



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 2, 2000

MEMORANDUM TO: Stuart A. Richards, Director
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
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Office of Nuclear Reactor Regulation *J. Cushing*

SUBJECT: SUMMARY OF MEETING WITH THE COMBUSTION ENGINEERING
OWNERS GROUP (CEOG) TO DISCUSS REGULATORY CREDIT
FOR SELF ASSESSMENTS

On March 2, 2000, the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives of the CEOG to discuss credit for licensees' self assessments in the engineering area and in the new reactor oversight process. Attachment 1 is a list of the meeting participants. Attachment 2 is a copy of the meeting slides.

The purpose of the meeting was for the CEOG to brief the staff on the self assessments that the CEOG has conducted and their current plans and the goals for the future. Mr. Gary Detter, Chairman of the CEOG Resource Sharing Task Force, presented the CEOG program.

The CEOG has established a self assessment program that primarily uses industry experts from member utilities and from ABB-CE to conduct assessments at the request of the other CEOG member utilities. The assessment guide used by the CEOG is based on the NRC inspection manual. The results and the lessons learned from the self assessment are shared among the CEOG members. The CEOG has performed six assessments in two years at five different utilities. The areas assessed include emergency core cooling system, core reload, emergency heating ventilation air conditioning, spent fuel pool, high pressure safety injection/low pressure safety injection and the main steam/feedwater and condensate system. The systems were selected based on the risk versus knowledge of the system.

Mr. Detter provided a detailed description of the 1999 core reload assessment performed at Calvert Cliffs Nuclear Power Plant (CCNPP). The group performing the assessment consisted of 15 people, two from ABB Combustion Engineering Nuclear Power, Inc., three from other utilities and 10 from CCNPP. The group was led by quality assurance personnel and included seven technical experts. The assessment did not identify any operability concerns or generate any licensee event reports. The assessment did identify that assumptions made in two calculations were poorly supported, two math errors and a few reference document status errors. The self assessment concluded that overall it was a technically sound program.

May 2, 2000

The NRC staff encourages self assessments by licensees. Mr. Holden of the NRC staff stated that the NRC is investigating credit for self assessments with the Nuclear Energy Institute (NEI), although not in the engineering area, and that the CEOG should investigate if their self assessment program could fit with the NEI program. Mr. Rickard of the CEOG replied that he would need to talk to the other CEOG members and NEI about the best approach.

Mr. Holden stated that he would like to keep the discussion going and would like to schedule another working level meeting with the CEOG. Mr. Detter said that he would be in touch, probably at the end of the summer, after discussing it with the other CEOG members.

Project No. 692

Attachments: 1. Meeting Participants
2. CEOG Slides

cc w/atts: See next page

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LIST OF ATTENDEES
MEETING WITH THE CE OWNERS GROUP
ON PROPOSED RCP SEAL MODEL DEVELOPMENT

March 2, 2000

ABB-COMBUSTION ENGINEERING OWNERS GROUP

I. Rickard
F. Ferrazaccio
G. Detter

BECHTEL

D. Raleys

NRC

J. Cushing
T. Quay
D. Dorman
C. Holden

CEOG Resource Sharing Task Force

9 stations represented

**Gary Detter, BGE
Chairman**

March 2, 2000

Purpose

- Establish groundwork for collaborative assessment of engineering by NRC & CEORG in new Regulatory Oversight Process

Key Topics

- Past Activities
- Current Plans
- Goals for the Future

Actions to Date

- Established working relationships
- Developed standard assessment guide
- Developed schedule and resource credit mechanisms
- Participated in initial assessments
- Shared results and assessment lessons learned
- Interface with NRC Region 4

Past Assessments

- 6 Assessments in 2 years @ 5 utilities
 - ◆ BGE: ECCS; Core Reload
 - ◆ SONGS: Emergency HVAC
 - ◆ Palisades: Spent Fuel Pool
 - ◆ ANO: HPSI/LPSI
 - ◆ Ft. Calhoun: Main Stm/Cond/Feed

Planned Assessments- 2000

- Palo Verde (CVCS)
- Waterford (CVCS)
- Millstone (Service Water)
- ANO (Control Room Ventilation)
- Palisades (Ultimate Heat Sink)
- Calvert Cliffs (Containment Sys.)

Outcomes

- Some technical Issues identified that required follow-up, e.g. vortex effects on ECCS pump suction
- Instrument uncertainty treatment a frequent topic
- No significant gaps leading to LER's

Case Study: CCNPP 1999 Fuel Reload Assessment

- 15 people: 2 ABB; 1 Northeast; 1 SONGS; 1 RGE; 10 CCNPP. Led by QA
- 7 technical experts w/ 20+ years experience
- Non-BGE participants ~ 1 week; BGE participants ~ 2-3 weeks
- Good synthesis of expertise; minimal “spin-up” needed
- Level of detail of assessment and documentation substantial

Case Study: CCNPP 1999 Fuel Reload Assessment

■ Results:

- ◆ No operability concerns nor LER's
- ◆ Representative outputs:
 - ✦ 2 calc assumptions poorly supported
 - ✦ 2 startup prediction math errors
 - ✦ Moderator Temp Coefficient range is not an enrichment spec input
 - ✦ A few reference document status errors

■ Overall conclusion:

- ◆ Technically sound program

Future Vision

- Scheduled assessments using mainly utility people
- Integrate with INPO/NUPIC/ other industry collective efforts
- Standardized approach providing efficient assessment
- Shared experience and lessons learned
- Collaboration w/ NRC to effectively share info and conserve resources

Prognosis

- This program can provide substantive interactions between CEOG utilities to improve quality and safety
- Internal benefits warrant continuation
 - ◆ Station's assurance of safety
 - ◆ Professional development of participants
- NRC cooperation will promote stronger Owners' Group involvement in self-assessments

Next Steps

■ NRC:

- ◆ Commit to further participation
- ◆ Establish NRC Point(s) of Contact
- ◆ Define steps to assure credibility to staff and public
- ◆ Link to new Oversight Program and integrate into inspection planning

■ CEOG

- ◆ Learn from NRC inspections
- ◆ Share schedule intentions
- ◆ Present assessment outcomes to our members & pilot to other Owners' Groups