

June 13, 2001

MEMORANDUM TO: William D. Beckner, Acting Chief
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

FROM: David T. Diec, Reactor Engineer/**RA**/
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: NOTICE OF PUBLIC MEETING WITH NUCLEAR ENERGY INSTITUTE
(NEI) REPRESENTATIVES TO DISCUSS RESOLUTION OF THE
STAFF'S COMMENTS ON NEI 00-04, Rev A2, *OPTION 2
IMPLEMENTATION GUIDELINE*, AND STATUS OF PILOT ACTIVITIES

DATE & TIME: June 27, 2001
9:00 a.m - 12:00 p.m.

LOCATION: U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852
Room T-10A1

PURPOSE: Discussions between NEI and NRC concerning resolution of the staff's
comments on NEI 00-04 Rev A2, *OPTION 2 IMPLEMENTATION
GUIDELINE* and the status of pilot activities. Note: RIP-50 Option 2 Pilot
Program is included as background information for discussion of the
status of pilot activities.

PARTICIPANTS: NRC NEI
T. Reed T. Pietrangelo
E. Mckenna, et al. A. Heymer , et al.

Meetings between NRC technical staff and applicants or licensees are open for interested members of the public, petitioners, interveners, or other parties to attend as observers pursuant to "Commission Policy Statement on Staff Meetings Open to the Public: Final Policy Statement," 65 Federal Register 56964, 9/20/2000. Members of the public who wish to attend should contact David Diec at (301) 415-2834 or DTD@nrc.gov

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Accession#ML011650040 NRC-001

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PURPOSE OF RIP-50 OPTION 2 PILOT PROGRAM

To acquire information that enable the staff to develop a rule, statements of consideration, regulatory analysis, and a regulatory guide to support the RIP-50 Option 2 effort.

PURPOSE OF THIS OUTLINE

To document the staff plans, expectations, and views with respect to the following areas related to the Pilot Program Effort:

- Why the Pilot Plant effort is needed and its overall objectives
- What the Option 2 Pilot Plant effort will be piloting (scope and breadth of pilots)
- How the Option 2 Pilot Plant effort will be conducted (including staff interaction)
- The measures that the staff will be using to assess progress/success of the Pilot Plant effort
- The staff members responsible for individual pieces of the Pilot Plant effort
- Which plants will participate in the Pilot Plant effort
- The schedule for the Pilot Plant effort
- How the results of the Pilot Plant effort will be documented by pilot plant licensees, owners' groups, NEI, and the NRC
- The regulatory mechanism for implementing the pilots (e.g., exemptions)

WHAT WILL THE OPTION 2 PILOT PLANT EFFORT PILOT?

- NEI 00-04 and supporting documents (e.g., NEI 00-02)
 - Categorization
 - Treatment
 - Feedback/Update Mechanism
 - Change Control
- Variety of SSC Types
- Variety of Rules
- Variety of Plant Designs (old, new, BWRs, Westinghouse, CE, B&W)

WHY IS THE OPTION 2 PILOT PLANT EFFORT NEEDED?

- To determine if NEI 00-04 can be endorsed as a method for implementing 50.69
 - Exercise NEI 00-04 in order to assess it with respect to the following areas:
 - Maintaining Safety
 - Adequacy
 - Completeness
 - Predictability
 - Dependency on and interface with other methods -- e.g., NEI 00-02
 - Unnecessary Burden
 - Cost/Benefit
 - Practicality
 - Improving Internal Efficiency and Effectiveness
 - Completeness
 - Clarity
 - Practicality
 - Increasing Public Confidence
 - Availability (documentation)
 - Clarity (content)
 - Predictability (results)
 - Repeatability (process across plants not necessarily results across plants)
 - Identify enhancements (additions, deletions, clarifications) needed for NEI 00-04
 - Identify areas where exceptions may need to be taken

- To Develop staff positions with respect to material needed to draft 50.69 and a regulatory guide, a statements of consideration, and a regulatory analysis to support 50.69

HOW WILL THE OPTION 2 PILOT PLANT EFFORT BE CONDUCTED?

