



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

May 5, 2021

MEMORANDUM TO: Anthony D. Masters, Chief  
Reactor Assessment Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

FROM: Tekia V. Govan, Project Manager /RA  
Reactor Assessment Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY  
PUBLIC MEETING HELD ON APRIL 21, 2021

On April 21, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with the Nuclear Energy Institute's (NEI's) Reactor Oversight Process (ROP) Task Force executives, and other senior industry executives, to discuss the staff's progress on the ROP initiatives. The topics discussed during this teleconference are described below.

**Performance Indicator (PI) Frequently Asked Questions (FAQ)**

*FAQ 21-02: Counting DEP Opportunities from an Emergency Following a Retraction of the NRC Emergency Notification*

This FAQ was submitted to the NRC staff in February 2021. As a result of the staff's review and subsequent discussions on this FAQ at the March/April 2021 ROP meetings, the staff has transitioned FAQ 21-02 to "Final Approved" status with no additional comments or changes requested (ADAMS Accession Number ML21117A104).

*FAQ 21-03: ANS Guidance Following IPAWS (ADAMS Accession Number ML21077A133)*

The NRC staff is still trying to develop an approach for the licensees to submit ANS-PI data for sites that transition to the IPAWS system. For now, the NRC staff requested licensees to leave the ANS-PI entry blank and add a note stating that, "Sirens are not part of the site's primary ANS. ANS will be inspected via IP 71114.02."

There is a system challenge between the INPO-IRIS system data file creation and the data processing within the internal NRC-RPS system. For 2021Q1, the NRC staff will perform a

CONTACT: Tekia V. Govan, NRR/DRO  
301-415-6197

workaround to process the PI data until permanent solution is determined. The staff plans to discuss this FAQ at an upcoming ROP public meeting to provide an update or a proposed response. The staff mentioned during the meeting that they are taking into consideration the exchange of the EP Maintenance PI from one based on ANS to one based on emergency response facilities and therefore inspect ANS via IP 71114.02 versus a PI. The staff will continue discussions on this topic at a future meeting.

### **Significance Determination Process Update – Appendix D**

The NRC staff provided a status update regarding the efforts to revise the Public Radiation Safety Significance Determination Process (SDP) documents: 1) Inspection Manual Chapter (IMC) 0609, Appendix D, “Public Radiation Safety Significance Determination Process;” and 2) IMC 0308, Attachment 3, Appendix D, “Technical Basis for Public Radiation Safety Significance Determination Process.” The staff communicated that with this update to the Public Radiation Safety SDP and basis documents, the staff plans to add guidance to enable staff to disposition violations of 10 CFR Part 37, “Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material,” under the ROP. The inclusion of guidance for 10 CFR Part 37 in this SDP would fully incorporate 10 CFR Part 37 into the ROP since guidance for the inspection of 10 CFR Part 37 is already including in the baseline inspection program for the ROP. In addition, the staff plans to add additional guidance for dispositioning transportation related inspection findings under the ROP. Specifically, the staff intends to add guidance to address instances when a licensee uses incorrect packaging for radioactive material during transportation because currently the SDP assumes that the correct packaging is being used and that then a performance deficiency occurs. Furthermore, the staff intends to add guidance to clarify the significance of inspection findings under certain circumstances such as when licensees provide incorrect emergency response documentation to drivers for radioactive material shipments.

The staff communicated that two separate public meetings were held to focus on staff’s plans to update the Public Radiation Safety SDP. The staff’s initial public meeting was held on October 21, 2020, and the most recent public meeting was held on February 25, 2021. In preparation for the most recent public meeting, the staff made the current drafts of the SDP and basis documents publicly available to allow external stakeholders to provide feedback to the NRC staff (ADAMS Accession No. ML21049A364). After the February 25, 2021, public meeting, NEI provided feedback on the draft SDP and basis documents for the staff’s consideration via a letter dated April 9, 2021 (ADAMS Accession No. ML21104A411). The staff informed NEI that they are currently considering this feedback.

Finally, the staff informed stakeholders that they are currently working on a COMSECY scheduled to be complete by late July 2021. This communication with the Commission is consistent with NRC guidance contained in Management Directive (MD) 8.13, “Reactor Oversight Process.” The intent of the COMSECY is to request Commission approval to add guidance in the SDP and basis documents for dispositioning 10 CFR Part 37 issues. In addition, the COMSECY would also be used to notify the Commission of proposed SDP and basis document updates for the inclusion of additional guidance for dispositioning transportation related issues.

During this discussion, an industry representative asked whether the staff intended to share another draft of the SDP and basis documents prior to the issuance of the updated guidance. The staff informed stakeholders that currently there are no plans to make another draft of the documents publicly available. The reason for this is because it is not anticipated that the

documents will change significantly after considering the NEI feedback. In addition, the draft versions that were made publicly available have already dispositioned all internal NRC feedback and comments.

### **Announcement of Meeting - Common Cause Failure in the Significance Determination Process**

The NRC staff announced a public meeting with the nuclear industry on May 11, 2021, at 10am. This meeting is being held to share research results on casual alpha factor methods and to address NRC stakeholders' comments about common cause failure in the significance determination process. In preparation for this meeting, the NRC staff released its work summary and conclusion, entitled, "Common Cause Failure Work Summary and Conclusions" (ADAMS Accession No. ML21055A027).

### **Industry Lessons Learned from COVID Pandemic**

NEI provided a presentation on the industry's experience in responding to and supporting NRC inspections during the widespread use of remote and hybrid inspections as a result of the COVID pandemic (ADAMS Accession No. ML21110A707). The presentation focused on key learning areas such as the need for industry collaboration, adaptation of remote work, use of technology, relying on processes, and considering the "new normal." During the meeting, the NRC staff asked if NEI would be sharing their report on industry lessons learned from the COVID pandemic. Industry indicated that they hope to share such document in the future. Following the meeting, NEI agreed to provide a presentation on this report during the May 2021 ROP meeting.

