 1985 meeting with industry reps and TSIP and
15 Mr. Denton present. Mr. Howell Tucker of the Duke Power
16 Company made an appeal for NRC not to go it alone. He cited
17 past experience where cooperative efforts had led to much
18 better solutions to problems. He said, in making this appeal,
19 that he was backed by AIF, the owners' groups, EPRI and ANS.

20 Members of these groups were present at that
21 meeting. The Director of NRR agreed with the need to
22 cooperate and accept their offer. They organized their
23 activities under the AIF Committee on Reactor Licensing. They
24 created a Subcommittee for Tech Spec Improvement, and Mr. Alan
25 Passwater of the Union Electric Company was named Chairman.

1 Each owners' group was represented in that
2 subcommittee, and they established four working groups to do
3 the ground work.

4 TSIP named a point of contact for each of these
5 working groups, and we met frequently with the full
6 subcommittee and more often with the individual workers.

7 Our program plan, as every project has one, was
8 approved March 19th, 1985. This is the same slide, fourth
9 item. The program plan had four objectives; to determine the
10 problems, develop alternatives to fix the problem, select the
11 best approach, and identify short-term fixes.

12 Our interim report on problem identification was
13 issued July 1st, 1985, and TSIP and AIF final reports were
14 issued containing conclusions and recommendations about
15 September 30, 1985. We held a joint TSIP/AIF meeting with the
16 Director of NRR, and presented recommendations on October
17 1st.

18 We had a trial application of the criteria using
19 Wolf Creek tech specs, and we began that October 7th, 1985.

20 [Slide.]

21 This slide deals with our problem identification and
22 possible solutions. We identified problems by interviews,
23 document reviews, contractor assistance. And interviews, we
24 visited 13 plants, we talked to five utility vendor offices.
25 The people in those offices were engineers and operators in

1 the plants. We talked to regional inspectors, resident
2 inspectors, AIF subcommittee members, public interest groups,
3 both GAP and UCS, and NRR reviewers.

4 And we sent questionnaires to NRR project managers
5 and I&E headquarters personnel to see if they had any problems
6 with tech specs. We paid special attention to the operators
7 and resident inspectors, the primary users of tech specs.

8 We found the operators responsive, and not all felt
9 that changes were needed, particularly at the older plants
10 which had custom tech specs. They'd lived with them for years
11 and knew what to expect, and they have far fewer tech specs in
12 them. And they really don't trust NRC when they hear, "We're
13 here to help you."

14 [Laughter.]

15 COMMISSIONER ASSELSTINE: Was that same view shared
16 by the residents, by the way, at the older plants? You said
17 you talked to both residents as well as the operators.

18 MR. BRYAN: Yes.

19 COMMISSIONER ASSELSTINE: They felt comfortable that
20 the tech specs for some of the older plants covered
21 everything?

22 MR. BRYAN: No. I think they felt that there were
23 improvements needed.

24 COMMISSIONER ASSELSTINE: That's what some have told
25 me.

1 MR. BRYAN: We found them supportive of taking some
2 things out of tech specs and cleaning up, and making wording
3 improvements, that sort of thing.

4 CHAIRMAN PALLADINO: How prevalent was this feeling
5 that perhaps you should just keep the old tech specs because
6 everybody's familiar with them, they set requirements clearly
7 and everybody knows what to do with them?

8 MR. BRYAN: I don't think that's a prevalent
9 feeling. I think that is a minority in the very older plants.

10 CHAIRMAN PALLADINO: Only in the older plants.

11 MR. BRYAN: The older plants. You know, the sixties
12 and early seventies plants perhaps.

13 COMMISSIONER ASSELSTINE: People with custom tech
14 specs don't want to go to standard tech specs.

15 MR. BRYAN: No, that's correct.

16 CHAIRMAN PALLADINO: They don't want -- ?

17 COMMISSIONER ASSELSTINE: Don't want to go to
18 standard tech specs.

19 MR. BRYAN: Typically they don't.

20 CHAIRMAN PALLADINO: But the utilities didn't feel
21 that they should stay with the standard tech specs at the
22 present time, or some segment of it did not, or some
23 significant segment did not?

24 MR. BRYAN: I would say that the tech specs that are
25 out there now, most of them felt that a change was needed.

1 The resident admonished us that if you wanted to
2 make sure that things that come out of tech specs get done,
3 you ought to find a way to enforce them; otherwise, they may
4 not get done.

5 As for document reviews, we looked at NUREG-1024,
6 the old George rule, which proposed a split of tech specs. It
7 came before the Commission back in the early eighties. We
8 found those very useful in problem discussion. And we also
9 looked at regulations, at some of the work of the Marvin Mann
10 task force which was the father of present-day tech specs, and
11 some of the older tech specs and some of the newer tech specs.

12 Contractor assistance. We obtained for four
13 specific areas where we had open questions in mind. The
14 impact of the tech specs on operation, containment system,
15 bases evaluation, impact of new information on tech specs such
16 as source term, leak before break principle, and screening of
17 tech specs for risk importance.

18 Within the scope of our review and as indicated in
19 our report, we found no safety problems that were compelling
20 enough for us to say, proceed immediately to fix it. We found
21 some problems that would improve safety if fixed, but in our
22 judgment were not significant enough to require fixing.

23 We did identify three problem areas. One would be a
24 lack of well-defined criteria for tech specs. There are no
25 clearcut criteria. We have guidance in an NRR office letter

1 that says if the commitment is of such importance that no
2 change should be made without prior staff approval, it should
3 be reflected in the tech specs. This leaves it to the
4 judgment of each reviewer, and each reviewer will think his
5 own area is very important naturally, and they find their way
6 into tech specs. So they become a catch-all.

7 A second problem area was the human factors and
8 technical weaknesses. For example, inadequate bases, lack of
9 clarity, inadequate requirements, inappropriate action
10 statements and problems with the definition of operability.

11 The third problem area was reluctance of the NRC
12 Staff to use tools other than tech specs. Requirements can be
13 imposed and regulations, tech specs, FSAR, license or through
14 documents such as the QA program tied to the license. The
15 staff's choice has been to use tech specs for most
16 requirements, and again, they become a catch-all covering a
17 spectrum of safety importance.

18 COMMISSIONER ZECH: But as I read the report, the
19 report suggests that perhaps we should be using other
20 regulatory tools other than just the tech specs. So you've
21 got a difference between the report and the staff view, as I
22 understand it. How -- could you comment on that and perhaps
23 talk about enforcement and the flexibility and practicality of
24 using other than the tech specs?

25 And how do you see the difference between the report

1 and the Staff position?

2 MR. BRYAN: The Staff position has always been that
3 they don't trust the 50.59 process, or they are unfamiliar
4 with it and don't use it.

5 COMMISSIONER ZECH: Do you agree with that? What's
6 the rationale?

7 MR. BRYAN: No, I don't agree with that. Things
8 that are in the Final Safety Analysis Report are requirements,
9 and in order to change those, they must do a 50.59 review.

10 COMMISSIONER ZECH: Then what is the problem? Why
11 do you think that the Staff position has been to, you know,
12 turn them all into tech specs? This is something that was of
13 concern to me as I read the report.

14 MR. DENTON: Let me give a view on it. I have
15 talked to people about it. I think when the tech specs were
16 so encompassing, we just didn't pay much attention to 50.59,
17 because if it were important, it got into the tech specs and,
18 therefore, so little was left to the Licensee --

19 COMMISSIONER ZECH: Well, that is part of the
20 problem, that's why the tech specs have grown so much.

21 MR. DENTON: Yes. So what was left to the
22 Licensee's discretion was odds and ends, and the whole focus
23 on the system was on the tech specs. And I think if we shift
24 back and reduce the amount that is in the tech spec, then we
25 should appropriately start looking more at 50.59, and I think

1 the fear, as I sensed it, Sam, among our inspection staff, was
2 that 50.59 reviews were a low priority typically in the
3 inspection modules and this sort of thing, and there was
4 concern that as more and more significant stuff moved in
5 there, they should be accompanied by looking.

