

April 6, 2004

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 MARCH 9, 2004, MEETING WITH THE
WESTINGHOUSE OWNERS GROUP EXECUTIVES AND
NRC SENIOR MANAGEMENT

On March 9, 2004, the NRC staff met with representatives of the Westinghouse Owners Group (WOG) at their request. This was a public meeting. A list of the attendees is attached. The slides used during the meeting are available under Accession No. ML040860181.

The subject of the meeting was to discuss a variety of issues of interest to both the WOG and NRC senior management. Mr. Richard Muench provided opening remarks for the WOG. Mr. James Dyer, Director of the Office of Nuclear Reactor Regulation, provided opening remarks concerning the present challenges to the NRC staff, particularly in the areas of license renewal and power uprates. Mr. Ted Schiffler then began the detailed presentation for the WOG with an overview of the growing WOG membership which now includes 26 members in the United States and 9 members abroad. To bring this element more into perspective, it was explained that the WOG represents 34 utilities, with 153 operating reactors in 10 countries. One-third of all the world's operating reactors are members of the WOG. A significant message brought out in the meeting is that this organization has unparalleled opportunities to share best practices on a global scale. The WOG officers were then identified. The WOG mission was described as supporting safe and reliable plant operations, to effectively leverage the resources of its members, to provide a forum for joint discussion and resolution of common issues and to share best practices and lessons-learned among its U.S. and international members.

The presentation then moved on to a discussion of the WOG strategic issues. It was explained that the WOG wants to increase its role in implementation of plant level solutions to materials degradation issues. Organizational leadership in this area is provided by EPRI, whose strength is in the research of materials degradation and with the WOG whose strength is in the implementation of solutions and coordination of utility responses. The present status was described as WOG responding to the Materials Technical Advisory Group (MTAG)/Materials Executive Oversight Group (MEOG) requests, participating in the Nuclear Energy Institutes (NEI) Materials Survey, participating in industry meetings and having ratified a charter amendment that will allow utility executives to issue binding commitments with a seventy-five percent vote. This can be illustrated by the recent pressurizer heater sleeve issue response.

The next area to be discussed was large break loss-of-coolant accident (LBLOCA) redefinition. The WOG's objective in this area is to redefine LBLOCA pipe size in all NRC regulations to reduce costs and increase safety and operating flexibility. It was explained that LBLOCA using the double guillotine break of the largest of the reactor coolant system piping impact all aspects of plant design and operation. The WOG claimed that technologies have evolved to explicitly demonstrate piping integrity and illustrate that the current LBLOCA break size is unrealistic. At this point, Mr. Dyer expressed that 10 CFR 50.46 is pervasive throughout the regulatory infrastructure and that we need to make sure that we take account of all the different areas affected as we proceed with this proposed change. The discussion progressed and the WOG explained that they have had difficulty in finding a volunteer pilot plant. The original plan for this effort would have been too costly for the affected utility. Uncertainty about the acceptability of the project to the NRC makes the investment risky. As a result of these factors, the WOG has restructured the LBLOCA pilot plant project to address these and other concerns. The WOG went on to explain that the restructured project focuses only on eliminating the LBLOCA accident analysis from the Final Safety Analysis Report. With this in mind, it was pointed out that maximum break size would be defined based on break likelihood and by plant-specific probabilistic risk analysis. As explained, there would be no reduction in plant capability with this phase. Future changes to technical specification requirements would necessitate separate license amendments. The mitigation capability would be maintained consistent with the requirements of the Maintenance Rule and Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant Specific Changes to the Licensing Basis" and expectations of the severe accident management program. The discussion then focused on the current regulatory environment. It was explained that probabilistic risk assessment (PRA) scope and quality need to be appropriate for the application and that the staff requirements memorandum (SRM) of December 2003, on PRA quality issues needs to be adhered to. Some of the main issues in the SRM include the reversibility of plant changes, reductions in emergency core cooling system (ECCS) and containment capabilities and analysis methodologies for remaining design basis loss of coolant accidents (LOCAs). It is expected that adherence to the elements will minimize the impact on NRC and WOG resources. In conclusion on this topic, the WOG believes that LBLOCA redefinition is important to risk-informing the regulations. The WOG encourages the NRC to complete the LBLOCA expert elicitation effort and encourages the NRC to clarify the March 2003 SRM on risk-informed changes to the technical requirements of 10 CFR Part 50 (Option 3).

