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From:

Tilda Liu

TACs:

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To:

FAST

*** YELLOW ***

For Signature of:

Routing:

Dyer
Wiggins
Mitchell
Boger
Grobe
NRR Mailroom

Description:

Provide Details on How Closure of GSI 191 will be Accomplished and Documented.

Assigned To:

DSS

Contact:

RULAND, WILLIAM H

Special Instructions:

Called DSS (Sarah) on 10/18 at 10:33 a.m. for pick up



**2007 Meeting
Amelia Island**

August 8, 2007

NRUG Meeting Amelia Island, Florida

On August 8, 2007 NRC and nuclear industry representatives attended the annual National/Regional Utility Group meeting to discuss issues that are of mutual interest. The meeting was called to order at 1300 by Laurie Lahti, NRUG chair.

Attendance:

NRC

James Andersen	NRR
Jim Caldwell	Region III
Jim Dyer	NRR
Mike Case	NRR
Roy Caniano	Region IV
Samuel Collins	Region I
Victor McCree	Region II

INDUSTRY

Randall Crane	American Electric Power
Steve Petzel	American Electric Power
Mike Cooper	Certrec Corporation
Ted Enos	Certrec Corporation
Ron Gaston	Detroit Edison Company
Tom Cleary	Dominon Nuclear Connecticut (Dominion)
Greg Cullen	Energy Northwest
Bryan Ford	Entergy
Dub Barfield	Entergy
Jerry Roberts	Entergy
Laurie Lahti	Entergy
Mark Giles	Entergy
Pamela Cowan	Exelon
Jim Peschel	Florida Power and Light
Pete Wells	Florida Power and Light
Tim Hope	Luminant Power
Paul Fleming	Nebraska Public Power District
John C. Butler	Nuclear Energy Institute
Mike Shoppman	Nuclear Energy Institute
Leonard Sueper	Nuclear Management Company
Gary Cavanaugh	Omaha Public Power District
Joe McManis	Omaha Public Power District
Larry Parker	Pacific Gas and Electric Company

Steven Mannon	PSEG Nuclear
Rob Sweet	Scientech
Ben George	Southern Nuclear Operating Company
Dave Midlik	Southern Nuclear Operating Company
Jack Stringfellow	Southern Nuclear Operating Company
Duane Kanitz	STARS Regulatory Affairs
Tod Moser	STARS Regulatory Affairs
Wayne Harrison	STPNOC
Fred Mashburn	Tennessee Valley Authority

Agenda items that were discussed are as follows:

1. Safety culture and substantive cross-cutting issues:

- The NRC conducted workshops with the Regional Utility Groups. These meetings provided helpful information related to the process and exit criteria.

2. Expectations for closing issues related to 95001 and 95002 supplemental inspections:

- Communication on this issue has been successful. No further action is necessary.

3. Task Interface Agreements:

- This issue will be discussed later in the meeting

4. IMC 0612 performance deficiency definition:

- The interface between NRC and the ROP task force on this issue was effective. IMC 0612 was revised to clarify the definition.

5. Watchstander credit for on shift SROs:

- Industry still has some questions related to how the requirements are implemented.
- NRC stated that the issue was related to inconsistency between regions. This was addressed through the Operator Licensing Forum. The results were provided to Operator Licensing training and should be publicly available.
- Rob Sweet will obtain the information and provide it to the NRUG members.

6. Inspection hour documentation:

- The process for documenting inspection hours was briefly discussed. No additional information is required on this subject.

7. ASME Code Class 2/3 leakage operability assessments:

- System operability related to leakage from Class 2 and 3 systems should be evaluated using established operability guidelines.
- Performing an assessment within 72 hours is not an NRC requirement. However, the safety significance of the leakage and wall thinning should determine the priority for corrective action.

8. ROP Surveys

- Public ROP surveys are planned to be performed on a biennial basis. A survey internal to the NRC will be conducted on the years following the external survey.
- Responding to both internal and external individual comments annually is resource intensive.
- The frequency may be changed if significant ROP changes are implemented.
- An external survey is planned for October, 2007.
- Internal NRC comments on the safety culture effort will be received at both the regional and national levels.

9. Safety culture initiatives

- Communication through the ROP task force has been successful.
- Efforts in this area are ongoing and legislation has not been necessary.
- The first 95003 inspection is being performed at Palo Verde and will provide important lessons learned.
- Incremental changes to the safety culture initiatives will be considered based on the first 18 months of implementation.
- The NRC has established a task force to evaluate implementation and consistency between regions.
 - Comments on the process may be submitted to the RUG chairs or directly to Roy Caniano.
 - Rug chairs were encouraged to send feedback to Roy. Although the NRC assessment will continue through 2007, comments would be appreciated by the end of September.
 - Sam Collins commented that information related to safety culture was communicated to the licensees through various processes other than the ROP including feedback on the number of allegations, chilling effect letters and licensee internal employee concern programs. The need to provide an integrated message was discussed.
 - The NRC encouraged industry to be proactive and identify/resolve potential safety culture issues before they became regulatory concerns.
- IMC 0612 working group
 - Approximately 64 NRC reports were being evaluated. The review by this group should be complete by the end of the year.
- Several times during the meeting reference was made back to issues that were discussed earlier in the week. The need for NRUG participants to attend the regulatory track of the ANS workshop was discussed.
- Consistency in identifying cross-cutting aspects between regions was discussed.
 - Improvement has been seen in the last two quarters.