6 So I think it's a philosophical sort of thing.

7 COMMISSIONER ZECH: But as least as far as you are
8 concerned, though, the report recommendation for using other
9 than tech specs is an appropriate one, and you think it is
10 workable as far as NRR is concerned, anyway?

11 MR. DENTON: Yes.

12 COMMISSIONER ZECH: Well, how about I&E? Can you
13 talk for I&E, too?

14 MR. DENTON: Well, I have talked to Jim Taylor about
15 it. I think he is concerned about the need to alter the
16 inspection scheme, that 50.59 would loom larger than it did
17 before. And so I think with appropriate management attention,
18 though, to how much inspection we give 50.59, it would work.

19 COMMISSIONER ZECH: I would hope so.

20 MR. BRYAN: Well, I have some more words to say on
21 that.

22 COMMISSIONER ZECH: I'm sorry. Go right ahead.

23 COMMISSIONER ASSELSTINE: And when you do, I hope
24 you can describe a little bit how the 50.59 process will work
25 in this particular case.

1 MR. BRYAN: All right.

2 MR. BUTCHER: Sam, excuse me. If I might say
3 something about this. I have talked to several people about
4 trying to get a better feeling myself as to what the concerns
5 are, and I think that the concern tends to be on a conceptual
6 level. When I talked to these same individuals who had
7 expressed concern with Enforcement using the other tools, when
8 I point out to them the specific things that we are talking
9 about removing from the tech specs, it's always, "Well, that
10 doesn't give me concern." I say, "We're going to take the
11 snubbers out." "Well, okay, 50.59 is fine for snubbers."
12 "I'm going to take fire detectors out." "Well, it's fine for
13 those."

14 When people deal with this on a conceptual level,
15 they say, well -- they have in their mind that what you are
16 going to do is rely on 50.59 or some other similar tool to
17 control the testing of the reactor protection system, and that
18 is not so.

19 You have to look at this issue on a substantive
20 basis, in context. You cannot deal with it on a conceptual
21 level so much, because you find that people don't communicate
22 well on a conceptual level on something like that.

23 COMMISSIONER ASSELSTINE: I do remember, however,
24 though, when we were looking at -- I think it was one of the
25 Grand Gulf enforcement cases on the training cases, that there

1 were some questions at the time about enforceability and the
2 basis for taking enforcement actions. Based upon some of
3 those FSAR commitments or derivative commitments, the qual
4 card business -- my recollection is a little fuzzy on that,
5 but I seem to recall that there was a lot of discussion about
6 what we could do to enforce on some of those things, and that
7 there were some gaps in our enforcement authority.

8 I think one of the things I want to make sure we
9 understand is what the bases for enforcement are and what the
10 differences are from having the things in tech spec to going
11 back and relying on some other ones of these alternatives. I
12 think it might be useful to have OGC take a look at that as
13 well.

14 COMMISSIONER ZECH: It seems to me it ought to be
15 resolved, because it is my understanding that we have the
16 authority for enforcement, and certainly the flexibility for
17 enforcing our rules, other than that are in the tech specs.

18 COMMISSIONER ASSELSTINE: Certainly, if it's in a
19 regulation, it is enforceable.

20 MR. STELLO: Well, unless my memory is wrong, wasn't
21 the qual card issue the issue that we took the enforcement
22 action on?

23 COMMISSIONER ASSELSTINE: I think we did.

24 MR. STELLO: And it was only an FSAR commitment.

25 COMMISSIONER ZECH: Well, it seems to me that is

1 appropriate

2 MR. STELLO: Well, as I recall, we made a major
3 issue out of an issue that was strictly an issue that was a
4 commitment in the FSAR, and our expectation is that those
5 things that are committed to in the FSAR, they will follow
6 them or they will use a 50.59 procedure as they modify them.
7 And we rely on that.

8 I think now it is a matter of degree as to how much
9 more reliance, to what extent we should put things that are in
10 the tech specs into -- let's not just say 50.59. There are a
11 lot of other mechanisms available. If you have an ASME code
12 setting forth in surveillance requirements, we are already
13 embody use of the ASME code as a part of the license. Do we
14 need to then reiterate all those things in the tech specs? I
15 don't think that you need to do some of that.

16 We have talked about -- that issue of fire
17 protection, which is before you now, that you are considering,
18 the ability to put those kinds of things in the FSAR, rather
19 than make those a very long laundry list of, again, tech
20 specs, are they appropriate? Should they be? The Staff
21 judgment now is they ought not to be.

22 There are different mechanisms and vehicles that you
23 can use. 50.59 is one of them. There are others. You could
24 find a variety of ways in which to deal with the issue. I
25 don't think you want to stay with just one particular

1 mechanism.

2 MR. VOLLMER: I think on the subject of the
3 enforcement of the FSAR commitment, I think the view that we
4 have -- and I think it is supported by ELD -- is that they are
5 not directly enforceable. That is, the FSAR commitments, if
6 somebody doesn't meet those commitments, that is not a
7 directly enforceable item. If a 50.59 change is made to that,
8 and it doesn't follow the appropriate 50.59 process, then one
9 could go back and find that that process was not used, and one
10 could enforce on that basis. But that requires, first of all,
11 that we find out that the 50.59 process was not used
12 correctly, and since that occurs after the fact, much time
13 might elapse between the time one finds the problem and it
14 actually occurs.

15 And, in fact, I think it was indicated earlier there
16 isn't a lot of attention given or regulatory time and
17 attention given to the 50.59 process. I think that is one of
18 the reasons in the package we sent down to you on fire
19 protection that Vic just mentioned, we suggested putting into
20 the FSAR those things that are currently in tech specs, but we
21 included with that a license condition, that those things had
22 to be met by the Licensee, and that gave us our enforcement
23 vehicle. And without that, we really wouldn't have one.

24 COMMISSIONER ASSELSTINE: Dick, why is it that the
25 FSAR commitment in and of itself is not directly enforceable?

1 MR. VOLLMER: Well, you would have to get some --
2 you would have to discuss it with Guy Cunningham or the
3 Enforcement people, Leiberman and so on, and that's the view
4 they have.

5 MR. MALSCH: Yes, I think there are two reasons for
6 the concern about enforceability of 50.59. The first one is
7 just the way it's worded. It's worded in terms of permission,
8 rather than restriction. It says the Licensee may make
9 certain changes, may do such-and-such.

10 The other problem is the term "change." Now
11 literally it says Licensee may make, let's say, changes in the
12 plant as described in the FSAR, unless that change involves a
13 tech spec change or a safety question. And that always
14 presents two questions for the Enforcement people:

15 First of all, is there a basis for enforcement when
16 the Licensee is not proposing to make any changes? As, for
17 example, if a provision in the FSAR is in there, has always
18 been in there, but an inspector suddenly discovers that the
19 plant isn't in accordance with the original FSAR. The
20 question then arises, do you construe the regulation narrowly
21 or in an enforcement sense broadly, so that unless he -- there
22 could be a violation, even if he isn't proposing any change,
23 merely because the plant is at variance with the FSAR.

24 I think in the enforcement case, the view may have
25 been taken that even though the Licensee isn't proposing a

1 change, if the plant is not in fact in conformity with the
2 FSAR, that in itself is enough to invoke the due process
3 called by 50.59.

4 The next problem is in the review process, and that
5 is simply that it gives the Licensee a measure of judgment and
6 expert discretion as to whether 50.59 allows the action or
7 prohibits it, with us being given an inspection or audit
8 function over his process. And I think the problem is if you
9 approach tech specs from the perspective that everything that
10 you want the Licensee to come to you first for approval before
11 doing it has to be in the tech specs, then you end up with a
12 gigantic tech spec document, because 50.59 doesn't quite get
13 you that far.

14 If you are willing to say the Licensee ought to be
15 given a better manner of judgment as to what is important and
16 not important in the operation of his plant, then 50.59 might
17 suffice.

