

January 18, 2001

Region I Power Reactor Licensees

SUBJECT: MEETING SUMMARY - REACTOR OVERSIGHT PROCESS REGIONAL
PUBLIC MEETING

Gentleman:

This letter refers to the Reactor Oversight Process meeting conducted on December 13, 2000, at the Radisson Valley Forge Hotel and Convention Center, King of Prussia, PA. A copy of the meeting agenda, list of attendees, and panel results are enclosed. Lastly, the slides used by Mr. William Dean, "Status of the Reactor Oversight Process," are enclosed.

We believe that this meeting was beneficial, in that it provided an opportunity for NRC, licensees, state nuclear engineers, NEI, and the public to discuss the progress, challenges, and successes related to the initial implementation of the Reactor Oversight Process for Region I facilities.

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Should you have any questions concerning this meeting, please contact Mr. John Rogge at (610) 337-5146.

Sincerely,

/RA/

A. Randolph Blough, Director
Division of Reactor Projects

Enclosures:

1. Agenda
2. NRC Participants
3. External Participants
4. Performance Indicator Workshop Panel Results
5. Inspection Workshop Panel Results
6. SDP Challenges/Comments Panel Results
7. Assessment & Enforcement Panel Results
8. Status of Reactor Oversight Process Slides

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Enclosure 1- Meeting Agenda

December 13, 2000, Reactor Oversight
Program Regional Public Meeting

Meeting Agenda

- 7:30 - 8:00 a.m.** **Registration** (Ballroom Foyer)
- 8:00 - 8:20** **Welcoming Remarks**
Hub Miller, Regional Administrator, Region I, U.S. Nuclear Regulatory
Commission
William Dean, Chief, NRR Inspection Program Branch
- 8:20 - 8:30** **Workshop Ground Rules and Objectives**
John Rogge, Reactor Projects, Region I, U.S. Nuclear Regulatory
Commission
- 8:30 - 9:45** **Performance Indicator Workshop Panel**
Panel Chairman: Cliff Anderson, Region I, Reactor Projects Branch Chief
Ed Fuher, Manager, Nuclear Safety & Licensing, Three Mile Island
Donald Hickman, Operations Engineer, NRR Inspection Program Branch
Steve Floyd, Senior Director Regulatory Reform and Strategy, NEI
- 9:45 - 10:15** **Break**
- 10:15 - 11:45** **Inspection Workshop Panel**
Panel Chairman: David Lew, Region I, Reactor Safety Branch Chief
Gabe Salamon, Manager Licensing, PSEG
Jeff Jacobson, Operations Engineer, NRR Inspection Program Branch
Steve Floyd, Senior Director Regulatory Reform and Strategy, NEI
- 11:45 - 1:00** **Lunch**
- 1:00 - 2:30** **Significance Determination Process**
Panel Chairman: James Trapp, Region I, Reactor Safety SRA
Jim Peschel, Regulatory Compliance Manager, Seabrook
Peter Koltay, Operations Engineer, NRR Inspection Program Branch
Tom Houghton, Senior Project Manager, NEI
- 2:30 - 2:45** **Break**
- 2:45 - 4:00** **Assessment & Enforcement**
Panel Chairman: Michele Evans, Region I, Reactor Projects Branch Chief
James Hutton, Director, Licensing, Exelon Nuclear
William Dean, Chief, NRR Inspection Program Branch
Tom Houghton, Senior Project Manager, NEI
- 4:00 - 4:30** **Panel Chairmen Summarize Panel Results**
- 4:30 - 5:00** **Closing Remarks**
Hubert Miller, Regional Administrator, Region I, U.S. Nuclear Regulatory
Commission
William Dean, Chief, NRR Inspection Program Branch