- Data from the industry, NEI and the NRC is being considered by the NRC task force. The NRC does not consider this to be a low level issue.
- The NRC has seen improvements in application and communication with inspectors and supervisors.
- The NRC commented that it may be helpful to compare cross-cutting related finding results between fleets.
- Documentation of cross-cutting issues in PI&R reports was discussed.
 - There is a concern that during PI&R inspections, previously identified NRC violations are evaluated and associated with cross-cutting aspects that are different than the aspects identified in the original inspection report. For example, a violation from a 2006 report may identify an NVC as having a cross-cutting aspect in human performance. During a later PI&R inspection, the same violation is used as an example of not promptly identifying issues. The RUG chairs were requested to provide examples to Roy Caniano and the regional administrators.

10. B5b update

- The NRC stated that the goal was to provide all licensees with safety evaluation (SE) reports by the end of August.
- A one time SE based temporary instruction will be developed. A draft should be completed by September. Current plans are for this to be a mini-team inspection that will be performed in 2008. B5b related activities will eventually be incorporated into existing baseline inspections as appropriate in lieu of a dedicated B5b inspection. A workshop for the new TI may be conducted later this year. Overall, the TI is expected to take 14-15 thousand inspector hours.

11. Generic Safety Issue 191 update

- The overall industry effort was summarized (sump improvements, chemical effects etc.)
- Several utilities have requested Generic Letter due date extensions.
- The complexity and uniqueness to each plant was discussed.
- Industry asked how final acceptance for each utility will be documented.
 - NRC has an action item to provide details on how closure will be accomplished and documented.
- Chemical effects were discussed. This is actually a different safety issue than was originally identified in GSI 191. Ultimate resolution will involve more than a mechanical solution. Industry expressed a concern related to the difficulty of demonstrating compliance. NRC is looking for a good faith effort. Continued resource demands on industry and the regulator are expected. The need for further testing was discussed. More specific information is needed to identify closure requirements.

12. General Inspection Issues

- A general discussion was held on the identification and processing of generic issues. This topic was discussed earlier in the week. The need for clearly distinguishing between licensing issues and ROP issues was discussed. Industry will provide further clarification on this issue.
- Industry is looking for a process that engages the utilities and clearly separates generic industry issues from ROP compliance issues.
- NRC discussed the limitations of the Task Interface Agreement (TIA) process. An FAQ process may be a solution.
- Items of generic interest to the NRC are provided on the public website.
- The NRC stressed the importance of working through regional management to resolve inspection concerns.
- The general nature of the NEI white paper was discussed. NRC discussed the need to place the white paper in context such that the purpose and desired response are clearly communicated.

13. Regulatory Stability

- A presentation by TVA acknowledged the need for continuing improvement with the ROP, but expressed concerns related to the change process. The following concerns were discussed:
 - Rulemaking with no direct tie to nuclear safety.
 - New requirements imposed through changes to NRC processes/framework.
 - Imposition of new requirements by “regulation through inspection”.
 - Changes to performance indicators based solely on improved licensee performance.
- NRC discussed the need for common understanding and stated that the ROP was a dynamic process that would experience continual change. Realignment will always be necessary to ensure that inspections are directed at the appropriate issues. Re-directing the inspection effort to consider different aspects of the existing licensing basis does not constitute a back-fit. The need to document the basis of acceptance was discussed. This is a topic discussed previously in the week. The focus is the reasonable assurance of safety.
- The overall industry concern is that when the bar is raised, the change is implemented through the appropriate process. New requirements should not be introduced through the inspection process.

14. Component Design Basis Inspections

- NRC discussed the basis of the inspections. Three activities are ongoing:
 - Procedure changes are being considered.
 - Budget requirements are being evaluated.
 - Contractor support is being evaluated at the Commission level.

- NRC acknowledged industry concerns with resources required to support CDBIs.
- Industry inquired as to whether consideration had been given to providing licensees credit for self-assessments as a method for reducing inspection hours. NRC stated that there had been some discussion but no decisions. The impact of engineering issues on extended plant shutdowns was discussed. A prolonged shutdown of a plant could have an adverse affect on new construction.