18 CHAIRMAN PALLADINO: Well, do you foresee that as we
19 change tech specs, we are strengthening our enforceability
20 from other areas, such as FSAR?

21 MR. STELLO: I think the point that Harold made is
22 that we certainly will be looking at the way in which we have
23 been reviewing 50.59 changes, in our awareness of the 50.59
24 changes. We almost have every plant in the country with two
25 residents, and I cannot believe that any change of

1 significance that is going to be made in the plant that is a
2 regulatory concern, that we have any significant lag time in
3 being informed of it, even before the change is made.

4 CHAIRMAN PALLADINO: But Marty makes the point that
5 there are some things that may be out of compliance based on
6 the FSAR that we don't have any enforceability on. Now if you
7 put more of them in the FSAR, will we lose enforceability?

8 MR. STELLO: I have never heard an inspector tell me
9 that there is something in the plant that they think they need
10 to have major compliance with the FSAR, that there has been
11 any real difficulty in getting the Licensees to do the things
12 that they have in the FSAR.

13 CHAIRMAN PALLADINO: Well, that may be true.

14 MR. STELLO: Well, that is the real problem of what
15 goes on every day, and maybe there is some --

16 CHAIRMAN PALLADINO: But it may change if more
17 things are put in the FSAR, rather than the tech specs.

18 MR. STELLO: Well, clearly we will want to pay more
19 attention to the 50.59 process for sure. But I don't foresee
20 that there is any real major problem in terms of our going in
21 and inspecting any particular utility and finding
22 nonconformance with an application and making it an issue.
23 And I think where we took the enforcement action at Grand Gulf
24 is an excellent example of that. I assume that we did that
25 legally.

1 CHAIRMAN PALLADINO: I think the point here is to
2 make sure that that's covered.

3 MR. MALSCH: Yes, I think -- maybe the difficulty is
4 as long as there develops a common, firm understanding as to
5 what 50.59 requires.

6 COMMISSIONER ASSELSTINE: Right.

7 MR. MALSCH: And then once you understand what it
8 requires -- and that's a uniform understanding -- then you can
9 decide -- then you can fit your program into what you
10 understand it to require. And you can use 50.59 in the right
11 circumstances, and as long as you understand what those
12 circumstances are and what the basis for enforcement is, and
13 with that in mind, you take some things out of tech specs and
14 put them into the FSAR, that's perfectly okay as long as you
15 understand what you're doing.

16 CHAIRMAN PALLADINO: Well, let's move on to other
17 aspects of this tech spec program. I think we have identified
18 an area that deserves attention. I gather it's an area that
19 is going to get attention. I don't want to lose our time
20 completely because I am interested in coming back to the basic
21 question that I opened up with, and that is do we go
22 rulemaking, do we do policy statement? But I don't want to
23 interrupt the flow of your presentation.

24 MR. DENTON: I think we had better skip Slide 8 and
25 maybe 12.

1 MR. BRYAN: How about going to Recommendation?

2 Slide 9.

3 MR. DENTON: We have used about two-thirds of our
4 time.

5 MR. BRYAN: I will try to move through this rather
6 quickly.

7 Slide 9, Technical Specifications. These were
8 lifted verbatim out of our TSIP report. We recommend that
9 Commission policy statement should be issued which defines the
10 scope and purpose of the tech specs, and encourages Licensees
11 to implement a program to upgrade their tech specs. This is a
12 solution to one of our defined problems.

13 Defining the scope and purpose for new plants. Tech
14 specs will be smaller for the new plants, and for the older
15 plants, if they elect to change, it will mean a split of tech
16 specs, and they, too, will be smaller.

17 Tech specs that remain require all existing
18 procedures to change, including noticing in the Federal
19 Register, opportunity for public participation, and approval
20 by NRC before the change is made.

21 For tech specs removed, there are still requirements
22 that must be complied with. However, changes can be made by
23 the Licensee under 10 CFR 50.59.

24 But first, a review and safety determination must be
25 made as to whether or not it involves an unreviewed safety

1 question. If it does, prior NRC approval is required, and the
2 opportunity for public participation is required. If it does
3 not, the Licensee may make the change without prior NRC
4 involvement.

5 TSIP proposes no change to this NRC review process.
6 We elected to recommend a policy statement instead of a rule
7 change, to publish the Commission's scope, purpose and
8 criteria for what qualifies as a tech spec, because we want to
9 gain experience with that criteria before we codify it.

10 COMMISSIONER ASSELSTINE: Does that mean, then, that
11 if a Licensee has a large number of surveillance tests in
12 their tech specs now, that they believe should not be in there
13 under the criteria for tech spec content that you are
14 proposing, that they would then have to come in with a
15 proposed license amendment to take all those things out?
16 Right?

17 MR. BRYAN: That's right.

18 COMMISSIONER ASSELSTINE: So it would be handled on
19 a case-by-case basis. All the policy statement would do would
20 be to say the Commission is prepared to entertain requests for
21 individual license amendments if they fit the following
22 standard?

23 MR. BRYAN: Exactly.

24 CHAIRMAN PALLADINO: But one of the advantages, I am
25 told, of a policy statement is it can be implemented

1 promptly. But if you, in each case, are going to have to have
2 a hearing, will you really be implementing it more rapidly
3 than some other system?

4 MR. DENTON: I guess it's not obvious we'd have to
5 have it in every case. We have approved --

6 CHAIRMAN PALLADINO: Well, I could see it an
7 invitation for our people to take positions if they feel that
8 we are degrading the procedures for protecting public health
9 and safety.

10 MR. DENTON: I guess one example I remember was this
11 Westinghouse topical that proposed a major change in the
12 frequency of testing the reactor protection system that was
13 solid state, and we had a technical review and had
14 consultants, and I think we offered an opportunity for
15 participation. I don't believe there was ever any interest
16 shown in that, is my memory on that.

17 MR. MALSCH: I think on a statistical basis,
18 something like one half of 1 percent of operating license
19 amendments involve hearing requests.

20 MR. DENTON: I think I have made that point in
21 Sholly before, that it's very small.

22 CHAIRMAN PALLADINO: Well, it depends on how broadly
23 you change something that people have relied on for assuring
24 public health and safety.

25 MR. DENTON: I think we are not opposed at all to

1 the rule. It was just the case that we need a little
2 experience. What has happened since September and today is
3 that when Sam and his staff developed the criteria, there was
4 a question about, well, what's really going to happen when you
5 apply these criteria? So since September they have applied it
6 at Wolf Creek. They took the Wolf Creek license, applied the
7 criteria, and they have a new set, and industry is doing the
8 same thing. So we wanted to be sure we saw what the impact of
9 applying this criteria was, and I think after we understand
10 that, a proposed rule and final rule would be the way to go.

11 It's just that in the way of getting Commission
12 endorsement of the idea, I think that's what industry really
13 wants to know. Do you know at this table want to proceed with
14 this project or not? And they've put a lot of effort into
15 getting this far and we thought a policy statement is just
16 one way of showing that you support the general idea, and the
17 rule could follow as appropriate.

18 So I don't think we had any philosophical debate
19 between the two; it's just that we weren't quite at a the rule
20 stage. We thought -- you might want to cite the statistics,
21 Sam, for what happened when you applied the criteria to the
22 Wolf Creek tech spec.

23 MR. BRYAN: Ed, did you want to do that?

24 MR. BUTCHER: Yes, I have some numbers here. We
25 were going to talk about it in one of the follow-up slides,

1 but I can talk about it right now. I can just state the most
2 striking thing is that about 40 percent of the LCO's that are
3 in the tech specs now would no longer qualify in these
4 criteria.

5 Of those tech specs that came out, it's particularly
6 interesting when you look at them in terms of whether they
7 would have resulted in a plant shutdown under the existing
8 technical specifications. About 81 percent of the current
9 technical specifications which require a power limitation or
10 shutdown when you're outside the bounds of it would remain
11 under these criteria. So it tends to verify at least that the
12 judgments weren't necessarily made in a rigorous way, but 81
13 percent of them meet these particular criteria. So it
14 confirms the kind of judgment calls that have been made in the
15 past.

