

August 5, 2008

MEMORANDUM TO: Stacey L. Rosenberg, Chief  
Special Projects Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager */RA/*  
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Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JUNE 4, 2008, OPEN MEETING WITH THE BOILING  
WATER REACTOR OWNERS' GROUP (BWROG) WITH SENIOR  
MANAGEMENT (TAC NO. MB5757)

On June 4, 2008, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of the BWROG at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to develop common understanding between the Office of Nuclear Reactor Regulation (NRR) senior management and the BWROG executive members of topics discussed and reach agreement and common understanding of any actions assigned and associated due dates. Members of the public were in attendance. Public Meeting Feedback forms were not received.

#### Introductions

Mr. Eric Leeds was introduced as the new Director of NRR. A complete list of attendees is enclosed.

#### Opening Remarks

The BWROG presented opening remarks and information on the schedule/process review of selected submittals and a review of industry issues. The BWROG handouts are available in the Agencywide Documents Access and Management System as ML081990378.

Mr. Rich Anderson (FPL Energy), BWROG Executive Chair, provided opening remarks including a review of the BWROG mission, organization structure, and current industry leadership. Mr. Anderson also reviewed how the BWROG interacts with other industry groups including the Nuclear Energy Institute (NEI), the Pressurized Water Reactor Owners' Group (PWROG), the Electric Power Research Institute (EPRI), and international organizations.

Mr. Anderson shared the most recent successes between the BWROG and the NRC including issuance of safety evaluations for topical reports (TRs) on safety relief valve (SRV) position indication, pressure-temperature (PT) curve methodology (from Structural Integrity Associates (SIA)), and Risk-informed Technical Specifications Surveillance Intervals (5b).

Mr. Andersen shared the benefit of using the Consolidated Line Item Improvement Process (CLIIP) for technical specification changes. CLIIP amendments average 1/10th the cost of a

normal amendment and are approved in an average of six months. Since 2000, the NRC has approved 186 licensee amendment requests based on CLIIP data for BWROG plants, for a collective NRC review fee saving of ~\$7M. Mr. Anderson also shared a graphical presentation to show the industry utilization of these CLIIP changes.

Mr. Rick Libra (Exelon), BWROG Executive Vice Chair, provided a summary of the division of responsibility between the BWROG and the BWR Vessel Internals Program (BWRVIP). Mr. Libra included that the executives on the oversight committees are common between the two but different Chair and Vice Chairs.

#### Schedule/Process Review of Selected Submittals

Mr. Randy Bunt (Southern Nuclear Company (SNC)), BWROG Chair, provided a status of current BWROG submittals.

#### Review of Industry Issues

Mr. Doug Coleman (Energy Northwest (ENW)), BWROG Vice Chair, provided an update from the last EOC/NRC meeting on actions taken by the BWROG to address TRs submittals that have taken a longer time in the review process than anticipated.

Mr. Coleman shared that the BWROG has established Challenge Boards for the committees prior to submittal of TRs and request for additional information (RAI) responses to the NRC staff. Mr. Coleman feels this has been successful, the first one conducted was for ODYSY RAI response, and follow up indicated only one question on the RAI response from the NRC after submittal and this was clarified without an additional RAI.

Mr. Coleman shared that the BWROG Chair and Vice Chair are the decision-makers regarding conflicts or issues concerning NRC feedback and will be present at meetings with NRC.

The BWROG committees use the corrective action program to document any TR rejections; use written documentation to capture positions, understandings, and agreements during pre-submittal meetings; and elevate issues to the BWROG Chair when differing opinions arise.

