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NRC/LATF Interactions on Potential Generic Issues

NRC/NEI Meeting on MSIV Operability
October 12, 2006

NEI
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Current Situation

- NEI member companies frequently ask the LATF and TSTF to help resolve plant-specific issues
 - LATF and TSTF enter at midstream
 - NRC positions are semi-fixed & resist change
- Issues often prove to be generic
 - A change in interpretation where the licensing principles involved affect multiple plants

Examples - Sources of Potential Generic Issues

- NRC inspection findings
- NRC new generic communication
- NRC identification of cross-cutting issues
- NRC review of license amendment requests

Improvement Opportunity

- Better screening of emerging issues for generic applicability
- Facilitate early communications with stakeholders
 - Public meeting, workshops, NRC website, Federal Register
- Maximize information and data available to NRC and stakeholders during issue resolution

Ultimate Goal

- Maintain proper focus on nuclear safety
- To identify the correct specific and generic resolution
- Identify the most efficient and effective approach for NRC and stakeholders

Approach

- NRC and stakeholders define the issue and agree on a written problem statement
 - Must establish the safety significance
- Agree on schedule
- Define and document key terms

Approach (continued)

- Gather relevant information, determine precedents, and define scope
 - May result in revision to problem statement and schedule
- Propose and document the solution
- Solicit stakeholder feedback
- Establish the regulatory position

Next Steps

- Start a NRC/stakeholder dialogue on the generic issue resolution process
 - Licensing Forum 2006
 - Quarterly LATF meetings
- Establish protocols for constructive exchange of experience and ideas
- Joint NRC/NEI Workshop
- Identify what NRC and stakeholders can do to obtain:
“1 Issue – 1 Review – 1 Resolution”

Example Issues

- Setpoints
- Groundwater
- Security
- Safety Culture
- TS Operability issues
- RCPB leakage
- RCS leakage instrumentation
- Digital I&C
- Fire protection
- ECCS entrained gas
- CDBI follow-up items

MSIV Actuation Train Issue

- Issue raised in December 2004 at Callaway
- Applied to other Region IV plants
- May also be applicable to other plants and other specifications
- Discussed at the August 17 TSTF/NRC meeting
- NEI LATF informed that NRC preparing TIA with NRC position prior to action by the TSTF MSIV Working Group

MSIV Actuation Train Issue

- Very low safety significance
- There are generic aspects of this issue:
 - MSIV Operability requirements
 - Implication of Surveillance Requirements
 - Potentially applicable to other Specifications
- Could be perceived as a change in Staff position
- Valid issue for stakeholder input

Industry Actions

- Significant Effort to Address Issue
 - TSTF created a MSIV Working Group to address generic technical aspects of the issue
 - TSTF MSIV Working Group paper to be submitted to the NRC by October 31
 - Letter will request public meeting with the NRC and stakeholders to discuss
 - May result in submittal of a Traveler to clarify or modify the Tech Specs

Industry Request

- NRC issue draft TIA for stakeholder review and comment
- NRC conduct public meeting/workshop on issue
- Request is consistent with the NRC's Principles of Good Regulation



Industry Request

NRC response to industry request?