



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

October 1, 2018

MEMORANDUM TO: Gregory T. Bowman, Chief  
Reactor Oversight Process Assessment Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Alexander D. Garmoe, Senior Reactor Operations Engineer */RA/*  
Reactor Oversight Process Assessment Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING  
GROUP PUBLIC MEETING HELD ON SEPTEMBER 20, 2018

On September 20, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a Reactor Oversight Process (ROP) public meeting with the Nuclear Energy Institute's (NEI's) ROP Task Force and other industry representatives. A summary of the discussion topics is provided below.

Opening Remarks

The branch chiefs of ROP Assessment and Inspection Branches provided opening remarks summarizing ongoing activities of interest. These included a status update on the assessment of changes to the NRC's engineering inspection program; upcoming updates to various attachments to Inspection Manual Chapter (IMC) 0609, "Significance Determination Process," to permanently incorporate the Inspection Finding Resolution Management initiative and to make minor changes to Significance and Enforcement Review Panel decision-making guidance; and an ongoing effort to improve the guidance for minor vs. more-than-minor determinations in IMC 0612, "Issue Screening," Appendix E, "Examples of Minor Issues."

Enhancing the ROP

The industry presented an overview of recommendations to enhance the ROP, which were transmitted in a letter from NEI on September 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18262A322).

Enclosure:  
Meeting Attendance List

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Industry recommendations were broadly grouped into four areas: Baseline Inspection Program, Action Matrix, Significance Determination Process (SDP), and Response to Inspection Issues. The slides that accompanied the industry presentation are available in ADAMS at Accession No. ML18262A375. The NRC staff asked some clarifying questions about the recommendations, and staff and industry agreed to plan for more in depth discussion on the recommendations and possible paths forward at upcoming ROP public meetings after the NRC staff has had an opportunity to review the recommendations.

### IMC 0609 Revisions

Staff provided an update of ongoing revisions to various attachments and appendices to Inspection Manual Chapter (IMC) 0609.

- Attachment 4, "Initial Characterization of Findings," of IMC 0609 is undergoing a minor revision to resolve internal feedback that has been provided based on use of the IMC over the years and to support use for AP1000 issues in the future.
- Staff in the NRC's Office of Nuclear Security and Incident Response continue to work on a focused evaluation of IMC 0609, Appendix B, "Emergency Preparedness Significance Determination Process." External stakeholder comments and internal feedback are currently being assessed and the staff is targeting the January/February timeframe for the next public meeting on this effort.
- A draft revision to IMC 0609, Appendix D, "Public Radiation Safety Significance Determination Process," was made publicly available on June 28, 2018, and is available in ADAMS at Accession No. ML18178A100. This draft revision was discussed in detail at the July 19, 2018, ROP public meeting and staff made a final solicitation for external feedback. The external feedback received is publicly available in ADAMS at Accession No. ML18264A305. An internal comment period will be followed by issuance of the final revision in early 2019.
- Efforts to update IMC 0609, Appendix E, "Security Significance Determination Process for Power Reactors," Part 1, "Baseline Security Significance Determination Process for Power Reactors," available in ADAMS at Accession No. ML18164A326, and Part 2, "Force on Force Significance Determination Process," continue. NRC staff indicated that it expects to issue the revised IMC 0609, Appendix E, Part 1 guidance by the end of September 2018. The NRC staff discussed that Part 2 of IMC 0609, Appendix E is on a longer path to issuance since Commission interaction will be necessary.
- The NRC staff advised attendees that there would be discussion on revisions to IMC 0609, Appendix H, "Containment Integrity Significance Determination Process," at the October ROP monthly meeting. No discussion of the changes occurred at this meeting.
- The NRC staff noted during the meeting that minor changes to IMC 0609, Appendix I, "Operator Requalification Human Performance Significance Determination Process," were underway. The primary driver for the revision is internal feedback stemming from use of the SDP over the years. The draft of Appendix I is available in ADAMS at Accession No ML18257A059, and staff will be prepared to receive external stakeholder feedback at the October ROP monthly public meeting.