Mr. Coleman also shared that the industry is collaborating with the NRC as a whole to address TR process improvements. A working group has been formed and meets every four to six weeks. Focus is on three major improvement areas:

- Understanding and support for the TR process
- Work management (schedule/resources)
- Standardization of TR submittals

Mr. Jack Grobe (NRC) commented:

- Ensure correct NRC staff and management attend the pre-submittal meeting
- NRC has experienced huge growth, split offices with new reactors, established a knowledge transfer program, time of transition for NRC

Mr. Paul Davison (PSEG) described the concerns with Technical Specification Task Force (TSTF) Traveler-493, Instrument Setpoint Methodology, delays. This effort started in 2002 and

the NRC staff has consistently stated that this is not a significant safety issue. However, three revisions have been submitted, the latest in January 2008. In March 2008, the NRC issued a letter stating that the *Federal Register* Notice of Availability will be issued by September 2008. Both the BWROG and PWROG have exhausted all budgeted funding for this issue and request NRC management involvement to bring this issue to resolution.

NRC staff comments:

- Revision 0 was unacceptable in that it diverged from the RIS guidance
- Staff believes they have reached resolution with the PWROG
- Staff does not believe the BWROG has submitted a list of limiting safety system settings (LSSS)
- Mr. Eric Leeds directed the staff to regroup on this issue internally then meet with the industry to solve this issue

Mr. Libra presented the current status of TR NEDO-33148, "Separation of LOOP from LBLOCA." At request of the NRC staff, this project was initiated in 2002 and the BWROG has expended ~\$3M over the last six years. Though the NRC and the BWROG have engaged in an ongoing series of interactions to resolve issues, new issues continue to arise. The BWROG no longer has confidence that this TR will improve risk profiles nor remain cost effective for implementation. The BWROG is withdrawing this submittal.

NRC staff comments:

- Questions on whether there was domino effect in that this change impacted other regulatory positions and this led to additional questions
- Discussed how these issues should be ironed out in pre-application meetings. Similar issues being reviewed internally can impact a TR submittal.
- NRC suggested that maybe it wasn't the right time for this submittal

Mr. Dennis Madison (SNC) provided background and an update of proposed activities the BWROG is considering for addressing the disparity between the treatments of BWR strainers and the current treatment of PWR strainer evaluations under Generic Safety Issue (GSI)-191. Mr. Madison utilized a process map that identified the relationship of strainer issues and the proposed resolution logic. A meeting with the NRC staff to discuss the BWROG approach is scheduled for the following day.

NRC staff comments:

- Mr. Bill Ruland indicated this was the first time the NRC staff had seen this graphic and looked forward to discussing this issue at the public meeting the following day.
- Ms. Michele Evans suggested now is the time to backup and look at the big picture.
- Mr. Grobe stressed not to underestimate the complexity of the questions and reaction with less technical answers can cause extension of effort such as occurred in PWRs.

The BWROG added that it is coordinating with the PWROG and the NEI to ensure lessons learned are shared.

Mr. Joe Donahue (Progress) provided a background and an update of current BWROG activities supporting response to Generic Letter 2008-01. The NEI is coordinating the industry response and the BWROG is a member of the Gas Accumulation Team (GAT) formed by the

NEI. The BWROG supported development of the evaluation template used for short-term actions. Mr. Donahue shared that a number of BWR plants were required to make three-month responses since detailed piping system walk downs fall outside the nine-month response period based on accessibility (drywell).

The BWROG and the PWROG are coordinating work and have developed detailed short- and long-term action plans including development of generic void acceptance criteria, plant surveys, and evaluating the need for additional pump testing.

Mr. Donahue also shared that the next industry workshop is planned for the week of July 28, 2008, and encouraged the NRC staff to continue to participate in the workshops.

NRC staff comments:

- Mr. Ruland indicated that it appears the industry is taking a more aggressive approach than with sump strainer issues.
- Mr. Grobe suggested that this appears to be a successful effort and we should look at this situation for lessons learned to apply in the future. Possibly the occurrence of the Wolf Creek issue during the kickoff of this discussion impacted the response.

The BWROG commented that we addressed this issue at a management level first prior to engaging the technical resources. Also the use of the workshop and NRC attendance to get the message communicated to the industry worked.

#### Review of NRC Concerns

The NRC staff discussed the following: status of various steam dryer TR reviews, an upcoming RIS on mitigating strategies implemented in response to security orders, TR budget projections, and GSI-193, "BWR ECCS [Emergency Core Cooling System] Suction Concerns."

