

February 11, 2000

MEMORANDUM TO: Cynthia A. Carpenter, Chief
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

FROM: Dennis P. Allison, Senior Reactor Systems Engineer/**AR**/
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: NOTICE OF PUBLIC MEETING ON PROPOSED CHANGES TO EVENT
REPORTING REQUIREMENTS IN 10 CFR 50.73 AND ASSOCIATED
GUIDANCE

DATE AND TIME: February 25, 2000
9:00 a.m. - 5:30 p.m.

LOCATION: U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852
Room T-10A1

PURPOSE: The NRC staff will discuss plans for and exchange views on proposed final changes to 10 CFR 50.73 and associated guidance for nuclear power reactors. The focus of discussions will be the provisions of the proposed rule (64 FR 36291, 7/6/99) relating to reporting of degraded or nonconforming components and how the staff proposes to modify those provisions in response to the public comments received on the proposed rule. (See attached agenda)

PARTICIPANTS: NRC: Cynthia Carpenter, Dennis Allison, Melinda Malloy, et. al.
PUBLIC: Any interested member of the public¹

Attachment: Proposed Agenda

cc w/att: See next page

¹ This meeting is open to participation by all interested members of the public. To ensure adequate meeting accommodations, members of the public who wish to attend should contact Dennis Allison at (301) 415-1178 or dpa@nrc.gov no later than February 24, 2000.

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February 11, 2000

MEMORANDUM TO: Cynthia A. Carpenter, Chief
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

FROM: Dennis P. Allison, Senior Reactor Systems Engineer/RA/
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: NOTICE OF PUBLIC MEETING ON PROPOSED CHANGES TO EVENT
REPORTING REQUIREMENTS IN 10 CFR 50.73 AND ASSOCIATED
GUIDANCE IN NUREG-1022

DATE AND TIME: February 25, 2000
9:00 a.m. - 5:30 p.m.

LOCATION: U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852
Room T-10A1

PURPOSE: The NRC staff will discuss plans for and exchange views on proposed
final changes to 10 CFR 50.73 and the guidance in NUREG-1022 for
nuclear power reactors. The focus of discussions will be the provisions of
the proposed rule (64 FR 36291, 7/6/99) relating to reporting of degraded
or nonconforming components and how the staff proposes to modify
those provisions in response to the public comments received on the
proposed rule. (See attached agenda)

PARTICIPANTS: NRC PUBLIC¹
C. Carpenter Any interested member of the public
D. Allison
M. Malloy, et. al

Attachment: Proposed Agenda

cc w/att: See next page

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Dennis Allison at (301) 415-1178 or dpa@nrc.gov no later than February 24, 2000.

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Working group (via e-mail)

PUBLIC MEETING ON EVENT REPORTING REQUIREMENTS

February 25, 2000

Proposed Agenda

1. Opening Remarks (NRC) & Introductions (All)
2. Summary of:
 - (a) the language of proposed rule (64 FR 36291, 7/6/99) and associated guidance relating to the deletion of the requirement to report conditions outside the design basis of the plant and the proposed requirement relating to reporting degraded or nonconforming components (as discussed during ACRS meeting on February 3, 2000),
 - (b) questions posed in the proposed rule on these changes, and
 - (c) summary of public comments received on these changes.
3. Review and explanation of draft final rule language and guidance points and implementation examples. (See attached pages.)
4. Questions and open discussion
5. Closing Remarks (NRC, All)

Attached pages:
Excerpts for Discussion

Excerpts for Discussion

Criterion:

Any event or condition that ... Required corrective action for a single cause or condition in order to ensure the ability of more than one train or channel to perform its specified safety function.

Guidelines:

This criterion requires reporting of an event or condition that required corrective action for a single cause or condition in order to ensure the ability of more than one train or channel to perform its specified safety function. It pertains only to written LERs. Telephone notifications are not required under this criterion.

For events of this type, the "reporting clock" does not start until it is determined that the event or condition requires corrective action for a single cause or condition in order to ensure the ability of more than one train or channel to perform its specified safety function. It is not possible to know whether an event is reportable under this criterion until that point is reached. Once the determination is made, a written LER is required within 60 days.

