

May 19, 2003

MEMORANDUM TO: Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Drew G. Holland, Project Manager, Section 2 **/RA/**
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 15, 2003, MEETING WITH THE
WESTINGHOUSE OWNERS GROUP AND NRC SENIOR
MANAGEMENT

On April 15, 2003, the NRC staff met with representatives of the Westinghouse Owners Group (WOG) at their request. This was an open, Category 2 public meeting. The subject of the meeting was to discuss a variety of issues of interest to both WOG and NRC senior management staffs. Mr. Samuel Collins, Director of the Office of Nuclear Reactor Regulation, provided opening remarks concerning the control of hydrogen in containment, containment sump issues, and the steam generator technical specification work with the Nuclear Energy Institute (NEI). Mr. Collins mentioned that the risk oversight process is proving to be a valuable tool. He commented on needing feedback as to whether or not the end-of-cycle meetings are proving to be of value. Mr. Collins briefly discussed the emergent work involving alloys 600 and 690 and the Davis-Besse lessons learned.

Mr. Muench explained that he had recently been elected as the executive chairman of the WOG/CEOG Owners Group-now simply the WOG. He also said that Mr. Overbeck had been elected as the executive vice chairman. Mr. Muench commented that he looked forward to his new role and that he was pleased to see such good representation from the Combustion Engineering plants.

Mr. Bob Bryan, the WOG chairman, began the detailed presentation showing what the WOG believed were accurate statistics on the review and approval cycle durations and time lines of receiving the final safety evaluation reports on particular topical reports. He indicated that significant improvements are warranted. Mr. Herbert Berkow, NRC agreed that the NRC has room for improvement in the area of project metrics but that his review of the same data portrays the program in a better light than the WOG data did. NRC senior managers asserted that the agency will focus appropriate attention to topical reports and individual licensing actions and activities. However, the industry must realize that agency resources are limited and that they will have to show us where to establish priorities. The NRC and the WOG executives had a number of suggestions. Those suggestions that will be pursued are listed as action items at the end of this summary.

The next item for discussion was the containment sump, generic pressurized water reactor (PWR) issue. The WOG stated that the objective is to develop guidance for the PWR industry to address Generic Safety Issue 191, "PWR Recirculation Sump Performance." It was explained that debris generation and transport guidelines are under final review and that an NEI letter identifying future actions has been drafted. An Evaluation Guidelines Workshop is scheduled for late July of this year. Industry guidance is expected to be available by the end of September 2003. The WOG specifically requested that the NRC give consideration to limited break sizing criteria (and consequently the degree of debris generation), to consider risk-informed methods and to consider an alternate break size for debris generation only. A white paper had been submitted for staff review on April 11, 2003. Lastly, the WOG requested us to participate in a meeting at the end of April 2003, to discuss these issues in more detail.

The WOG made a presentation on risk-informed inservice inspection (RI-ISI). The WOG is concerned about the content and number of requests for additional information (RAI) in this area by the NRC. They contend that the purpose of WCAP-14572 was to avoid repeat reviews on topic items. They claim that various licensees continue to receive RAIs related to the generic methodology. The WOG is concerned about their ability to implement generic beneficial ISI and limit inspection personnel radiation dosages. They believe that this causes unreasonable uncertainty in the regulatory process. In addition, the staff's ability to raise new issues at the 10-year updates is of concern to the WOG. The staff responder explained the circumstances leading to the RAIs that were mentioned. Apparent misapplications of methodology have occurred as determined by NRC audits. In addition, expert panel decisions by certain licensees have not been made with a clear qualitative basis. The staff has agreed to participate in a meeting requested by the WOG for May 14, 2003, to help resolve the issues.

The next discussion item was the Technical Specification Task Force (TSTF) review fees. The WOG explained their view that the recent change is inconsistent with the Final Policy Statement for technical specification improvement and that the change discourages use of the Standard Technical Specifications. There were additional WOG contentions regarding the January 10, 2003, letter to NEI on this subject. The staff present explained that the NRC's rationale was fully explained in the January 10th letter which was concurred in by the NRC's Chief Financial Officer. The WOG (and other owners groups) can continue to submit TSTFs and request fee-waivers where they believe it is justified. In addition, fee waivers can be requested for TSTFs that the staff has stopped work on, or they can choose to invest their resources commensurate with the value of the work item to their membership. In this regard, Mr. Collins committed that the staff would reconsider fees for TSTFs submitted before the January 10, 2003, letter to NEI.