- The NRC staff provided an update on the ongoing revision of IMC 0609, Appendix M, “Significance Determination Process Using Qualitative Criteria.” The update is consistent with what was described earlier this year in Enclosure 2 of SECY-18-0045, “Reactor Oversight Process Self-Assessment for Calendar Year 2017.” Industry clarified that its ROP Enhancement Recommendation 3C, “Terminate App M Revision,” was referring to the more comprehensive Appendix M revision that had been discussed previously rather than the targeted Appendix M revision that is currently underway. The draft revision to Appendix M is publicly available in ADAMS at Accession No. ML18257A025, and staff will be prepared to receive external stakeholder feedback at the October ROP monthly public meeting.
- Staff discussed an ongoing effort to sunset IMC 0609, Appendix O, “Significance Determination Process for Mitigating Strategies and Spent Fuel Pool Instrumentation,” and place the screening criteria from that appendix into IMC 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power.” Appendix O was initially developed to address situations in which more detailed risk assessment tools and practices had not yet been developed, but improvements have been, and are still being, made in this area. There was significant discussion with industry on whether Appendix L, “B.5.b Significance Determination Process,” should also be combined into Appendix A. NRC staff acknowledged the similarity between issues that would be handled by Appendices L and O, but also noted that FLEX equipment (Appendix O) has been adopted into plant operations to a larger extent than B.5.b equipment (Appendix L), and the staff ultimately believes this difference warrants keeping Appendix L as a separate document. This change will not actually take place until issuance of Attachment 4 and Appendix A revisions in 2019.
- The NRC staff discussed that a memorandum is being generated by the ROP Assessment Branch to address how to treat issues identified through Temporary Instruction 193, “Inspection of the Implementation of EA-13-109: Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions – Effective Date: January 1, 2018,” in the SDP. This memorandum will provide clarification on how to apply existing guidance to facilitate efficient handling of findings, while an ROP feedback form will also be submitted to address two instances where the existing guidance is incomplete (to be addressed in a future revision of the IMCs).

#### Supplemental Guidance for Common Cause Failure

Draft supplemental guidance on the treatment of common cause failure for the SDP was recently issued and is available in ADAMS at Accession No. ML18260A249. The NRC staff is seeking external stakeholder comments and both industry and staff agreed that a public meeting on this topic is warranted.

#### NEI 99-02 Frequently Asked Questions (FAQs) and White Papers

There were no performance indicator FAQs open at the time of the meeting. Following the July 19, 2018, ROP monthly public meeting, the staff held a public teleconference on August 20, 2018, to discuss FAQ 18-04, “ANO-1 Scram One-Time Exemption Request,” and completed its review. The final approved FAQ is available in ADAMS at Accession No. ML18232A233.

The staff also provided an update on its review of one open white paper associated with the emergency preparedness cornerstone, "Drill/Exercise Performance Indicator – Initial Notification Form Accuracy Whitepaper." This white paper was initially submitted at the April 5, 2018, ROP monthly public meeting. Following discussion of the white paper at the July 19, 2018, ROP public meeting and a subsequent public meeting on August 28, 2018, NEI submitted an updated version of the white paper (ADAMS Accession No. ML18254A348). The NRC staff is in the process of reviewing the latest version of the white paper.

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING GROUP  
PUBLIC MEETING HELD ON SEPTEMBER 20, 2018 OCTOBER 1, 2018

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**ADAMS ACCESSION NO.S: ML18271A086 (package)**

**ML18271A089 (memorandum) \*via e-mail**

<b>OFFICE</b>	NRR/DIRS/IRAB	BC:NRR/DIRS/IRAB
<b>NAME</b>	AGarmoe*	GBowman*
<b>DATE</b>	10/01/18	10/01/18

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
September 20, 2018**

Deann Raleigh	Curtiss Wright	Andy Hon	NRC
Larry Parker	STARS Alliance	Matt Humberstone	NRC
Eric Katzman	NextEra Energy	Tim Reed	NRC
David Gudger	Exelon	Don Johnson	NRC
Mike Murray	STP	Eric Schrader	NRC
Roy Linthicum	PWR Owners Group	Alonzo Richardson	NRC
Marty Murphy	Xcel Energy	Patricia Silva	NRC
Chris Nolan	Duke Energy	C. J. Fong	NRC
Harry Balian	PSEG Nuclear	Eric Thomas	NRC
Danny McGinnis	Dominion Energy	Ching Ng	NRC
Ken Heffner	Certrec	Joylynn Quiñones	NRC
Scott Diven	Exelon	David Aird	NRC
James Slider	NEI	Alex Garmoe	NRC
Tony Zimmerman	Duke Energy	Jeremy Groom	NRC
Jeff Robertson	Duke Energy	Ross Telson	NRC
Jason Jennings	Talen Energy	Russell Gibbs	NRC
Jerry Hiatt	NEI	Donald Helton	NRC
Robin Ritzman	FENOC	Greg Bowman	NRC
James Pak	Dominion Energy	Chris Miler	NRC
Rob Burg	EPM, Inc.	Tom Hipschman	NRC
		Antonios Zoulis	NRC
		Gerond George	NRC
		Julio Lara	NRC
		Mary Anderson	NRC
		Raymond Gibson	NRC
		Marlone Davis	NRC