16 CHAIRMAN PALLADINO: I thought you said 40 percent
17 wouldn't be --

18 COMMISSIONER ASSELSTINE: Of the LCO's.

19 MR. BUTCHER: Forty percent of the LCO's.

20 CHAIRMAN PALLADINO: Now, what's the 81 percent?

21 MR. BUTCHER: Of the LCO's that remain, 81 percent
22 of them previously would have required power reduction, so
23 it's a measure of the importance of the ones that remain. Of
24 the ones that did not require a power limitation, 64 percent
25 of those went out. So the majority of things that were in the

1 technical specifications which didn't require you to change
2 the power level or shut the reactor down in fact would leave
3 the technical specifications, presumably because they are of
4 lesser importance.

5 CHAIRMAN PALLADINO: Now, these LCO's that are
6 eliminated, don't they appear anywhere? Or were they
7 eliminated because they're unnecessary, or did they appear in
8 some other document?

9 MR. BUTCHER: They're eliminated as LCO's, but you
10 have to keep in mind that everything that's in the technical
11 specifications, its genesis comes from the safety analysis, so
12 if it's in the technical specifications now, at least on a
13 conceptual level it exists in the safety analysis.

14 Now also, everything that's in the technical
15 specifications tends to be written in detail into plant
16 procedures. So when you take it out of the technical
17 specifications it would remain in the FSAR and would remain in
18 the plant procedures and then be subject to the normal
19 controls for changing those documents before it would be
20 dropped altogether as a requirement.

21 CHAIRMAN PALLADINO: How thick is this FSAR?

22 MR. BUTCHER: Oh, it could be as many as 20 volumes
23 these days.

24 CHAIRMAN PALLADINO: Okay. Now, if the LCO's are
25 buried in that 20 volumes, are they going to -- is anybody

1 going to know about it unless there's a student --

2 MR. BRYAN: Yes, we're going to know about it.

3 We're going to require that they tell us where they are going
4 in the FSAR and identify the location.

5 CHAIRMAN PALLADINO: You may have good intentions,
6 but the practicality of everybody knowing at every point that
7 this is an LCO I find difficult to even imagine. Maybe I'm
8 less capable than others.

9 MR. DENTON: I think it's a question of degree in
10 that some of these original applications we had had many
11 volumes also. And it's only a question of what do we choose
12 to control through the amendment process. So there's always
13 been a lot of commitments the licensee made here and beyond
14 that either -- that we didn't focus on or didn't inspect that
15 much to.

16 I think we've had -- most of our enforcement issues,
17 not to pick that area back up, the most important issue in our
18 tech specs is probably safety limits. And I doubt if we've
19 had very many safety limit violations at all. Vic, you might
20 know better than I do the history of this program.

21 MR. STELLO: I think probably I would say TMI had
22 violated two limits.

23 MR. DENTON: Well, yes. But moving beyond that
24 case, most of the things that we pick up are surveillance
25 requirements, or was it surveilled at the right time. And I

1 think back when the tech spec rule was written, things like
2 snubber -- we had a case where a plant was shut down because a
3 seismic snubber on a pump was found to be potentially
4 non-qualified. So the pump is declared inoperable and then
5 the plant can't run with an inoperable safety system pump.

6 Well, some of those things were ones where we would
7 have granted relief in the old days for a day or a week until
8 somebody could do an analysis and look at it. With today's
9 more formal system, it's declared inoperable and the plant
10 shuts down or else they're operating in violation of the tech
11 spec, if that pump support is in the tech spec. It's a
12 question of the extent of degree, I think.

13 CHAIRMAN PALLADINO: Well, all I was trying to
14 examine is what is the impact of moving it from one place to
15 another. And incidentally, I'm not against simplification of
16 tech specs, believe me. As a matter of fact, I remember in
17 the early days when Marvin Mann came down to talk to the ACRS
18 about how tech specs should focus on only the important
19 things.

20 What I'm trying to determine now is get a little bit
21 of feel for how important some of these things are that we're
22 taking out.

23 MR. DENTON: Maybe you ought to identify the kind of
24 things that do move out, just so you have a feel for them.

25 MR. BRYAN: Let me say this, Harold. We considered

1 an intermediate set of specifications like tech specs and
2 something in between --

3 COMMISSIONER ASSELSTINE: Administrative controls or
4 something else?

5 MR. BRYAN: They were supplemental specs, I think we
6 called them. We considered that and we concluded that that
7 was not the way to go. It's another whole new set of
8 criteria. The distinction as to where it goes and all those
9 considerations just made it very unwieldy and really it didn't
10 make a lot of sense, in our view.

11 So we felt that putting those things in the FSAR was
12 the best of the alternatives available to us.

13 COMMISSIONER ASSELSTINE: It would be useful either
14 now or maybe just a written summary of a comparison of what
15 you found on Wolf Creek. The kinds of things that would be in
16 under the standard tech specs, and then the kinds of things
17 that would be moved over to the FSAR. Maybe you could do that
18 in writing.

19 MR. DENTON: Well, where we were going in this whole
20 project was a trial use of these criteria. Industry is
21 applying a trial, we're applying a trial. Once we straighten
22 out what the differences were, if any, in how the criteria
23 apply, then come back to you sometime with a total evaluation
24 including the Wolf Creek comparisons. And that's why we sort
25 of tilted toward a policy statement, is until we get these

1 comparisons done and differences understood it was a big
2 premature.

3 We did want to get a chance to get the research
4 component in, and maybe since we're down to five minutes to go
5 maybe we should at least make the point that they did develop
6 this approach and the approach is being done on a trial basis
7 by both ourselves and industry. And we will report back to
8 you the results of that when it's completed.

9 CHAIRMAN PALLADINO: Just one more question on the
10 pros and cons of policy. Is it your intent, after so many
11 months, after so many years, to come back and propose a rule?

12 MR. DENTON: I guess we'd propose a rule if we can
13 justify it.

14 CHAIRMAN PALLADINO: And do you see any idea when
15 that might be? After a year's experience?

16 MR. BUTCHER: I wouldn't think it would take that
17 long. I think we would do it in terms of the numbers of
18 plants. If we did a couple of these plants, or actually went
19 fully through the process we could propose to do it.

20 I don't see any reason why we couldn't do it also in
21 parallel. There's no reason why we couldn't start with a
22 policy statement and then begin a rulemaking in parallel.
23 It's just a question of whether we want to put our resources
24 in the rulemaking or do we want to put it in actually applying
25 the new process. There's that issue also.

1 MR. BRYAN: Yes. I would say, too, that we would
2 like to be satisfied that we do have good workable criteria.
3 We can already see some places where a slight modification
4 might improve it. And once we're satisfied that the criteria
5 really do stand up to the test, then I think we would be happy
6 to go ahead with the rule.

7 COMMISSIONER BERNTHAL: I see general counsel is at
8 the end of the table here, and I move to inquire how the
9 Commission would go about complying with the requirements it
10 imposed on itself under the backfit rule. If we were, for
11 example, to amend our regulations in an attempt, in this case
12 apparently, to relax some of our requirements, what would
13 prevent one of the so-called public interest groups from
14 coming in and arguing in court that we have not demonstrated
15 adequately that we've done a cost-benefit analysis to justify
16 that in terms of public health and safety?

17 MR. MALSCH: Well, it would depend on how the rule
18 was worded. If it was worded in terms of not requiring
19 licensees to do anything in addition but in a sense permitting
20 them to do things which they are not permitted to do now, then
21 you might conclude that it doesn't require a backfit analysis
22 because it's not a backfit. It depends on what's done. How
23 the rule is drafted.

24 COMMISSIONER BERNTHAL: It is a change in the rules,
25 though.

1 MR. MALSCH: It would be a change in the rules, a
2 change in the requirements. But if it doesn't impose any
3 additional requirements but merely allows a licensee to do
4 some things now which he would not before have been permitted
5 to do, if you can read the backfit rule as saying that's not a
6 backfit.

