

June 27, 2000

MEMORANDUM TO: Cynthia A. Carpenter, Chief  
Generic Issues, Environmental, Financial &  
Rulemaking Branch  
Division of Reactor Program Management, NRR

FROM: Joseph L. Birmingham, Project Manager/**RA**  
Generic Issues, Environmental, Financial &  
Rulemaking Branch  
Division of Reactor Program Management, NRR

SUBJECT: SUMMARY OF MEETING WITH NUCLEAR ENERGY INSTITUTE (NEI)  
AND INDUSTRY ON THE SIGNIFICANCE DETERMINATION  
PROCESS IN THE RADIATION PROTECTION AREA

On June 20, 2000, NRC staff met with representatives of industry and NEI to discuss issues on the significance determination process (SDP) in the radiation protection area. Attachment 1 provides a list of those attending the meeting.

Ed Fox, NRC, began the meeting with introductions and stated that the purpose of the meeting was to discuss the significance determination process, events leading to performance indicator (PI) findings, whether additional guidance was needed on PIs, and draft frequently asked questions (FAQs). Mike Russell, part of the NEI Task Force, was then asked to begin discussions for the Task Force.

Mr. Russell began by discussing the relationship of requirements in 10 CFR 20 on high radiation areas (HRAs, >1 R/h) and the corresponding requirements in licensee technical specifications. The discussion was, in part, prompted by guidance in an April 14, 2000, email from Jim Wigginton, NRC/NRR, to all NRC regional inspectors, on interim PI guidance for Part 20 requirements related to HRAs and very HRAs (VHRAs). A copy of the guidance is provided in Attachment 2. The task force agreed that the Part 20 requirements were applicable to licensee programs and that licensees must comply with them. The question was whether the specific requirements listed in the email should be considered PI findings. The Task Force did not recall these items being discussed during the PI development period nor during the pilot program. Roger Pedersen, NRC, pointed out that some of the items were specifically discussed previously. An example was whether a sign falling off a door of a high radiation area should be a finding. The Task Force agreed that the items were logical but believed the way that the items would be implemented should be discussed. The Task Force believes that, because licensee TS do not address these items consistently, the standardized technical specifications should be considered as a basis for implementing these items. The NRC believes the items are applicable under the SDP process but will review the technical specification language for applicability to these items. The Task Force agreed to prepare a draft frequently asked question (FAQ) to clarify the use of technical specification language and "comparable requirements in 10 CFR 20" and to look at TS consistency for the next meeting.

The group discussed recent events where staff and industry disagreed whether a PI finding

should be made. Among these was a question whether a failure to perform a survey of a Carpenter

- 2 -

potential HRA in a timely manner followed by a failure to post and lock the HRA in a timely manner once known should be one or two findings. Because the licensee had an opportunity to regain control of the HRA after the survey was made and because the failure to post and lock the area was egregious, the failure was properly considered a second finding. Other areas discussed included the screening process for minor document errors, inspectors re-reviewing previously reviewed findings, and a question of the importance of repetitive minor findings where corrective actions do not prevent recurrence. Also, the staff noted that the NRC staff revisions to FAQs 130-131 were still being reviewed by the regional staff.

Having no further items to discuss the meeting was adjourned.

Project No. 689

Attachments: As stated

cc: See list

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

Ms. Lynnette Hendricks, Director  
Plant Support  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

Mr. Alex Marion, Director  
Programs  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

Mr. Charles B. Brinkman, Director  
Washington Operations  
ABB-Combustion Engineering, Inc.  
12300 Twinbrook Parkway, Suite 330  
Rockville, Maryland 20852

Mr. David Modeen, Director  
Engineering  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

Mr. Anthony Pietrangelo, Director  
Licensing  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

Mr. H. A. Sepp, Manager  
Regulatory and Licensing Engineering  
Westinghouse Electric Corporation  
P.O. Box 355  
Pittsburgh, Pennsylvania 15230

Mr. Jim Davis, Director  
Operations  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708

potential HRA in a timely manner followed by a failure to post and lock the HRA in a timely manner once known should be one or two findings. Because the licensee had an opportunity to regain control of the HRA after the survey was made and because the failure to post and lock the area was egregious, the failure was properly considered a second finding. Other areas discussed included the screening process for minor document errors, inspectors re-reviewing previously reviewed findings, and a question of the importance of repetitive minor findings where corrective actions do not prevent recurrence. Also, the staff noted that the NRC staff revisions to FAQs 130-131 were still being reviewed by the regional staff.

Having no further items to discuss the meeting was adjourned.

Project No. 689

Attachments: As stated

cc: See list

Distribution: See next page

DOCUMENT: G:\RGEB\JLB\NEI MTG 6-20 RP SDP.WPD

OFFICE	RGEB	RGEB
NAME	JBirmingham	SWest
DATE	06/27/00	06/27/00

OFFICIAL RECORD COPY

Distribution: Mtg. Notice w/NEI re Radiation Protection SDP Dated June 27, 2000

PUBLIC/ADAMS

OGC

ACRS

Email

SCollins/RZimmerman

BSheron

JJohnson

BBoger/FGillespie

DMatthews/SNewberry

CCarpenter

SWest

DTrimble

RPedersen

SKlementowicz

JWhite, RI

ABoland, RII

WSlawlinski, RIII

GGood, RIV

GTracy

EFox

KGibson

MTschiltz, EDO

List of Attendees for June 20, 2000 Meeting  
Significance Determination Process

<b>NAME</b>	<b>ORGANIZATION</b>
Alan Nelson	NEI
Matthew Hassler	PSEG
Lee Thomasson	Virginia Power
Elizabeth Bogue	Consumers Energy
Travis Beard	Northern States Power
Steve Gebers	Omaha Public Power
Mike Russell	SCE
Ira M. Turner	Northeast Utilities
Willie Harris	PECO Energy
Deann Raleigh	SERCH/Bechtel Power
David Stellfox	McGraw Hill
Farideh Saba	NUSIS/Scientech
Ed Fox	NRC/NRR/IOLB
Jim Wigginton	NRC/NRR/IOLB
Roger Pedersen	NRC/NRR/IOLB
Kathy Halvey Gibson	NRC/NRR/IOLB
Charles Hinson	NRC/NRR/IOLB
Stephen Klementowicz	NRC/NRR/IOLB
Gail M. Good	NRC/R-IV
Stewart Schneider	NRC/NRR/IOLB
Steven Orth	NRC/R-III
Dave Nelson	NRC/R-III
Gary Shear	NRC/R-III/PSB
Laurie Paluso	NRC/R-I
Bernadette Baca	NRC/R-IV
Jason C. Jang	NRC/R-I
Larry Ricketson	NRC/R-IV
Michael P. Shannon	NRC/R-IV
James A. Isom	NRC/NRR/IIPB
Alan Madison	NRC/NRR/IIPB
Joe Birmingham	NRC/NRR/RGEB