May 21, 2009

MEMORANDUM TO: Rani Franovich, Chief
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Kennard Buddenbohn, Reactor Operations Engineer ***/RA***
By John Thompson Acting for/
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING HELD ON APRIL 15, 2009

On April 15, 2009, the U.S. Nuclear Regulatory Commission (NRC) staff hosted the monthly Reactor Oversight Process (ROP) Working Group public meeting. The attendance list for the meeting is contained in Enclosure 1, and the agenda is contained in Enclosure 2.

Meeting attendees discussed the priorities for the ROP Working Group. The priorities are: (1) accounting for unavailability (UA) prior to post-maintenance testing (PMT) for the Mitigating Systems Performance Indicator (MSPI); (2) determining appropriate use of the MSPI front stop (risk cap); and (3) issuing the final Draft, Revision 6, of Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline."

The staff updated industry on the progress of the NRC ROP realignment process for calendar year (CY) 2009. This is a biennial review to ensure the most effective application of inspection resources for the purposes of verifying reactor safety. The effort this year is intended to be inspection resource neutral to maintain the current level of baseline inspection effort. Changes resulting from ROP realignment effort for CY 2009 will be made effective in CY 2010.

Meeting attendees discussed the staff's four white papers, previously provided, on the MSPI regarding: (1) accounting for unavailability (UA) prior to post-maintenance testing (PMT); (2) appropriate use of the front stop (risk cap); (3) additional guidelines for when the planned UA baseline can be updated; and (4) a proposed change to the emergency diesel generator (EDG) component boundary.

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301-415-1011

Meeting attendees discussed the MSPI PMT issue (first of four white papers) provided during the March 2009 meeting. The industry and staff explored criteria for equipment availability determination prior to the equipment being declared available by the plant operations staff. This topic will be discussed at the next ROP Working Group meeting.

Meeting attendees discussed the second white MSPI paper on the appropriate rounding methodology to be used for the unavailability (UAI) and unreliability indices (URI). The industry discussed a counter-proposal to the front stop (risk cap) provided in a handout previously distributed at the February 2009 meeting. The two proposals centered on reaching consensus on two attributes for the MSPI risk cap: (1) that the risk cap be applied at the occurrence of the first significant failure, and (2) that the guidance remain unchanged concerning not applying the risk cap if the MSPI exceeds a core damage frequency of 1×10^{-5}. The proposed change would affect how the MSPI risk cap is applied by the Consolidated Data Entry (CDE) software used for MSPI and maintained by the Institute of Nuclear Power Operations (INPO). The industry has committed to providing a timetable for the completion of the CDE software update once consensus is reached on how the risk cap should be incorporated into the MSPI calculation. This topic will be discussed at the next ROP Working Group meeting.

Meeting attendees discussed the third white MSPI paper regarding additional guidance for when the planned MSPI UA baseline should be changed and what risk-informed criteria should be used to justify a change in the baseline. The industry and staff are still considering the appropriateness of how plant modifications will be reflected in accounting for unavailability to the planned UA baseline. The industry will provide definitions for planned maintenance and maintenance philosophy at the next ROP Working Group meeting.

Meeting attendees briefly discussed the fourth staff white paper regarding the MSPI EDG Component Boundary issue. The industry and staff are still evaluating the merits of adding the EDG fuel oil transfer pumps into the scope of MSPI unreliability component boundary monitoring. This topic was deferred pending additional review by the staff.

Meeting attendees discussed a March 2009 industry white paper on the Unplanned Power Changes per 7000 Critical Hours PI. The purpose of the paper was to improve upon the guidance and define the circumstances for when changes in reactor power level would count in this indicator. Industry will propose a definition at the May 2009 ROP public meeting that defines when the 72 hour clock starts following discovery of an off-normal condition.

Meeting attendees discussed EDG failure data examples that had been discussed at the October 2008 meeting (refer to meeting summary ML083020694). INPO, the organization that maintains the software and controls its use, committed to updating it's guidance to reinforce the need for quality data submittals by the licensees. The staff has accepted this commitment and may pursue additional analysis to validate future MSPI data submittals.

NEI provided a handout with proposed guidance changes to EDG failure mode definitions used for calculation of URI (Enclosure 3). The staff will need to evaluate the impact of these proposed definition changes to see if they impact the industry generic EDG component failure rates prior to MSPI initial implementation in 2006.

NEI also discussed the status of the draft revision 6 to NEI 99-02. NEI stated it received staff comments and were working to incorporate the comments into the draft. The industry expected to have a final draft ready for discussion during the May 2009 meeting.

During the meeting, the staff provided a handout (Enclosure 4) with questions regarding the industry's proposed future changes to the Unplanned Scrams per 7,000 Critical Hours PI. A written response to these questions will be provided by the industry at the May 2009 ROP public meeting.