7 COMMISSIONER BERNTHAL: But I assume that the
8 cost-benefit argument cuts both ways, and in fact, the
9 definition of a backfit in the backfit rule, as I recall the
10 words run something like any change in the operating or
11 -- what's the other word -- a very, very broad definition of
12 backfit.

13 MR. MALSCH: That's right.

14 COMMISSIONER BERNTHAL: So why would we be able to
15 escape the requirement of cost-benefit. And I think once
16 we're into cost-benefit on this, then we're in deep trouble.

17 MR. MALSCH: Well, you first have to reach the
18 question of whether the backfit rule applies to rules which
19 are designed to either maintain or relax requirements. If you
20 conclude that it does apply to that, then obviously it would
21 apply to this kind of a rule.

22 We've looked at it and concluded it only applies to
23 the imposition of additional requirements. And if that's the
24 case and you word the regulation so that it permits people to
25 do things which they're not now permitted to do but doesn't

1 impose any additional burdens, you then conclude it's not a
2 backfit.

3 COMMISSIONER BERNTHAL: It doesn't sound like you're
4 imbued with a surfeit of confidence in the way you're
5 appraising this. But --

6 MR. MALSCH: No, actually I'm quite comfortable with
7 that interpretation; otherwise, the backfit rule makes no
8 sense, because the commission then would have disabled itself
9 from ever making any safety relaxations or improvements, other
10 than the other direction.

11 MR. STELLO: I think in fairness to Marty the
12 question is perhaps you've got to take the next step. After
13 having written a rule which perhaps you wouldn't have to do
14 all the backfit analysis because it becomes an elective rule,
15 one where a utility then could apply those criteria, when he
16 comes back in and the utility now asks to relax the tech specs
17 pursuant to taking that option, then do you really accomplish
18 anything, because is it not going to be individual cases which
19 can then be contested, because won't it still be a licens-
20 change, amenable to the amendment process and the Sholly
21 procedures.

22 COMMISSIONER BERNTHAL: Well, all I can say is that
23 this is going to be a good test case and that it would be the
24 supreme irony if the Commission in its backfit rule succeeded
25 in preventing itself from even relaxing regulations and

1 regulatory requirements.

2 MR. STELLO: Let me go on. If we wanted to write
3 the rule that would deal with both issues, that is, be able to
4 write a rule phrased with the right language which would
5 effectively mandate removing or taking out certain portions of
6 the tech specs so that we wouldn't have to go through the
7 case-by-case analysis, then I think -- and let me ask Marty --
8 in that case I believe we would have to do a backfit analysis.

9 MR. MALSCH: I agree with that.

10 MR. STELLO: We would be required to do that, and we
11 would. If we did it so it was mandated, we'd do a backfit
12 analysis. And we'd do one. You do them generically.

13 MR. MALSCH: The other question is: to what extent,
14 by rulemaking, you could realistically expect to eliminate the
15 need for contested hearings on contested issues. Rulemaking
16 is designed to resolve issues generically. I suspect a lot of
17 these tech specs involve plant-specific safety questions, and
18 as a practical matter there probably is not a whole lot you
19 can do by way of rulemaking to eliminate those. It may go
20 some way in that direction.

21 MR. STELLO: And I think that's part of what we want
22 to understand before we finally come forward with a rule,
23 because you really have two issues you're trying to resolve.
24 One is how to assure yourself you have the right criteria, and
25 then if you're going to issue a rule, how could you issue the

1 rule to save the burden both on us and the licensees and do
2 it generically, since that's the real purpose. And that
3 requires I think a bit more thought before we're prepared to
4 make sure that the rule we come forward with accomplishes both
5 purposes. I don't think we're ready to do that.

6 CHAIRMAN PALLADINO: What did AIF think in terms of
7 rule instead of --

8 MR. STELLO: I think that they're looking down the
9 road. To the best of my knowledge, -- and I asked them just
10 before the meeting -- they aren't objecting to policy
11 statement as the right first step to take. At least that's my
12 understanding.

13 CHAIRMAN PALLADINO: Well, I think you've given us
14 some pretty cogent points on policy statement.

15 MR. STELLO: Yes. I would like to -- because I
16 think the real issue behind all of this is how now, when we go
17 about making these changes, do -- that we have some tools that
18 we didn't have before that caused us I think to make some of
19 thre judgments we made about what issues ought to be in tech
20 specs and what do they mean. And now we can start getting
21 some of the insights.

22 If we could have Research at least go through some
23 of the kinds of activities that we've been into in the last
24 few years.

25 MR. MALSCH: Before I go, I just wanted to mention

1 that Commissioner Asselstine has asked us for a legal opinion
2 on precisely the question that Commissioner Bernthal asked
3 me. Does the backfit rule apply to --

4 CHAIRMAN PALLADINO: We asked you for the rationale
5 for an earlier decision that you gave.

6 MR. MALSCH: That's right.

7 COMMISSIONER ASSELSTINE: They gave the conclusion.
8 What I asked for was the rationale for it.

9 CHAIRMAN PALLADINO: I know, but I'm interested in
10 what comes out, also.

11 Okay, let's go ahead.

12 MR. EARANOWSKY: What we've heard discussed are some
13 of the administrative and technical issues associated with
14 technical specifications. And what I'd like to do is identify
15 the role that Research has had and is planning on having in
16 the technical specification improvement work.

17 The NRC and the nuclear industry over the last few
18 years have recognized that certain aspects of technical
19 specifications, such as allowed outage times and surveillance
20 test intervals, could be related to reliability of plant
21 systems and hence to risk at nuclear power plants.

22 The NRC took a look at technical specifications in
23 NUREG-1024 and concluded that the use of reliability and risk
24 analysis would be a worthwhile endeavor in terms of bringing
25 the proper tools to bear on evaluating technical

1 specifications.

2 Following publication of that document, Research
3 planned a program called "Procedures for Evaluating Technical
4 Specifications," which is given the initials PETS, and that's
5 being carried out by the Division of Risk Analysis in
6 Operations and Research. That program has as its overall
7 objectives to develop methods and procedures which are based
8 on reliability and risk assessment techniques for evaluation
9 of techniques and to provide tools that are associated with
10 that development which enhance the efficiency, the
11 consistency, and the technical adequacy of the regulatory
12 review process, as people try to evaluate changes in technical
13 specifications that are related to reliability and risk.

14 COMMISSIONER ASSELSTINE: You might want to go to
15 Slide 11.

16 [Slide.]

17 MR. BARANOWSKY: I have just covered the overall
18 objectives of the program.

19 Specifically, the research program is directed at
20 the items in the second major bullet that I have identified.
21 We are developing and refining reliability analysis computer
22 codes, and one code that has been quite useful, which has been
23 developed and refined over the last few years, is FRANTIC. We
24 have used that for some plant-specific and generic analyses,
25 and in particular, we used the computer code during the Salem

1 ATWS deliberations, and someone brought up an issue earlier
2 about maintenance and its relationship to surveillance
3 intervals, and I specifically recall looking at the impact of
4 the reactor trip breaker reliability, given proper maintenance
5 and improper maintenance and how that might affect the
6 proposed surveillance intervals, and we found that, given
7 proper maintenance, the surveillance trip breakers, at least
8 in our generic analysis, could at least be maintained at the
9 current surveillance interval, and probably the interval could
10 be extended.

11 Since then, I believe analyses have been done and
12 reviewed by Westinghouse, in which that conclusion has been
13 confirmed.

14 COMMISSIONER ASSELSTINE: But that sounds like,
15 then, it becomes terribly important to ensure that everybody
16 has an adequate and an effective maintenance program in place
17 at all times, if that's what you're going to use as the basis
18 for setting those intervals.

19 MR. BARANOWSKY: For equipment that are particularly
20 important and that one can show the importance of the reactor
21 trip breakers, the maintenance and surveillance on that
22 component is important. In fact, that's one of the strengths
23 of this analysis, is that it can show you what's important,
24 maintenance and surveillance on the type of equipment that one
25 should be paying most careful attention to.

