

November 21, 2001

MEMORANDUM TO: Cynthia Carpenter, Branch Chief
Risk Informed Initiatives, Environmental, Decommissioning,
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

FROM: Joseph L. Birmingham, Project Manager/**RA**/
Risk Informed Initiatives, Environmental, Decommissioning,
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF OCTOBER 3, 2001, MEETING WITH NUCLEAR
ENERGY INSTITUTE (NEI) ON RISK-INFORMED IN-SERVICE
INSPECTION (RI-ISI)

On October 3, 2001, Nuclear Regulatory Commission (NRC) staff met with representatives of NEI and industry at NRC headquarters in Rockville, Maryland. The purpose of the meeting was to discuss licensing strategies and schedule for RI-ISI, RI-ISI program update, communication of changes to program, and plans for future meetings. Attachment 1 lists meeting attendees, Attachment 2 is the slides presented by NEI (ADAMS accession # ML012830374).

After introductions, Biff Bradley, of NEI, began the meeting by briefly discussing the history of risk-informing ISI requirements and the success that RI-ISI has had. Mr. Bradley reviewed the agenda items for the meeting to which NRC staff stated that there were certain items that they would like to have discussed in the meeting. After a brief discussion, Mr. Bradley indicated that most of those items were in the presentation. The staff and NEI then discussed the following items (see Attachment 2 for additional details).

- High Energy Line Break/ Break Exclusion Requirements (HELB/BER)- Generic Issues
- Relationship of BER Examination Requirements to a RI-ISI Application
- Inspection Sample Methods 1) Electrical Power Research Institute (EPRI) Topical and 2) Westinghouse Owners Group (WOG) Topical
- RI-ISI Living Program Philosophy
- Schedule for Submittal Approvals

The NRC staff and NEI discussed several issues in more depth. These included licensees using 10 CFR 50.59 to adopt the methods described in the WOG and EPRI topicals, the need to show that Generic Design Criteria (GDC) 4 continues to be met, the effect on commitments to Section XI of the American Society of Mechanical Engineers (ASME) Code, and when to provide NRC notification of changes or to seek approval of changes to site programs in the future.

Regarding using 50.59 criteria to adopt RI-ISI methods, provided an acceptable justification is documented, the group agreed that using 50.59 to adopt the applicable WOG or EPRI

methodology would be appropriate once these topical reports were approved. NRC staff had a concern that licensee implementation may deviate significantly from the topical reports. However, NRC review of the demonstration plant submittals (included in the EPRI addendum and to be provided by the WOG) will provide the staff with insights on the implementation of the methodologies. Accordingly, the staff expects to prepare detailed safety evaluations to define the limitations of the methodologies being approved. Applications that do not conform to the approved methodologies will have to be submitted to the NRC for review and approval.

Ted Sullivan, of the NRC, initiated a discussion of how the licensees continue to meet GDC 4. The group agreed that it would be appropriate to include a discussion of this in the submittals. The NRC staff may issue Requests for Additional Information (RAIs) if needed to make this assessment.

The NEI explained that licensees would have to continue to meet commitments to ASME Section XI unless they specifically initiated relief requests. Inspections required by ASME Section XI are unaffected by implementing RI-ISI for required augmented inspections.

The NEI and staff discussed various scenarios in which changes to a licensee inspection program would require NRC approval and those in which it would not. The NEI agreed to explore this further with the staff including potentially drafting for staff review a description of those scenarios for which NRC approval is required and those for which it would not be.

The staff and NEI discussed the schedules for approvals of the EPRI and WOG topicals. The staff felt that approval of the EPRI topical was possible about April 2002 with approval of the WOG topical to follow about June of 2002.

The staff and NEI discussed the need for future meetings and determined that additional meetings on the generic implementation of RI-ISI were probably not needed. Additional meetings for the EPRI and WOG topicals would be scheduled as needed.

Having completed the discussion the meeting was adjourned.

Project No. 689

Attachments: As stated

cc w/atts: See list

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Project No. 689
Attachments: As stated
cc w/atts: See list

Distribution: Mtg. Summary w/ NEI on RI-ISI Oct 3, 2001
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OGC

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NRC-001

* See previous concurrence

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OFFICE	RGEB	SC:EMEB	SC:EMCB	EMCB	SC:RGEB
NAME	JBirmingham	KManoly	ESullivan*	TChan	Swest
DATE	10/25/01	11/14/01	11/09/01	11/19/01	11/21/01

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Project No. 689

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List of Attendees For RI ISI Meeting Oct 3, 2001

NAME	ORGANIZATION
Biff Bradley	Nuclear Energy Institute
Dennis Weakland	FENOC/WOG
Patrick O'Regan	EPRI
Cheryl L. Boggess	Westinghouse/WOG
Paul Stevenson	Westinghouse/WOG
Mark Pyne	Duke Power
Alex McNeill	Dominion
EiLynn McClain	Niagara Mohawk
Robin Graybeal	Proto-Power Corp.
Deann Raleigh	LIS, Scientech
Chuck Wirtz	First Energy Nuclear
Benjamin Montgomery	Ameren-UE Callaway
Ted Sullivan	NRR/DE/EMCB
Syed Ali	NRR/DE/EMCB
Kamal Manoly	NRR/DE/EMEB
Yueh-Li C. Renee	NRR/DE/EMEB
Stephen Dinsmore	NRR/DSSA/SPSB
Joseph Birmingham	NRR/DRIP/RGEB
Eileen McKenna	NRR/DRIP/RGEB