The next matter to be discussed was PRA scope and quality. The WOG fully supports all members in achieving full scope, all mode, high quality PRAs for complete implementation of risk-informed plant operations (design, licensing, enforcement, maintenance, etc.) It was explained that risk-informed decisionmaking has been a goal of the industry since 1997. PRAs and risk-informed decisionmaking are increasing in scope and application. The NRC Commission Policy Statement of December 2003 outlines an approach for resolving PRA attribute issues that is consistent with WOG direction. The WOG explained that they are addressing PRA scope and quality. Some of the areas involved include a PRA quality roadmap for Option 3, LBLOCA, resolution of PRA uncertainties in loss of offsite power (LOOP)/LOCA, and pilot applications for Option 2 covering scope, quality, component categorization process and results. Another area of consideration is the WOG risk-informed strategic plan including a matrix of PRA attributes, applications, benefits, and costs. Standard PRA modeling guidance was then discussed. In conclusion, the WOG is in agreement with the PRA approach outlined in the December SRM and recent Advisory Committee on Reactor Safeguards/NRC meeting.

The WOG efforts will demonstrate PRA scope and quality considerations under Option 2. The WOG will be submitting two plant applications under this category in 2004. The plants involved will be Surry and Wolf Creek. The WOG requested that the NRC commit the resources to support these two applications.

The WOG topical report (TR) program was the next topic for discussion. A number of problems were raised. Solutions to the problems will enhance the program. First, the WOG and the NRC must assure that all technical review branches for a TR are identified early in the process of reviewing the report. This has not always been done in the past and has resulted in unnecessary delays. Second, efforts need to be made to avoid switching reviewers on a TR once the review has begun. Third, limited NRC resources are delaying the review of several important TRs. Fourth, the fee waiver consideration process needs to be streamlined to prevent project delays in starting. Fifth, each TR should have a pre-submittal meeting with the staff.

Appreciation was expressed by the WOG to the NRC for its commitment to support the monthly status calls. The WOG expressed that we need to help each other in reducing the amount of time required for each milestone in the review process to be completed. It was also shown that a large percentage of TRs have technical specification task force items associated with them.

In conclusion of the meeting, the WOG will continue to measure and track performance based on the overall length of reviews and time required to achieve project milestones. Continued support by the NRC for the conference calls was requested. It is planned that the WOG and the NRC will meet three times per year to provide feedback and to check TR review status.

Drew Holland, the NRC WOG project manager, explained that all of the previous year's action items had been discussed during the course of this meeting. He then went on to describe the action items noted for this meeting which included:

1. There will be a meeting in the near term for the WOG to discuss Generic Safety Issue 191, "Assessment of Debris Accumulation on PWR Sump Performance," with the staff. It is critical for WOG to participate in that meeting since NRC actions will be dependent on the results of that meeting. It is also planned to discuss 10 CFR 50.46 potential changes at the meeting.
2. The NRC will do everything possible to identify all potential TR review branches prior to the start of a review.
3. Herb Berkow offered to be of assistance to the WOG in the future in the event that the staff rejects having a particular meeting that the WOG requests.
4. As much advance notice as possible will be provided to the WOG on significant delays to TR reviews.
5. The WOG may be asked to provide information to the staff as to what elements of electrical power grid operation will be monitored by licensees. It is uncertain at this time as to what agency effort/document this will be covered in.

6. The WOG will respond to the staff letter regarding the permanent use of mechanical nozzle seal assemblies (MNSAs). Inservice inspection for the MNSAs may be difficult, but is required for permanent use of MNSAs.
7. The NRC will consider what requirements will be for MNSAs that have been preemptively installed.

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:

Mr. James A. Gresham, Manager
Regulatory Compliance and Plant Licensing
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

Mr. Gordon Bischoff, Manager
Owners Group Program Management Office
Westinghouse Electric Company
P.O. Box 355
Pittsburgh, PA 15230-0355

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**SENIOR MANAGEMENT MEETING
WITH THE WESTINGHOUSE OWNERS GROUP
MEETING ATTENDEES
March 9, 2004**

WESTINGHOUSE OWNERS GROUP (WOG)

R. Muench (WCNOC)
M. Dinger (WCNOC)
R. Lopriore (Exelon)
F. Madden (TXU Energy)
K. Young (Ameren UE)
R. Kundalkar (FPL)
D. Pace (Entergy)
G. Overbeck (APS)
R. Phelps (OPPD)
T. Schiffley (Exelon)
G. Gerzen (Exelon)
D. Bajumpaa (DNC)
A. Hackerott (OPPD)
M. Flaherty (RG&E-Ginna)
R. Hardies (Constellation Energy Group)
T. J. Jordan (STP Nuclear Operating Company)
Lyle Bohn (NMC)
A. E. Scherer (SCE)

WESTINGHOUSE ELECTRIC COMPANY

S. Dederer
G. Bischoff
C. Brinkman
N. Liparulo
S. Dederer
R. Etling
K. Vavrek

OTHER

M. Schoppman (NEI)
J. Butler (NEI)

NRC

J. Dyer
B. Sheron
S. Rosenberg
D. Holland
E. McKenna
K. Manoly
W. Bateman
M. Johnson
H. Berkow