

## Industry Handout

### I. NEI activities since the last meeting on May 7, 2009

- a) *List of potential issues for future pilots (see item III.d)*
- b) *Updated the Evaluation Phase C of the Flow Chart (see item IV.a)*
- c) *Formed a Medium Voltage Cable (MVC) pilot team & scheduled the first NEI meeting (see item V)*

### II. Open issues from last meeting

#### a) *Status of NEI's RIRP White Paper (October 2008)*

- Superseded by RIRP Flow Chart + explanatory text
  - Flow Chart to be updated for the next public meeting (6/9/09)
  - Explanatory text (under development)

#### b) *Define and describe NRC and Industry roles and responsibilities*

- Executive sponsors and oversight
- Team members (licensing and engineering)
- Peer review

#### c) *Develop options for implementing the results of Phase C (Evaluation)*

- The objective of RIRP is not necessarily to get to a better (technical) place, but to devise a better way to make the journey
- Apply the appropriate existing regulatory process
  - Generic communication
  - Industry guidance document
  - Licensing action
  - TSTF Traveler
  - Consolidated line item improvement process (CLIIP)
  - Plant-specific docketed commitments
  - Formal Industry Initiative
  - Regional inspections

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### III. Interactive discussion topics:

#### a) *Define roles of industry and NRC*

- The Industry RIRP effort is under the umbrella of the Licensing Action Task Force (LATF) to ensure a consensus Industry response
  - Clearinghouse for collecting potential RIRP issues from all parties for screening
  - Coordinate Industry activities in support of the various RIRP phases
  - Oversight of the RIRP
  - Communication of resolution and industry implementation
  - Make sure relevant information and industry perspectives are provided to NRC.
  
- The NRC RIRP effort is coordinated by the Office of Nuclear Reactor Regulation (NRR) to ensure a common agency-wide decision
  - Regulatory lead by the Division of Policy and Rulemaking (DPR), with assistance from the Division of Operating Reactor Licensing (DORL)
  - Participation by other NRC organizational groups (engineering, Regions, OGC, and others)
  - The final regulatory decision lies with the NRC
  
- Independent NRC and Industry teams
  - Each team comprised of a management sponsor, regulatory subject matter experts, and technical subject matter experts
  - NRC and Industry teams prepare prior to public meetings
  - Use public working meetings to resolve comments and questions
  
- Knowledge transfer
  - Capture lessons learned and good practices
  - Terms and definitions
  - Applicable requirements and interpretations
  - Input to NRC and Industry training programs
  
- Traceability
  - NRC options (e.g., Web page, ADAMS)
  - Industry options (e.g., NEI Web Boards)

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### *b) Success criteria for closing an issue*

- Compliance with existing regulatory obligations (i.e. 10CFR, Operating license, orders, or other binding requirement)
- Conformance to additional regulatory obligations associated with the issue, if any (such as docketed commitments)
- Identification of appropriate regulatory processes to modify the above obligations, with clear understanding and acknowledgement by all parties, for example:
  - Licensing actions
  - NRC inspection & enforcement activity
  - Rulemaking
  - Orders
  - Other licensee actions, such as FSAR updates, procedure changes, etc.
- Implementation of industry actions necessary to address existing and proposed obligations
- Documentation of the above by both NRC and Industry:
  - Plant-specific documentation of implementation
  - Durable documentation of regulatory and industry position/interpretation, with industry and NRC commitment to support the final resolution
- Apply the RIRP to manage new information or proposed changes to the prior acknowledgement issue closure

### *c) Application of Risk*

- When is it appropriate to use risk information in Phase B (screening) and Phase C (evaluation)?
- How can risk information be applied in Phases A & B?
- Is there a risk threshold for screening issues in or out?
- To what extent does the use of risk information depend on plant-specific PRA quality?

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*d) Potential issues for future pilots:*

- EDG voltage/frequency
- Weld overlays and leak-before-break
- 10 CFR 50.59 and method changes
- Interpretations of transformer/switchyard design basis
- Onsite/Offsite power issues
- RAIs on proposed use of polyethylene piping to replace ASME Class 3 piping in buried low temperature applications

IV. Path Forward on RIRP

*a) Discuss updated Flow Chart (6/9/09)*

*b) Continue NRC/Industry dialogue on the attributes of a “problem statement”*

*c) Continue developing the Flow Chart and explanatory text via public meetings*

*d) Incorporate NRC comments*

*e) Meetings*

- Next public meeting July 7
- Schedule August & September RIRP public meetings

V. Medium Voltage Cable (MVC) pilot

*a) Develop an MVC Problem Statement*

*b) Schedule*

- First public meeting (~ late June)
- Discuss need for facilitated meetings

*c) Team members:*

- Industry (management, technical, licensing)
  - STARS, Wolf Creek, Entergy, Constellation, Progress Energy, Exelon, EPRI, NEI
- NRC