Enclosure 2 - NRC Participants

NAME	TITLE/SITE
Hub Miller	Regional Administrator
Randy Blough	Director, Division of Reactor Projects
Wayne Lanning	DRS, Director
Dan Dorman	DRS, Acting Deputy Director
Cliff Anderson	DRP, Branch Chief
Curt Cowgill	DRP, Branch Chief
Larry Doerflein	DRS, Branch Chief
Michele Evans	DRP, Branch Chief
David Lew	DRS, Branch Chief
Jim Linville	DRS, Branch Chief
John Rogge	DRP, Branch Chief
Bill Ruland	DRS, Branch Chief
John White	DRS, Branch Chief
James Trapp	DRS, Senior Reactor Analyst
William Dean	NRR, Chief, NRR Inspection Program Branch
Donald Hickman	NRR Inspection Program Branch
Jeff Jacobson	NRR, Operations Engineer
Peter Koltay	NRR, Operations Engineer
Steve Barr	WCAC
Thomas Burns	DRS, Reactor Inspector
Joe Carrasco	DRS, Reactor Inspector
Len Cline	DRS, Reactor Inspector
Marie Miller	DMNS
Barry Norris	DRS, Sr. Reactor Inspector
Wayne Schmidt	DRS, Sr. Reactor Inspector
Tracy Walker	DRS, Sr. Reactor Inspector

Enclosure 2 - NRC Participants

Glenn Dental	Beaver Valley
Dave Beaulieu	Calvert Cliffs
Rick Skokowski	FitzPatrick
Chris Welch	Ginna
Joe Schoppy	Hope Creek
Pete Drysdale	Indian Point
Art Burritt	Limerick
Tony Cerne, Steve Jones	Millstone
Gordon Hunegs	Nine Mile Point
Laura Dudes, T. Hipschman	Oyster Creek
Tony McMurtray	Peach Bottom
Richard Laura	Pilgrim
Glenn Dental	Salem
Ray Lorson	Seabrook
Sam Hansell	Susquehanna
Dan Orr	Three Mile Island
Ed Knutson	Vermont Yankee

Enclosure 3 - External Participants

NAME	TITLE/ DEPARTMENT	ORGANIZATION
Robert Allen	Manager Regulatory Affairs	Con Edison (Indian Point)
Robert W. Boyce	Director, Nuclear Oversight	Exelon Generation
Robin Brown	Manager Reg Assurance	Exelon Generation
John Carroll	POSRC Chair Plant Gen Mgr Asst	Calvert Cliffs
Tom Cleary	Sr. Licensing Eng Regulatory Affairs	NNECO (Millstone)
Michael Crowthers	Sr Engineer Nuclear Licensing	PPL Susquehanna
Charles Dempsey	Process Owner-Assett Production	NNECO (Millstone)
Pamela T. Dunston	Exper Assmt LGS	Exelon Generation
Douglas Ellis	Senior Engineer-Regulatory & Industry Affairs	Pilgrim Station (Entergy Nuclear)
Duane L. Filchner	Senior Engineer Nuclear Licensing	PPL Susquehanna
Edwin Firth	Sr. Licensing Eng	Entergy (Indian Point 3)
Steve Floyd	Senior Director Regulatory Reform and Strategy	NEI
Dave Foss	Experience Assesment	Exelon Generation
Ed Fuhrer	Mngr, Regulatory Assurance	TMI (AmerGen)
Brian Haagensen	NRC Contractor	
Ed Harms	Asst Operations Superintendent	Vermont Yankee Nuclear Power
William Hoffner	Process Owner Operations	NNECO (Millstone 3)
Tom Houghton	Senior Project Manager	NEI
James Hutton	Director Licensing	Exelon Generating Corp
Rich Janati	Chief, Division of Nuclear Safety	PA DEP/BRP
Joseph Malone	Consultant Engineer	Seabrook (NAESCO)
Alex Marion	Director, Licensing and Programs	NEI
Robert McMahon	Commissioner Bureau of Emerg Services	Putnum County Bureau of Emerg Services
John Nagle	Licensing Engineer	PSEG (Salem/Hope Creek)
Henry Oheim	Dir Design Eng	Entergy (Pilgrim)
James Peschel	Regulatory Programs Manager	Seabrook (NAESCO)
Rich Pinney	Nuclear Engineer	NJ DEP
Robin Ritzman	Licensing Engineer	PSEG (Salem/Hope Creek)