1 MR. STELLO: Let me make a point, though, to
2 emphasize something that is very, very important.

3 Most equipment, like trip breakers, to perform the
4 maintenance, one has to remove that breaker from service.
5 When you take a component out of service that was performing a
6 safety function, you change the vulnerability of that system,
7 so that it becomes more sensitive to failures, which can
8 increase substantially the risk.

9 So just doing maintenance and doing it well is
10 clearly important, but how often you do it and how much of a
11 risk you take by doing it, since you clearly change the way
12 the system can operate -- if I take a pump out of service or a
13 diesel generator to perform maintenance which requires me to
14 take it apart, then I don't have that component available.
15 The more often I do that, the more frequent I do it, then
16 clearly I can create a decrease in safety by doing it more
17 frequently rather than less frequently.

18 So one has to look carefully at how to -- how often
19 to do those kinds of things in a plant.

20 MR. BARANOWSKY: We looked at that explicitly here,
21 and that's some of the tradeoff types of things that we looked
22 at in the analysis, for instance. As one does more and more
23 surveillance and maintenance, the opportunity for problems
24 grows, as well as the downtime associated with taking the
25 equipment out, and thus one has to trade off those

1 considerations against the safety enhancement associated with
2 performing the surveillance.

3 COMMISSIONER ASSELSTINE: But that takes you to the
4 next step, which is, do we need a much more ambitious
5 preventive and predictive maintenance program that focuses on
6 doing a lot of that work, much heavier work, during outages,
7 so that you're not taking equipment out of service during the
8 operational program?

9 MR. STELLO: That is a very good question that we
10 need to come to grips with, because we require a great deal of
11 surveillance and maintenance throughout the operating cycle of
12 the plant.

13 Question: Is that the right way to do it?

14 COMMISSIONER ASSELSTINE: Right. Make sure it's
15 overhauled during the outages, and then you don't have to fool
16 with it while the plant is running.

17 MR. STELLO: and that's the kind of insight you get
18 out of looking and using these tools.

19 COMMISSIONER ZECH: I think I've asked you to look
20 into that fairly recently, and I hope you're doing that. I've
21 been most impressed by the number of surveillances we do and
22 the actual testing we do when the plant is operating, and it
23 does seem to me a very important issue to look into.

24 MR. STELLO: That's really one of the fundamental
25 issues that's being faced here.

1 COMMISSIONER ZECH: Good.

2 MR. STELLO: Because the requirement for the
3 frequency of those surveillances are set in the tech spec
4 documents, and one has to ask the question whether we have, in
5 fact, decreased safety.

6 COMMISSIONER ZECH: And as far as I'm concerned,
7 this very issue has a very direct bearing on safety. Safety
8 of operations is involved here when we require various
9 testing and surveillances when the plant is running at a high
10 power level, up to full power. And we do that, of course, an
11 awful lot, and I'm glad that you are looking into it. I think
12 it's very important.

13 COMMISSIONER ASSELSTINE: But the quid pro quo for
14 decreasing some of those frequencies may well be doing much
15 more, doing more along the lines of what some of the European
16 countries and Japan do in terms of more aggressive outage
17 maintenance programs.

18 MR. STELLO: They are clearly doing it better.

19 COMMISSIONER ASSELSTINE: That's right.

20 MR. STELLO: Surely.

21 COMMISSIONER ASSELSTINE: And it almost looks like
22 that has to be factored in.

23 COMMISSIONER ZECH: It has to be factored in, the
24 whole consideration.

25 CHAIRMAN PALLADINO: Well, I gather they are. I

1 think it's a very important point and one not to be lost.

2 MR. BARANOWSKY: Let me point out that the research
3 activities here are directly related to the technical aspects
4 of the tech specs that were identified earlier as needing some
5 work, and I have identified the four of them, and I can say a
6 few words on each of them.

7 For instance, the limiting conditions for operations
8 or the LCOs. We have planned research to use PRA techniques
9 and models to provide a supplement to the deterministic
10 criteria, which is based primarily on single-failure criteria,
11 for determining what should be the content of the technical
12 specifications that should have LCOs.

13 Here, we're concerned not only with completeness --
14 Is everything covered? -- but with overzealousness in perhaps
15 looking at the risk relevance of the things that are included
16 in there to see if we're either overregulating or perhaps
17 underregulating.

18 Another element of the tech specs that the research
19 program has focused on are the action statements, and here
20 we're talking about the allowed outage times or the AOTs, and
21 the specific actions that Licensees take when they exceed the
22 allowed outage times, an important item because sometimes you
23 have a plant mode change, which is not always necessarily
24 advisable considering the type of equipment that might be out.

25 We've done a fair amount of work in developing the

1 methodology for looking at what are the appropriate allowed
2 outage times and how to evaluate allowed outage time
3 submittals, and we are in the process of finalizing
4 recommended procedures for doing that.

5 The look at the risk implications of the action
6 requirements themselves is planned for Fiscal Year '86.

7 Surveillance requirements are another aspect of tech
8 specs that the research program has been investigating. Here,
9 we have developed the methodology which is typical of FRANTIC
10 -- other methodologies exist -- to look at surveillance test
11 intervals.

12 It's important to look at various competing
13 considerations and surveillance test intervals. We think we
14 have the methodology well in hand, and by doing some final
15 demonstration tests, we can develop procedures within the near
16 future which can be used, I think, to fairly quickly evaluate
17 surveillance test interval requirement proposals from industry
18 or NRC's own investigations.

19 COMMISSIONER BERNTHAL: Can't we find a better name
20 for that program than FRANTIC?

21 CHAIRMAN PALLADINO: Yes. I was going to say, it
22 joins a list of names like SCRAM, Turkey Point, Diablo Canyon.

23 MR. BARANOWSKY: Well, you know, in the old days, I
24 guess, people had a desire to come up with crazy names, and it
25 stuck.

1 We do have another research program which I'm just
2 going to mention here for one second. That is the Operational
3 Safety Reliability Research Program, which looks at the
4 potential for blind spots existing in the current surveillance
5 or testing requirements.

6 The tech spec program, PETS, looks at the risks
7 associated with performing surveillances at different
8 intervals. Our other reliability program looks at whether or
9 not the testing is sufficient or necessary and perhaps
10 addresses the issue that Vic raised earlier of, maybe we can
11 do some things at different times in the year, rather than
12 during plant operation.

13 It's related. I wanted to mention it. We can go
14 on with or without it. But it would be more efficient, of
15 course, to have that type of information.

16 Lastly, I think one of the important things that
17 we're doing in our research is providing the connection
18 between safety and the tech spec requirements through
19 reliability and risk considerations. And I think that's an
20 important point, because the question we're asking is: Why do
21 we have these requirements, and what are the requirements
22 based on; what are the acceptance criteria, so that Licensees
23 and people who carry out the requirements of the tech specs
24 have a clear understanding of where they're going with this,
25 and we have a clear understanding of why we have the

1 requirement, what its relationship to safety and risk is.

2 In summary, I would just like to point out that we
3 have activities ongoing, planned, to evaluate the quantity
4 aspects of tech spec requirements and evaluate the risk
5 relevance of technical specifications scope and content, and
6 that work should take place over the next 18 to 24 months.
7 It's ongoing.

8 COMMISSIONER ASSELSTINE: You mentioned on the
9 Operational Safety Reliability Research Program that we could
10 go on without it. Is this one of the ones that's -- one of
11 the programs that is targeted for cuts?

12 MR. BARANOWSKY: I don't know, to be honest with
13 you, everything that's being targeted for cuts. I'm just
14 saying that I would go on in this program, even if we had no
15 requirement to do that. It would be more efficient to include
16 that type of activity.