This criterion involves corrective actions taken for significant conditions adverse to quality, as required by 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action." However, it does not include those cases which only involve the checking of multiple trains or channels to determine whether there is a need for action. For example, if one train of a system fails as a result of a sticky solenoid operated valve, it is prudent to check other trains to see if there is a common problem. After checking, if no further action is required to ensure the ability of multiple trains to perform their safety functions, the event is not reportable under paragraph (a)(2)(ii)(C).

This criterion applies to common cause problems that span more than a single train or channel. It may apply to two trains or channels in one system, or it may apply to one train or channel in one system and another train or channel in another system. This is true regardless of whether or not the trains or channels have the same safety function and/or the trains or channels are assumed to be independent in the plant's safety analyses. For example, if it is necessary to correct a single cause or condition to ensure the ability of Train A of the an auxiliary feedwater system and Train A of a high pressure safety injection system to perform their safety functions, paragraph (a)(2)(ii)(C) applies. This is the case even though the two trains have different safety functions and may not be assumed to be independent in the plant's safety analysis.

Examples:

- (1) A motor operated valve in one train of the RHR/LPCI system was found with a crack 75 percent through the stem. The root cause was environmentally assisted stress corrosion cracking. This resulted from installation of an inadequate stem material, in both trains, as part of a plant modification package, about 14 years earlier. Pending replacement with better material, the valve stems in both trains were replaced with new stems. (Although the new stems were of the same material, they provided for

considerable time before failure could be expected.) The event would be captured by this criterion because replacement of the valve stems in both RHR trains was necessary to ensure their ability to perform their specified safety functions.

- (2) It was determined that a number of liquid-filled and isolated containment penetration lines were not adequately designed to accommodate the internal pressure buildup that could occur because of thermal expansion caused by heatup after a design basis accident. This internal pressure buildup could threaten the structural integrity of the penetrations under accident conditions. Several different corrective actions were taken, depending on the specific configurations of the penetrations. For example, for a number of penetrations, relief valves were installed. Some penetration lines were drained and procedures were instituted to ensure they would remain drained. In some lines, inboard containment isolation valves were opened to provide a pressure relief path (after meeting appropriate restrictions such as locking the outboard containment isolation valve closed). The event is reportable under §50.73(a)(2)(ii)(C) because corrective action was necessary for a single cause or condition to ensure the ability of multiple penetrations to perform their specified safety functions.
- (3) Switchyard voltage was observed to decrease below the minimum operability limit established in station procedures for both sources of offsite power. The cause was large amounts of power being transported across the grid concurrent with near peak loads. Reanalysis was performed and restrictions were placed on electrical lineups in order to support operability of the offsite power sources. The event is reportable under §50.73(a)(2)(ii)(C) because corrective action was necessary for a single cause or condition to ensure the ability of multiple offsite power sources to perform their specified safety functions.
- (4) One of three component cooling water pumps tripped due to a ground fault on the power cable leading to the pump. The likely cause was determined to be moisture permeation into the cable insulation over time, a mechanism that was not expected to occur for this type of insulation. The event would be reportable under §50.73(a)(2)(ii)(C) if it is determined that corrective action is necessary for a single cause or condition to ensure the ability of multiple pumps to perform their specified safety functions.
- (5) It was determined that numerous valves experienced over thrusting that exceeded design basis stress levels. The cause was lack of knowledge that resulted in inadequate design engineering at the time the designs were performed. Two kinds of corrective action resulted from reanalysis:
 - (i) Some valves were over stressed enough to require replacement to ensure they could perform their specified safety functions.
 - (ii) Other valves were being over stressed enough during routine operations that, although they were currently capable of performing their specified safety functions, the over stressing would, with the passage of time, render them incapable of performing those functions. These valves required modification of their control circuitry to limit stress during routine operation in order to preserve their ability to perform their specified safety functions.

The event would be reportable under §50.73(a)(2)(ii)(C) because corrective action was necessary for a single cause or condition to ensure the ability of multiple trains to perform their specified safety functions.