Gabe Salamon	Manager Licensing	PSEG
Brian Sepelak	Supervisor, Regulatory Comp.	Beaver Valley Power Station (First Energy)
Gene St. Pierre	Station Director	Seabrook (NAESCO)
Larry Rau	Reliability & Safety Supervisor	Seabrook (NAESCO)
James Slider	Principal-Operations	TevaMetrics
Craig Sly	Sr. Eng - Nuclear Reg Matters	Constellation Nuclear
Marlene Taylor	Sr. Prgm Mngr	Exelon
Lori Tkaczyk	Emerg Plan Coord	Vermont Yankee
Paul Willoughby	Team Leader Reg Affairs	NNECO (Millstone)
Denise Wolniak	Manager,Licensing	NMP
George Wrobel	Manager, Nuclear Safety & Licensing	Ginna Station (Rochester Gas & Electric Corp)
Dennis Zannoni	Supervisor, NJ DEP	NJ

Enclosure 4 - Performance Indicator Workshop Panel Results

PERFORMANCE INDICATORS

Successes

- The Performance Indicators (PIs) are available for all stakeholders on the Web page.
- PIs are an important part of the new program.
- PIs have objective criteria.
- PI data can be collected consistently and in a timely manner.
- Frequently Asked Questions (FAQs) have helped ensure consistency in the PI program.
- PIs have helped improve licensee behavior in some areas and focused attention on areas that may need improvement (e.g., Emergency Planning, Security)

Challenges

- The Performance Indicators (PIs) do not always correlate with risk.
- PIs should have ties to Maintenance Rule data.
- PI information should be defined on the Web page so that all stakeholders may clearly understand what is meant by the PI data.
- Is the PI program working as intended based on the high number of green PIs at plants?
- Too many changes to the PIs without adequate justification can jeopardize stakeholder confidence in the PIs.
- Thresholds for PIs are too high, especially the threshold of 25 unplanned scrams.
- There are no PIs for cross-cutting issues.
- Differences in the INPO and WANO indicators and the PIs.
- Initiating Events and Mitigating Systems PIs need to be strengthened.
- The unavailability PI for some systems is more restrictive than the plants Technical Specifications.
- Some licensees are attempting to use technicalities in PI definitions and descriptions to avoid counting hits against the PIs.
- Many of the Frequently Asked Questions (FAQs) address only plant specific rather than generic issues.

Enclosure 4 - Performance Indicator Workshop Panel Results

Questions/Comments

- Is the public able to participate in the Frequently Asked Questions (FAQs) process? **Yes, questions should be forwarded to Don Hickman in the NRR, Inspection Program Branch. Don's e-mail address is DEH2@NRC.gov. His phone number is (301) 415-8541.**
- Why is the unplanned scrams PI being changed regarding manual scrams? **This PI is being changed to address the concern about reactor operators possibly hesitating to initiate a manual scram to avoid taking a hit against the PI.**
- Are there any comments or suggestions for changes to NEI 99-02, "Regulatory Assessment Performance Indicator Guideline?" **None were noted at this Public Workshop.**

Enclosure 5 - Inspection Workshop Panel Results

Focus

Good inspection focus on risk significant areas, however compliance still addressed (Success)

NRC should look at licensee performance from a higher level (Comment)

While the program does not cumulate green findings, some licensees are trending these findings as a leading indicator

Focus on NCVs may not be appropriate (Challenge)

Need more followup on resolution of green issues (Challenge)

Need to focus on Crosscutting issues - should address at a lower threshold (Comment)

Need more experience with the new program to assess: (Comment)

the premise that smaller problems will precede larger ones
time adequacy for response to small problem before big problems particularly with crosscutting issues

Ensuring that PIs and inspections are integrated (Comment)

Level of Effort

Level of effort ... high ... low (Challenge)

Relatively few inspection findings for the level of effort expended.