17 COMMISSIONER ASSELSTINE: I was just wondering if
18 that's what the problem was.

19 MR. STELLO: The answer is no.

20 Let me try to summarize where we are. I have had a
21 role in tech specs, I guess it must be more than ten years
22 now, Marty, since you and I chatted about the need to move.

23 While this may not be the perfect answer, and
24 certainly isn't, I think it's time to at least take a first
25 step.

1 [Commissioner Bernthal leaves the hearing room.]

2 MR. STELLO: This policy statement is a first step.
3 We have a lot to learn. I think that our real legitimate
4 safety issues of how to get plants to be safer, both by making
5 sure that where we need to add more, we've added more, and
6 where we have too much and we're detracting from safety, we
7 also take that action.

8 And I would urge that the Commission agree to move
9 forward with the policy statement, so that we can start to
10 make some measurable progress and changes. We have just been
11 dealing with this issue too long, and we have to move it off
12 dead center.

13 I would not object to the Commission scheduling
14 something quickly to hear AIF and make sure that you hear
15 firsthand the industry views. I think if they have an issue
16 that they need to bring to your attention and you need to hear
17 how they view what we are doing and what their views are, I
18 would urge you to do that quickly, so that we can move on and
19 get it behind us.

20 We're finished.

21 CHAIRMAN PALLADINO: I think you make a good point.
22 I think AIF had asked to be heard, but we wanted to hear the
23 Staff first.

24 I suggest we do follow your recommendation, have AIF
25 in as soon as we possibly can, and then encourage

1 Commissioners to address the paper as promptly as they
2 possibly can.

3 I think you've answered a number of questions
4 that were bothering me, especially with regard to the
5 relationship of a policy statement to rulemaking. I think I
6 understand that better than I did before and am more prepared
7 to adopt it.

8 COMMISSIONER ZECH: I agree. I think we ought to
9 get on with it. We've talked about it long enough, and I
10 certainly think it appropriate to hear from AIF, but I also
11 agree that we ought to put out the policy statement that the
12 Staff has recommended and move out.

13 COMMISSIONER ASSELSTINE: Well, I gather from the
14 schedule in the paper, the Staff is talking about, it would
15 take until about this summer to put the policy statement
16 together.

17 I certainly don't have a problem with bringing AIF
18 in. I still have a few other questions that I think I'll just
19 send to the Staff in writing, and I would like to get a sense,
20 even if it's a crude sense, of what the Staff's current
21 understanding is that the difference would be in terms of tech
22 specs, depending upon what you've done so far in the Wolf
23 Creek --

24 MR. STELLO: We'll be happy to provide you with what
25 we have on Wolf Creek next week.

1 COMMISSIONER ASSELSTINE: That would be fine.

2 MR. STELLO: We'll give you what we have. I don't
3 see any reason why we have to have a finished product, as long
4 as you understand it's not finished, that it's preliminary.

5 COMMISSIONER ASSELSTINE: That's fine.

6 MR. STELLO: What I would really like to do is to
7 start getting on with it and find out where we have our
8 weaknesses and our strengths and take advantage of our
9 strengths and start getting rid of the weaknesses.

10 COMMISSIONER ASSELSTINE: Okay. And I would like, I
11 think, to give you a few examples and have you trace through
12 the differences between -- on the enforceability side, how the
13 50.59 process would work, going through a few examples, so I
14 get a sense for what the difference would be, both in terms of
15 the inspection burden and the enforcement.

16 MR. STELLO: Now that, we can't answer, because
17 we're going to have to develop a new way in which we're going
18 to go forward if we make this change.

19 We are committed to improving our 50.59 process as
20 part of it, but that will take time, too, as to how to do it,
21 because it is resource-intensive, and you don't want to start
22 getting tied up with doing a lot more than we need to, and
23 especially involving Residents in the inspection process.

24 So we want to approach it with some caution. We
25 won't have a complete answer.

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5 This is to certify that the attached proceedings
6 before the United States Nuclear Regulatory Commission in the
7 matter of: COMMISSION MEETING
8

9 Name of Proceeding: Briefing on Status of Task Force on
10 Technical Specifications (Public Meeting)

11 Docket No.:

12 Place: Washington, D. C.

13 Date: Tuesday, January 21, 1986
14

15 were held as herein appears and that this is the original
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17 Regulatory Commission.
18

19 (Signature) *Suzanne B. Young*

(Typed Name of Reporter) Suzanne B. Young
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21
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23 Ann Riley & Associates, Ltd.
24
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NRR TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM

COMMISSION BRIEFING

JANUARY 21, 1986

HISTORY OF TECHNICAL SPECIFICATION DEVELOPMENT

- ATOMIC ENERGY ACT OF 1954
- 1956 10 CFR 50.36 ISSUED
- 1962 10 CFR 50.36 AMENDED, APPENDIX A ADDED
- 1968 10 CFR 50.36 AMENDED TO MAKE TS A SEPARATE DOCUMENT
 - ° SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS
 - ° LIMITING CONDITIONS FOR OPERATION (LCOs)
 - ° SURVEILLANCE REQUIREMENTS
 - ° DESIGN FEATURES
 - ° ADMINISTRATIVE CONTROLS

HISTORY OF TECHNICAL SPECIFICATION DEVELOPMENT
(CONTINUED)

- 1974 STANDARD TECHNICAL SPECIFICATIONS (STS)
 - ° LIMITING CONDITIONS FOR OPERATION (LCOs)
 - ° ACTION STATEMENTS
 - ° SURVEILLANCE REQUIREMENTS (TESTING)
 - ° BASES

- 1979 ALAB 531

"TECHNICAL SPECIFICATIONS ARE TO BE RESERVED FOR THOSE MATTERS AS TO WHICH IMPOSITION OF RIGID CONDITIONS OR LIMITATIONS UPON REACTOR OPERATION IS DEEMED NECESSARY TO OBVIATE THE POSSIBILITY OF AN ABNORMAL SITUATION OR EVENT GIVING RISE TO AN IMMEDIATE THREAT TO THE PUBLIC HEALTH AND SAFETY." (ALAB-531)

GROWTH IN TECHNICAL SPECIFICATION REQUIREMENTS

<u>PLANT (LICENSE DATE)</u>	<u>TOTAL NO. OF LCO'S</u>	<u>SURVEILLANCE TESTS* REQUIRED PER YEAR</u>
SURRY 1 (1972)	19 SYSTEMS MULTIPLE LCO'S	390
COOK 2 (1977)	119	9,700
SEQUOYAH 1 (1980)	136	15,000
CALLAWAY 1 (1984)	110	14,000

*BASED ON A SAMPLING OF SIX SYSTEMS: RPS, ACCIDENT MONITORING INSTRUMENTATION, FIRE DETECTION INSTRUMENTATION, LIQUID RADWASTE MONITORING INSTRUMENTATION, PRESSURIZER AND PORV, AND LIQUID EFFLUENTS.

NRR TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM

- PHASE I

PROBLEM IDENTIFICATION AND
RECOMMENDATIONS, TSIP REPORT

- PHASE II

IMPLEMENTATION, TSCB

NEED FOR TSIP

- TOO MANY SPECS - LESS IMPORTANT ONES THUS DETRACTING FROM IMPORTANT ONES
- SIZE AND COMPLEXITY OF TS
- INDUSTRY AVAILABILITY RECORD
- NOT OPERATOR ORIENTED
- FINDINGS OF NUREG-1024 "TECHNICAL SPECIFICATIONS-ENHANCING THE SAFETY IMPACT"

TSIP HIGHLIGHTS

FORMED	DECEMBER 31, 1984
ADVISORY GROUP ESTABLISHED	JANUARY 31, 1985
INDUSTRY MEETING WITH TSIP/DIRECTOR NRR	MARCH 1, 1985
PROGRAM PLAN APPROVED	MARCH 19, 1985
INTERIM REPORT ON PROBLEM IDENTIFICATION ISSUED	JULY 1, 1985
TSIP AND AIF FINAL REPORTS ISSUED	SEPTEMBER 30, 1985
JOINT TSIP/AIF MEETING WITH DIRECTOR, NRR, TO PRESENT RECOMMENDATIONS	OCTOBER 1, 1985
TRIAL APPLICATION OF CRITERIA INITIATED - WOLF CREEK TS	OCTOBER 7, 1985