At this point, Mr. Sheron of the NRC staff commented on the need to work diligently to achieve closure of the Catawba steam generator license amendment change submittal. Catawba has submitted a technical specification change package as the pilot plant for a new steam generator (SG) regulatory framework. Work on changing the SG regulatory framework (via the technical specifications) has continued on much longer than the staff and industry had anticipated. Mr. Collins stated that the staff should consider a website for frequently asked questions that arise in the review of the Catawba submittal.

Mr. Sheron stated that it would be important for those owners replacing reactor vessel heads that an inspection program for the new heads needs to be established. The industry needs to anticipate problems (particularly with regard to inspection) and work these problems out with the staff in advance. A fully endorsed Materials Reliability Program (MRP) for reactor vessel head inservice inspection is sought by the staff. In addition, a 10 CFR 50.55(a) Code Case should be developed.

Mr. Collins considered the items listed below to be action items from the meeting. These items do not include those already provided in the body of this summary:

1. Whenever a WOG project reaches completion of the NRC review, the performance of that project in terms of actual schedule and manhours expended will be compared to those resources committed at the project outset. This data will then be evaluated for the WOG and the NRC to better understand the positive and negative factors in the project's performance. (NRC/WOG)
2. The NRC project manager will maintain frequent contact with the WOG and the NRC technical reviewers on each project in order to focus review resources where needed. Formal monthly phone calls between the WOG and the NRC project manager will be conducted to safeguard the priorities of the entire WOG topical report review program at the NRC. (NRC/WOG)
3. Perform root cause analyses in the near term to determine project delays. (NRC/WOG)
4. Define the level of generic benefit (i.e., multi-plant) at the outset of a review to establish prioritization. (WOG)
5. NRC will actively participate in the upcoming April 29, 2003, meeting on containment sump performance.
6. NRC will actively participate in the May 14, 2003 meeting to discuss issues related to RI-ISI.
7. Establish an NRC leadership team agenda item to consider ways to establish due dates between the NRC and WOG. (NRC)
8. Develop a small working group to field frequently asked questions on steam generator inspections. (NRC)
9. Duke agrees to provide responses to the steam generator inspection performance requests for additional information within 4-6 weeks of receipt.

S. Dembek

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At this point the meeting was concluded with comments from both groups that the meeting was successful. No regulatory decisions were made.

Project No. 694

Attachment: Meeting Attendees

cc w/encl: See next page

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Attachment: Meeting Attendees

cc w/encl: See next page

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Westinghouse Owners Group

Project No. 694

cc:

Mr. H. A. Sepp, Manager
Regulatory and Licensing Engineering
Westinghouse Electric Corporation
P.O. Box 355
Pittsburgh, PA 15230-0355

Mr. Gordon Bischoff, Project Manager
Westinghouse Owners Group
Westinghouse Electric Corporation
Mail Stop ECE 5-16
P.O. Box 355
Pittsburgh, PA 15230-0355

Mr. Ian C. Rickard, Project Manager
Windsor Nuclear Licensing
Westinghouse Electric Company
Mail Stop 6009-0420
Windsor, CT 06095-0500

Mr. Charles B. Brinkman, Director
Washington Operations
Westinghouse Electric Company
12300 Twinbrook Parkway, Suite 330
Rockville, MD 20852

**SENIOR MANAGEMENT MEETING WITH WESTINGHOUSE AND
COMBUSTION ENGINEERING OWNERS GROUPS
MEETING ATTENDEES
APRIL 15, 2003**

WESTINGHOUSE OWNERS GROUP (WOG)

R. Muench (WCNOC)
M. Dingler (WCNOC)
D. Shafer (AmerenUE)
F. Madden (TXU Energy)
T. Cleary (Progress Energy)
R. Kundalkar (FPL)
S. Seace (Dominion)
R. Mecredy (RG&E)
R. Phelps (OPPD)
T. Schiffley (Exelon)
B. Bryan (TVA)
D. Bajumpaa (DNC)
D. Cooper (NMC)
M. Nazar (NMC)
H. Barron (Duke)
D. Pace (Entergy)
T. Tynan (SNC)
D. Lounsbury (PSEG)
G. Overbeck (APS)
D. Weakland (First Energy)
J. Geissner (A&P)

NRC

S. Collins
B. Sheron
S. Dinsmore
J. Lehning
D. Matthews
R. Dennig
L. Lund
R. Barrett
H. Berkow
D. Holland
M. Rubin

WESTINGHOUSE ELECTRIC COMPANY

P. Richardson
G. Bischoff
C. Brinkman
N. Liparulo
J. McNerney
S. Dederer
R. Etling

OTHER

G. Twachtman (McGraw-Hill)
J. Butler (NEI)
A. Marion (NEI)