Mr. Patrick Hiland (NRR) provided a brief overview of the current status of the BWRVIP steam dryer TRs.

Mr. Mark Cunningham (NRR) shared that an upcoming RIS entitled "Mitigating Strategies Implemented in Response to Security Orders in Risk-Informed Licensing Actions and in the Significance Determination Process" will discuss how changes implemented to support the B.5.b efforts can be credited in risk-informed licensing actions and significance determination process. The degree to which credit can be taken will be dependent on the rigor of implementation such as formally including the actions in procedures and training. Expect issuance in July 2008.

Ms. Stacey Rosenberg (NRR) discussed the TR review and budget projections and requested that the BWROG supply a prioritized list of submittals to the NRC as requested during the working group discussions. The BWROG indicated they would supply a list of future submittal but prioritization or categorization is still a subject that the working group is addressing. Mr. Leeds indicated that the NRC staff can prioritize its own work; however, they may ask submitting organization for more information such as how many plants will implement each TR. Budgeted resources may limit the number of TRs that can be reviewed.

Mr. Jack Foster (RES) discussed GSI-193 and explained that the NRC had previously discussed this with the BWROG and had obtained the Nordic Owners' Group report that the BWROG had referred them to for additional information. This report did not directly transfer to this application and the NRC staff would like to continue to collaborate with the BWROG. Specifically, the NRC staff is interested if the BWROG can provide specific design information regarding the timing between ECCS blowdown and the start of ECCS pumps. The NRC staff believes if it can get this information it may resolve this issue.

The BWROG agreed to ask General Electric-Hitachi if this design information is available and provide it to the NRC staff. The BWROG asked that a letter requesting the information be sent the BWROG Chair describing the specific request.

### Action Item Review

Ms. Michelle Honcharik (NRR) summarized a list of actions items and agreements reached during the meeting:

1. NRR management will internally discuss issue regarding TSTF-493, then schedule meeting to discuss with industry (BWROG, PWROG, TSTF).
2. BWROG to withdrawal LOOP/LOCA TR.
3. BWROG share common cause data results from TR submittal issues with NRC at next meeting.
4. BWROG to hold more drop-ins with NRR senior management.
5. For "cutting edge" TRs, BWROG and NRR will engage executives and senior management earlier in review process, before there are problems.
6. BWROG to provide detailed information several weeks in advance of pre-submittal meetings.
7. NRC will plan a conference call with key leadership a few weeks after the June 5, 2008, ECCS strainer meeting.
8. BWROG to provide the NRC staff with a copy of NEI white paper related to the planned RIS on Mitigating Strategies Implemented in Response to Security Orders in Risk-Informed Licensing Actions and in the Significance Determination Process.
9. BWROG provide input to NRC on expected TR submittals as requested in NRC letter.
10. BWROG share feedback on TR limitations and conditions provided by the NRC staff at the next meeting.
11. NRC to provide an information request with details regarding GSI-193.

### Public Comments

Mr. Steven Dolley of Platts asked about TR priorities, because it was unclear from discussions during the meeting as to whether or not the BWROG was going to provide the NRC staff with the requested prioritized listing of planned TR submittals. Mr. Grobe (NRC) commented that the NRC is working to develop a prioritization process and will prioritize its workload with input from the BWROG. Mr. Leeds commented that the NRC has asked industry to prioritize their planned submittals, but we cannot force them to do so. The NRC staff will prioritize its own work.

Closing Remarks

Mr. Leeds closed the meeting by remarking that this was very useful to him, since he is new to the NRR. He also commented that he was glad to have the dialogue and wants it to continue, because it brought constructive energy to the issues.

Please direct any inquiries to me at 301-415-1774, or [michelle.honcharik@nrc.gov](mailto:michelle.honcharik@nrc.gov).

Project No. 691

Enclosure: List of Attendees

cc w/encl: See next page

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R. Libra  
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