PROBLEM IDENTIFICATION AND POSSIBLE SOLUTIONS

- IDENTIFIED PROBLEMS BY INTERVIEWS, DOCUMENT REVIEWS, AND CONTRACTOR ASSISTANCE
- FOUND NO SAFETY PROBLEMS REQUIRING IMMEDIATE ACTION
- IDENTIFIED THREE PROBLEM AREAS
 - ° LACK OF WELL-DEFINED CRITERIA FOR TS
 - ° HUMAN FACTORS AND TECHNICAL WEAKNESSES
 - ° RELUCTANCE OF THE NRC STAFF TO USE TOOLS OTHER THAN TS
- CONSIDERED A WIDE RANGE OF POSSIBLE SOLUTIONS
- DEVELOPED EVALUATION MATRIX TO GAIN INSIGHTS
- DREW CONCLUSIONS AND RECOMMENDATIONS

TECHNICAL SPECIFICATION IMPROVEMENT PROJECT
CONCLUSIONS

- "(1) THERE ARE NO ACUTE SAFETY CONCERNS OR RESOURCE BURDENS WHICH WOULD SUPPORT IMPOSING A MANDATORY PROGRAM OF CHANGES TO THE TECHNICAL SPECIFICATIONS OF OPERATING REACTORS,
- (2) IMPROVEMENTS IN BOTH SAFETY AND RESOURCE REQUIREMENTS CAN BE REALIZED THROUGH A FOCUSED EFFORT TO CORRECT HUMAN FACTORS AND OTHER TECHNICAL WEAKNESSES IN THE TECHNICAL SPECIFICATIONS,
- (3) DEFINITION OF THE SCOPE AND PURPOSE OF TECHNICAL SPECIFICATIONS WOULD PROVIDE USEFUL GUIDANCE TO THE NRC AND SHOULD LEAD TO SUBSTANTIAL NRC RESOURCE SAVINGS,
- (4) MAXIMUM SAFETY ENHANCEMENT WILL REQUIRE PARTICIPATION OF LICENSEES AND OTHER INTERESTED GROUPS,
- (5) DEFINITION OF THE SCOPE AND PURPOSE OF TECHNICAL SPECIFICATIONS IS AN IMPORTANT INCENTIVE FOR INDUSTRY PARTICIPATION IN A PROGRAM TO IMPROVE TECHNICAL SPECIFICATIONS."

TECHNICAL SPECIFICATION IMPROVEMENT PROJECT
RECOMMENDATIONS

"(1) A COMMISSION POLICY STATEMENT SHOULD BE ISSUED WHICH DEFINES THE SCOPE AND PURPOSE OF TECHNICAL SPECIFICATIONS AND ENCOURAGES LICENSEES TO IMPLEMENT A PROGRAM TO UPGRADE THEIR TECHNICAL SPECIFICATIONS."

CRITERIA FOR TS CONTENT

- ° AN INSTALLED SYSTEM THAT IS USED TO DETECT, BY MONITORS IN THE CONTROL ROOM, A SIGNIFICANT ABNORMAL DEGRADATION OF THE REACTOR COOLANT PRESSURE BOUNDARY,
- ° A PROCESS VARIABLE THAT IS AN INITIAL CONDITION OF A DBA ANALYSIS,
- ° A STRUCTURE, SYSTEM, OR COMPONENT THAT IS PART OF THE PRIMARY SUCCESS PATH OF A SAFETY SEQUENCE ANALYSIS AND FUNCTIONS OR ACTUATES TO MITIGATE A DESIGN BASIS ACCIDENT,

TECHNICAL SPECIFICATION IMPROVEMENT PROJECT
RECOMMENDATIONS (CONTINUED)

- "(2) THE NRC SHOULD GIVE INCREASED ATTENTION TO CHANGES MADE BY LICENSEES USING THE 10 CFR 50.59 PROCESS.
- (3) THE NRC SHOULD REVIEW AND REVISE THE STANDARD TECHNICAL SPECIFICATIONS TO CORRECT HUMAN FACTORS AND OTHER TECHNICAL WEAKNESSES THROUGH A PROGRAM OF TECHNICAL ASSISTANCE AND DEDICATED IN-HOUSE TECHNICAL RESOURCES.
- (4) THE NRC SHOULD ENCOURAGE THE CONTINUED DEVELOPMENT AND APPLICATION OF PROBABILISTIC RISK ASSESSMENT METHODS TO ADDRESS TECHNICAL SPECIFICATIONS REQUIREMENTS."

RESEARCH IN SUPPORT OF TECH SPEC PROGRAM

- PETS RESEARCH PROGRAM
 - ° DEVELOP METHODS AND PROCEDURES BASED ON RELIABILITY AND RISK TECHNIQUES TO EVALUATE TECH SPEC REQUIREMENTS
 - ° PROVIDE TOOLS WHICH ENHANCE EFFICIENCY, CONSISTENCY, AND TECHNICAL ADEQUACY FOR REGULATORY REVIEW PROCESS
- SPECIFIC RESEARCH TO SUPPORT TECH SPEC PROGRAM
 - ° DEVELOPMENT, REFINEMENT OF RELIABILITY ANALYSIS COMPUTER CODES (E.G. FRANTIC)
 - ° LCOs - SUPPLEMENT DETERMINISTIC CRITERIA FOR TECH SPEC CONTENT: COMPLETENESS AND RISK RELEVANCE
 - ° ACTION STATEMENTS - METHODOLOGY TO EVALUATE AOT AND RISK IMPLICATIONS OF ACTION REQUIREMENTS
 - ° SURVEILLANCE REQUIREMENTS - METHODOLOGY TO EVALUATE SURVEILLANCE TEST INTERVALS: OSRR EVALUATING POTENTIAL "BLIND SPOTS" IN SURVEILLANCE TESTING
 - ° BASES - RELATING TECHNICAL SPECIFICATION REQUIREMENTS TO RELIABILITY AND ULTIMATELY TO RISK

TECHNICAL SPECIFICATION COORDINATION BRANCH
(TSCB)

- FUNCTIONS

- ° EVALUATION AND TRIAL PRACTICAL APPLICATION OF TSIP RECOMMENDATIONS
- ° COORDINATION AND OVERSIGHT OF ALL NRR TECHNICAL SPECIFICATION ACTIVITIES

- TSCB ORGANIZATION

- ° PROJECT TEAMS (BY VENDOR)
- ° PROVIDES POINT CONTACT AND FOCAL POINT FOR OWNERS GROUPS ON TECHNICAL SPECIFICATION ISSUES
- ° PARALLELS NRR ORGANIZATION TO FACILITATE COORDINATION AND OVERSIGHT

ONGOING ACTIVITIES

- TRIAL USE OF TSIP CRITERIA
- MEETINGS WITH INDUSTRY OWNERS GROUPS AND AIF
- SHORT TERM IMPROVEMENTS TO EXISTING STS
 - ° FIRE PROTECTION TECHNICAL SPECIFICATION
 - ° ACTION STATEMENTS FOR MISSED SURVEILLANCE TESTS
 - ° BWR RPS SURVEILLANCE INTERVALS AND AOTs (NEDC-30851P)
 - ° BWR ECCS INSTRUMENTATION SURVEILLANCE INTERVALS AND AOTs (NEDC-30936P)
- EVALUATION OF COMMENTS ON TSIP REPORT

FUTURE ACTIVITIES

- DETAILED IMPLEMENTATION PROGRAM PLAN - 03/01/86
- PROPOSED COMMISSION POLICY STATEMENT - 06/01/86
- ULTIMATE LONG TERM OBJECTIVE
 - "A COMPLETE REWRITE/STREAMLINING"
OF THE EXISTING STS BASED ON THE
RECOMMENDATIONS OF THE TSIP REPORT

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