### **Meeting Action Items**

No actions.

### **Communicating with the NRC staff**

At the start of all ROP public meetings, the project manager provides contact information for the public to use to provide their name as a participant in the meeting. This contact information is also provided for submitting questions and comments to the NRC technical staff. Please note that any questions and/or comments pertaining to the ROP project can be sent to [Tekia.Govan@nrc.gov](mailto:Tekia.Govan@nrc.gov). Questions and/or comments will be forward to the appropriate NRC staff. The staff also mentioned the role out of the "Contact Us about ROP" page on the new ROP website, which can also be used to submit questions and comments regarding the ROP initiative (<https://www.nrc.gov/reactors/operating/oversight/contactus.html>).

### **Conclusion**

At the end of the meeting, NRC and industry management gave closing remarks. NEI expressed appreciation for the open dialogue and willingness of NRC staff to hear industry views. The NRC management stressed the importance of the NRC being focused on providing

reasonable assurance of public health and safety when considering changes to the ROP.

The enclosure provides the attendance list for this meeting.

Enclosure:

As stated

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING ON APRIL 21, 2021

**DISTRIBUTION:**

RidsRgn1MailCenter  
 RidsRgn2MailCenter  
 RidsRgn3MailCenter  
 RidsRgn4MailCenter  
 RidsNrrOd  
 RidsNrrDirs  
 RidsNrrDirslrab  
 RidsNrrDirslrib  
 RidsNrrDirslrgb  
 RidsOpaMail  
 RidsNrrDraAphb  
 RidsACRS\_MailCTR  
 RidsOgcMailCenter

ADAMS Accession No.: **ML21125A643**

\* = via email

OFFICE	NRR/DRO/IRAB/PM	NRR/DRO/IRAB/BC	NRR/DRO/IRAB/PM
NAME	TGovan*	AMasters*	TGovan*
DATE	05/05/2021	05/05/2021	05/05/2021

**OFFICIAL RECORD COPY**

## LIST OF ATTENDEES

### REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING

**April 21, 2021, 10:00 AM to 11:00 AM**

<b>Name</b>	<b>Organization<sup>1</sup></b>	<b>Name</b>	<b>Organization</b>
Jean Fleming	PSEG	George Smith	NRC
Dan Shannon	Dominion Energy	Billy Gleaves	NRC
Jim Slider	NEI	Deann Raleigh	NRC
Matthew Euten	Unknown	Mike King	NRC
Julie Ezell	Unknown	Mohammed Shuaibi	NRC
James Pak	Dominion Energy	Patricia Pelke	NRC
Robin Ritzman	Curtiss-Wright	Mike Franovich	NRC
Karen Kim-Stevens	EPRI	Stephen Campbell	NRC
Chris Nolan	Unknown	Tekia Govan	NRC
Steve Catron	NextEra	Chris Miller	NRC
Cheryl Ann Gayheart	Unknown	Micheal Smith	NRC
Tony Zimmerman	Duke Energy	Shakur Walker	NRC
Jeff Rady	Unknown	Jeffrey Bream	NRC
Andrew Mauer	NEI	Anthony Masters	NRC
David Gudger	Exelon	Thomas Hipschman	NRC
Daniel McGinnis	Dominion Energy	Don Johnson	NRC
Marty Phalen	NEI	Marc Ferdas	NRC
Ryan Lighty	Unknown	Michael Montecalvo	NRC
Steven Dolley	SP Global	Ed Miller	NRC
Larry Nicholson	Certrec	Charles Murray	NRC
Faramarz Pournia	Unknown	Coleman Curran	NRC
Elliot Rosenfeld	Unknown	Kevin Hsueh	NRC
Glenn Dental	Unknown	Russ Gibbs	NRC
Nicole Good	Star Alliance	Ami Agrawal	NRC
Isaac Mulhern	Unknown	Gregory Suber	NRC
Drew Richards	Unknown	Christopher Cauffman	NRC
Harry Balian	PSEG	Dan Merzke	NRC
Russell Thompson	TVA	Joylynn Quinones- Navarro	NRC
Lindsey Grissom	Unknown	Jasmine Gilliam	NRC
Elizabeth Langille	Unknown	Diana Betancourt- Roldan	NRC
Ronnie Surber	Ronnie Surber	Russell Felts	NRC
Mandy Ludlam	Mandy Ludlam	Douglas Bollock	NRC
Terrence Reis	Unknown	Paul Goldberg	NRC

<sup>1</sup> Unknown organization indicates that the participant's affiliation was not provided by the issuance of this meeting summary.

<b>Name</b>	<b>Organization</b>	<b>Name</b>	<b>Organization</b>
Mandy Halter	Entergy	Ken Kolaczyk	NRC
Kari Osbourne	Unknown	Robert Kahler	NRC
Jorge Corujo-Sandin	Unknown	Jamie Heisserer	NRC
Jordon Glisan	Unknown	Eric Bowman	NRC
Robert Ruiz	Unknown	Eric Duncan	NRC
		Ching Ng	NRC
		Alex Garmoe	NRC
		Tim Riti	NRC
		Eric Schrader	NRC
		Ty Ospino	NRC
		Bill Maier	NRC
		Derek Widmayer	NRC
		Greg Warnick	NRC
		Jamnes Cameron	NRC
		Richard Skokowski	NRC
		Josephine Ambrosini	NRC
		Daniel Collins	NRC
		Michael Brown	NRC
		Matthew Horn	NRC