Several Frequently Asked Questions (FAQs) on performance indicators (PIs) were discussed during the public meeting (Enclosure 5). Licensee representatives from the Cooper Nuclear Station discussed an MSPI PI Frequently Asked Question (FAQ) concerning failure of the EDG fuel oil day tank float operated valve. This event resulted in an October 2008 failure of the EDG to operate during a surveillance test. The staff will provide its response to the FAQ at the May ROP Working Group meeting. Industry briefly discussed an Alert and Notification System Reliability (ANS) PI FAQ on the topic of "Pre-conditioning." Licensee representatives from San Onofre Nuclear Generating Station introduced an MSPI PI FAQ on the topic of "Auxiliary Feedwater Pump Failure." Licensee representatives from Brunswick Steam Electric Plant introduced an Unplanned Scram with Complications (USwC) PI FAQ on the topic of "Loss of Feedwater after a scram." The industry provided the FAQ log (Enclosure 5). These FAQs will be discussed at the next meeting.

The status of the draft FAQs is as follows:

Temp No.	**PI**	**Topic**	**Status**	**Plant/ Co.**
09-01	MSPI	EDG Failure	Introduced (March 2009) Discussed	Cooper
09-02	ANS	Pre-conditioning	Introduced (March 2009) Discussed	Industry
09-03	MSPI	AFW Pump Failure	Introduced	SONGS
09-04	USwC	Loss of FW after scram	Introduced	Brunswick

The date for the next meeting of the ROP Working Group is May 20, 2009. A future ROP monthly meeting date is June 17, 2009. A future, tentative, meeting date is July 22, 2009.

Enclosures:
1. Attendance List – April 15, 2009
2. Agenda – April 15, 2009
3. NEI Handout
4. Staff Questions Regarding the Industry's Proposed Future Changes to the Unplanned Scrams per 7,000 Critical Hours PI
5. FAQ Log

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Enclosure 4 – ML091380518 Enclosure 5 – ML091180247

OFFICE	NRR/DIRS	NRR/DIRS	ABC:NRR/DIRS	BC:NRR/DIRS
NAME	KBuddenbohn	JThompson	JIsom	RFranovich
DATE	5 / 6 /2009	5 / 7 /2009	5 / 7 /2009	5 / 21 /2009

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ATTENDANCE LIST
INDUSTRY/STAFF ROP PUBLIC MEETING
April 15, 2009

	NAME	AFFILIATION
1	Duane Kanitz	STARS
2	Ken Buddenbohn	NRC
3	Jeff Thomas	Duke
4	David Helker	Exelon
5	Glen Masters	INPO
6	Jim Peschel	FPL
7	Roy Linthicum	Exelon
8	Mark Giles	Entergy
9	Thomas Houghton	NEI
10	John Billerbeck	NRC
11	Fred Mashburn	TVA
12	Robin Ritzman	FENOC
13	Dave Midlik	SNC
14	Jin Chung	MNES
15	Gary Miller	Dominion
16	Art Zaremba	Cooper/NPPD
17	Rani Franovich	NRC
18	Bruce Mrowca	ISL
19	Arthur Salomon	NRC
20	Lee Kelly	SONGS
21	Ken Heffner	Progress/NEI
22	John Thompson	NRC
23	Allen Nelson	NEI
24	Michael Chambers	NRC
25	Greg Warnick	NRC
26	G. Singh Matharu	NRC
27	Geoff Cook	SONGS
28	Gary Segich	SONGS
29	Ned Tyler	Constellation Energy
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REACTOR OVERSIGHT PROCESS (ROP)
MONTHLY PUBLIC MEETING AGENDA

April 15, 2009 - 9:00 AM – 3:30 PM – TBMP 05-E01

9:00 – 9:05 AM	Introduction and Purpose of Meeting
9:05 – 9:25 PM	Performance Assessment Branch Topics 1. General topics of interest in the performance assessment area 2. Opportunity for public comment
9:25 – 9:45 AM	Reactor Inspection Branch Topics 1. General topics of interest in the inspection area 2. Opportunity for public comment
9:45 – 10:30 AM	Discussion of Performance Indicator Topics 1. Potential NEI 99-02 guidance changes • MSPI "available but not operable" 2. Opportunity for public comment
10:30 – 10:45 AM	Break
10:45 – 12:00 PM	Discussion of Performance Indicator Topics (continued) • MSPI rounding error • MSPI planned/unplanned unavailability • MSPI EDG component boundary 3. Opportunity for public comment
12:00 – 1:00 PM	Lunch
1:00 – 2:15 PM	Discussion of Performance Indicator Topics (continued) • IE03 – Clarifying 72-hour clock • IE01 – Unplanned scrams 4. EDG failure data 5. Proposed change to EDG failure mode definitions 6. Draft NEI 99-02, Revision 6 discussion 7. Opportunity for public comment
2:15 – 2:30 PM	Break
2:30 – 3:15 PM	Discussion of Open and New PI Frequently Asked Questions (FAQs) *Note: topic may be moved up if meeting is ahead of schedule. The latest draft FAQs are located on the public web at http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/draft_faqs.pdf. This list is subject to change the day before the meeting based on availability of new draft FAQs provided by the Nuclear Energy Institute. Public comments will be addressed on FAQs following the discussion.*
3:15 – 3:30 PM	Future Meeting Dates, Action List Status, Agenda Topics