- Early interaction with NEI and Owners' Groups
 - Review of NEI 00-04 for use in the Pilot Plant effort
 - Develop a process for interaction between staff and industry participants

- Early Interaction with Pilot Plant Participants to
 - Understand the extent to which the Pilot Plants will be consistent with NEI-00-04
 - Understand the plant specific processes that will be used for the Pilot activities (Potential visits to observe/review plant specific processes)
 - Understand how “far” we’ll take the pilots

- Official Notification/Submittal to Staff (Exemption Request)
 - Plants would submit exemption request or other form of application to participate
 - Plants would accept condition to update process as a result of knowledge gained from the pilot effort
 - Staff/Plant would agree on scope of SSCs included in exemption request
 - Staff/Plant would agree on scope of rules included in exemption request
 - Staff review of application would be based on above and on reasonable agreement with NEI on NEI 00-04

HOW WILL THE OPTION 2 PILOT PLANT EFFORT BE CONDUCTED? (Continued)

- Periodic reporting to staff
 - Pilot Plants would report results of categorization process to staff
 - Pilot Plants would report potential and real problem areas (categorization and treatment) to staff
 - Pilot Plants would report status and major upcoming events to staff to allow staff to make a determination as to whether the staff needs to observe or audit upcoming events

- Periodic visits (staff to pilot plant participants) to observe process
 - Peer review
 - IDP
 - Review documentation of information presented to the IDP
 - Review documentation of decisions made by IDP
 - Tabletop exercises

- Feedback of NRC observations to stakeholders
 - Staff would issue trip/observation reports and/or conduct public meetings related to plant visits and related to material reviewed

- Identify areas where hypothetical cases need to be run (these are areas where real situations may not arise during pilot plant effort)
 - Treatment
 - Feedback/Update Mechanism
 - Change Control

HOW WILL THE OPTION 2 PILOT PLANT EFFORT BE CONDUCTED? (Continued)

- Develop hypothetical cases for portions of NEI 00-04 that would not otherwise be tested
- Run hypothetical cases through the process above
- NEI will modify NEI 00-04 as a result of knowledge gained from the above process
- Staff will identify areas that need to be enhanced but that were not incorporated into NEI 00-04 (i.e., areas where exceptions need to be identified in the endorsing regulatory guide)

WHAT ARE THE MEASURES FOR ASSESSING PROGRESS/SUCCESS?

- Find industry document endorsable for implementation of 50.69 or identify the exceptions that need to be included in the endorsing regulatory guide. Agreement will be based on extent of:
 - Adequacy
 - Completeness
 - Cost/Benefit
 - Availability of documentation (public)
 - Clarity (content)
 - Predictability (results)
 - Repeatability (process across plants not necessarily results across plants)
 - Practicality
 - Clarity of the interface with other methods that NEI 00-04 depends on -- e.g., NEI 00-02, FIVE methodology, Seismic Margins Analyses, Shutdown, etc.

- Find implementation of NEI 00-04 consistent with applicable staff expectations as provided in the South Texas Exemption Request FSAR Section 13.7.4 or, as necessary, RILP approved alternatives to those expectations

- Identify the appropriate change control process

- Identify appropriate monitoring for SSCs in the different risk-informed safety classes (RISC)

- Address findings from the Pilot Program effort by updating NEI 00-04 prior to end of pilot plant effort so that changes can be piloted, if practicable

WHAT ARE THE MEASURES FOR ASSESSING PROGRESS/SUCCESS? (Continued)

- Find NEI 00-04 acceptable for all SSC types or identify outliers and adjust 50.69 accordingly
- Find NEI 00-04 acceptable for all Option 2 rules or identify outliers and adjust 50.69 accordingly
- Find NEI 00-04 generically acceptable
- Find that sufficient and appropriate information is provided to the IDP for deliberation
- Find that IDP deliberations are adequately documented through means such as meeting minutes
- Find that categorization and treatment is being piloted for the full range of risk and deterministic classifications
- Find borderline SSCs properly categorized with consideration of an appropriate level of supporting information and with sufficient documentation