Inspection effort should be adjusted based on risk significance not number of findings

Too much focus of radiological inspections

Public confidence value is a factor to be considered

Inspection hours at some sites higher, have not seen reduction at some sites despite PIs.

Some inspections possibly duplicative of PIs

Some inspections are too frequent and become burdensome when coupled with other activities, i.e, INPO evaluations

Emergent issues can impact the level of effort in certain area (Comment)

Inspection hours expended should be made available to public in a timely fashion to enhance public confidence (Comment)

Enclosure 5 - Inspection Workshop Panel Results

Communications/Inspection Reports

Communication/Inspection reports - working well (Success)

Oral communications (resident and visiting inspectors) have been excellent and the dialogue/feedback is critical, particularly with shorter reports

Well defined thresholds for documentation/response (Success)

Improve consistency in report documentation (manual chapter 0610*) (Challenge)

No color findings - need to better define

Address errors of co-mission - not treated well in the program

Inspection Scheduling

Communication and coordination of inspection schedules with licensees - positive (Success)

Schedule changes need to be better communicated to external stake holders (Challenge)

Team inspections have significant impact (Challenge)

Explore ways to reduce unnecessary burden of teams

Provide better advance notice for licensee's budgeting purposes

Procedures

Inspectors generally are adhering to inspection procedures (Success)

Some procedures (team related procedures) are not detailed and provide too much flexibility, hinders licensee's preparation for inspections (Challenge)

Some flexibility is needed for certain procedures to ensure inspection effectiveness (Comment)

Enclosure 6 - SDP Challenges/Comments Panel Results

SDP CHALLENGES/COMMENTS

- Many positive comments/feedback on the SDP process. Process was objective, focused and thresholds were appropriate
- Comments/statements regarding areas where improvements are currently in progress
 - Enhance the guidance in the Fire SDP for defining a credible fire
 - Improve the safeguards SDP to address OSRE findings
 - Improve the containment SDP
 - Completion of the revised Phase 2 worksheets are needed/this should address some of resource issues currently involved with the SDP phase 3 evaluations
 - Unintended consequences of ALARA job estimates in that the current SDP would encourage higher job estimates/Group 2 ALARA question regarding 3 year rolling average inappropriately eliminates some ALARA deficiencies from ever being documented
- Comments/SDP Enhancements:
 - Add a SDP frequently asked questions (FAQ) and lessons learned to the ROP web page
 - Encourage inspectors to communicate potential non-green findings to the licensee as early as possible
 - A better definition of credible would be helpful in determining if an issue should be documented
 - Comments about the Green/White threshold - received comments that it may be too low/high
 - It appears that there are significant differences among plants and between regions on the number of Green issues documented.

Enclosure 7 - Assessment & Enforcement Panel Results

Of all the panels conducted, there was minimal discussion during the Assessment and Enforcement Panel. In general, successes regarding assessment and enforcement in the new process were:

- There has been a reduction of the regulatory burden for issues of lower significance.
- The new process is predictable.
- The new process is risk-informed.

The group generally saw challenges in the following:

- The use of no-color findings.
- The inclusion of comments in reports when no findings were identified.
- The handling of extended shutdowns under MC 0305 versus MC 0350.
- The length of time in the action matrix for inspection findings may be excessive.
- There may be the potential for licensees to try to get the thresholds changed regarding the green/white threshold to avoid white PIs and inspection findings.
- There seems to be a strong aversion to green by some licensees.
- There is an external stakeholders perception that negotiation occurs between the NRC and utilities in determining the results of the SDP for an issue.

**Enclosure 8 - Status of the Reactor Oversight Process
(Slides used by William Dean)**