

April 20, 2000

Ralph E. Beedle
Senior Vice President and Chief Nuclear Officer
Nuclear Energy Institute
1776 I Street, NW Suite 400
Washington, DC 20006-3708

Dear Mr. Beedle:

In my March 20, 2000, response to your recent letter, dated March 13, 2000, I indicated that the NRC scheduled a public meeting to discuss your concerns regarding the potential unintended consequences of tracking manual scrams as a performance indicator (PI). We were particularly interested in any new information you may have had on this issue. This public meeting was conducted on March 29, 2000. Attachment 1 provides a meeting summary while Attachment 2 lists the meeting attendees.

As you know, the value of tracking manual scrams as an indicator has been discussed extensively throughout the development and implementation of the revised reactor oversight process and NEI has been fully involved in determining the state of the current PI which includes tracking manual scrams. While we received no new information during the March 29 meeting, we expressed our interest in working with NEI and other stakeholders to consider an alternate PI that tracks initiating events in a way that minimizes potential unintended consequences. It is our understanding from this meeting that NEI will (1) propose an alternative PI in the near future and (2) take the lead to reemphasize the role of the operator in maintaining plant safety.

Sincerely,

/RA/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Project No. 689

cc: See next page

Attachments: As stated

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Summary of Public Meeting on Manual Scrams

A public meeting was held on March 29, 2000, at the Capital Hilton following the Regulatory Information Conference to discuss NEI's concern related to tracking manual scrams as a performance indicator (PI). The meeting began with introductions by selected stakeholders (as indicated by an asterisk on the Attendance List (Attachment 2)) seated at the main table. After introductions, the selected stakeholders discussed the role of the PI associated with the initiating events cornerstone of safety, the basis for the Unplanned Scrams per 7000 Critical Hours PI (that includes both automatic and manual scrams), and the results of stakeholder feedback provided to-date. The meeting concluded after other stakeholders were given an opportunity to voice their views and the agreed upon action items were reviewed.

While participants expressed support for the initial implementation of the revised reactor oversight process (RROP), NEI and several industry participants voiced concerns regarding the potential unintended consequences that could result, namely that operators could be influenced to make a non-conservative decision to not initiate a manual scram in order to prevent crossing the PI threshold. The Professional Reactor Operator Society representative expressed his strong belief that operators would take appropriate conservative actions, as this is what they were trained to do, and that manual and automatic scrams should be treated equally since they present the same challenge to the plant. The State of Illinois representative was concerned that if this last-minute issue was handled outside the process, it would give the appearance of circumventing the open, public process used to develop the PIs. The Union of Concerned Scientist representative raised the issue that there are other PIs that could potentially cause unintended consequences and that other plant personnel besides operators could thus be influenced to make non-conservative decisions.

As a result of the meeting, NRR committed to use a formal PI change process to consider, on a priority basis, an alternate PI(s) that tracks initiating events in a way that minimizes potential unintended consequences. NEI agreed to submit a proposal for an alternate PI for initiating events for the staff to consider. NEI also agreed to take the lead in working with industry senior managers to reemphasize the role of the operator in maintaining plant safety and that PIs and other potential issues should not unduly influence conservative decision making.

ATTENDANCE LIST FOR MEETING ON MARCH 29, 2000

<u>NAME</u>	<u>ORGANIZATION</u>
Michael Johnson	NRC/NRR
Frank Gillespie	NRC/NRR
Alan Madison	NRC/NRR
W. T. Cottle	STP NOC
Marvin Fertel	NEI
Phylus Rich	NEI
Stan Maingi	PA-BRP
Richard Sweigart	Duke Energy
Faridch Saba	NUSIS
Lynne Neal	NEI
Gareth Parry	NRC/NRR
Don Hickman	NRC/NRR
Dave Allsopp	NRC/NRR
Eric Dixon	NII
Herb Fontecilla	VA Power
Deann Raleigh	Serch, Bechtel Power
Mike Callahan	GSI
Roger Huston	LSS
Mark Satorius	NRC/OEDO
Glenn Tracy	NRC/OCM/RAM
Nathan L. Haskell	Consumers Energy
Cornelius Holden	NRC/NRR
R. M. Krick	ComEd
Jon Johnson	NRC/NRR
Ralph Beedle	NEI
C.S. Hinnant	CP&L
S. Unglesbee	NEI
Mark Peifer	INPO
Ron Eaton	H&P, Inc.
Tom Houghton	NEI/HTP
Steve Floyd	NEI
Paul Blanch	Self
Mahfred Petroll	Self
Serita Sanders	NRC/NRR
Sidney Crawford	Consultant
David Stellfox	McGraw-Hill
Leslie Collins	ABB CENP
Paige Negis	GE Nuclear
Joel Sorensen	NSP
Samuel Collins*	NRC/NRR
William Dean*	NRC/NRR
David Lochbaum*	UCS
Cecil Settles*	Illinois Dept of Nuclear Safety
David Flower*	PROS
Joe Colvin*	NEI
Oliver Kingsley*	Commonwealth Edison Co.

*indicates meeting attendees who formed the topic discussion group

cc: Mr. David Lochbaum
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Union of Concerned Scientists
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