15. Power Up-rate lessons learned

- NRC discussed concerns with up-rates.
 - Most SEs are overdue.
 - Long-term impact on the up-rated plants is of concern.
 - Each plant is unique. Benchmark data therefore may not be available.
 - This is a high priority issue that requires careful attention by industry and owner's groups. Many issues are first of a kind. BWRs are of particular concern and steam dryer problems were discussed as an example.
 - Modeling difficulties were discussed.

16. Heavy Loads Lessons Learned

- Control of heavy loads became an area of focus after utilities began to replace reactor vessel heads.
- Licensing basis is not clear.
- Several different generic communications have been issued over the years.
- The focus should be determining requirements and performing future activities safely (safe load paths, single failure proof cranes, etc.). The NRC will consider enforcement discretion for historical issues.
- The NRC is open to proposed solutions and encouraged cooperation between NRC, NEI and chief nuclear officers.
- Inspections in this area will be performed during fall 2007 outages.

17. NUREG 1022

- A revision has been discussed but currently there is no implementation schedule.
- The operating experience group is the NUREG owner.
- Industry stated that experience was an important factor when interpreting the guidance and clarification was needed to ensure consistent application. The issue becomes more important as the industry and the NRC experience turnover of personnel.
- NRC will determine whether NUREG 1022 has the correct owner and decide whether a revision is necessary.

18. Task Interface Agreement (TIA)

- Industry summarized the need for licensee involvement particularly up front engagement such that all facts are understood. This is critical since TIAs are sometimes publicly available.
- NRC stated that completion time was approximately seven months and six months was the goal.
- Two TIAs are currently being processed.
- NRC stated that the process was originally intended to be for NRC internal use only and should function in that fashion. An FAQ type process would be more appropriate for obtaining licensee input.
- NRC stated that if the process were structured such that there was no exposure or risk to the licensee, up front involvement would not be necessary.
- As discussed in an earlier session, NRC will evaluate the TIA process and determine whether changes are needed in the ROP.

19. NRC Fees

- Industry discussed the difficulty in factoring fees into the budget process. The following questions were asked:
 - Are fixed fee reductions anticipated as fees are recovered as part of new reactor licensing?
 - Will overall inspection hours potentially be reduced as the inspection process is optimized ?
- NRC is limited as to how much financial information can be disclosed prior to making the budget publicly available. However, several meetings were held with NRC management, the NRC Chief Financial Officer and NEI to develop a fee algorithm.
- The NRC is increasing the staff in anticipation of new plant license submittals. Future fees will depend on how many of the projected license requests are actually submitted.
- Laurie Lahti agreed to discuss the fee projection issue with NEI and provide feedback to the NRC.

20. Open Discussion

- Overlap between ANS and NRUG topics was discussed. There needs to be more planning in the future to avoid duplication. The ANS presentations are more appropriate for items of general interest, where the NRUG should be focused on topics that need to be discussed in detail.
- The availability of corporate and plant information to the NRC was discussed. Licensees need to be aware that certain corporate level activities (insurance claims, etc.) may involve information that is critical to the inspection process. This sensitivity needs to be understood at all management levels of the corporation (nuclear and non-nuclear).

- The limited ability for the NRC to assess licensing activities under the ROP was discussed. Such items include submittals related for power up-rate, license renewal, other license amendments and responses to violations. Document quality is an important component for managing resources for the NRC and licensees.
 - The NRC acknowledged that expectations have not been clear.
 - The NRC budget is based on a one year processing cycle. Submittal requests that are needed in less than a year, e.g., those that are necessary to support outages, place a strain on resources.
 - Measurement and accountability for both parties is necessary.
 - Submittals should be rejected if established standards are not met. Precedent must be applicable to the unique aspects of each plant's design. Similarly, it is important for RAIs to be accurate and relevant.
 - Laurie Lahti agreed to discuss the issue with NEI for possible consideration by the LATF.

The meeting was adjourned at approximately 1700. Action items are provided in Attachment I.

Attachment I, Action Item List

Item	Owner	Action	Status
1	Rob Sweet	Obtain the current NRC information related to watchstanding credit and transmit to NRUG members.	
2	RUG Chairs	Provide Roy Caniano feedback on cross-cutting concerns.	
3	PI&R RUG leads	PI&R inspection reports: Provide examples where previously identified NRC violations are evaluated and associated with cross-cutting aspects that are different than the aspects identified in the original inspection report.	
4	NRC DSS	Provide details on how closure of GSI 191 will be accomplished and documented.	
5	NEI	Provide clarification as to which generic issues are related to licensing and which are related to compliance.	
6	NRC DIRS	Determine whether NUREG 1022 has the correct owner and evaluate the need for a revision.	
7	NRC DPR	Evaluate the TIA process and determine whether changes are needed in the ROP.	
8	Laurie Lahti	Discuss the NRC fee projection issue with NEI and provide feedback to the group.	
9	Laurie Lahti	Discuss evaluation of license submittals under the ROP with NEI for possible consideration by the LATF.	