

January 5, 2010

MEMORANDUM TO: Mark Kowal, Branch Chief  
Technical Specifications and ITAAC Branch  
Division of Construction Inspection  
& Operational Programs  
Office of New Reactors

FROM: Calvin Cheung, Reactor Operations Engineer */RA/*  
Technical Specifications and ITAAC Branch  
Division of Construction Inspection  
& Operational Programs  
Office of New Reactors

PARTICIPANTS: Public, Industry, and NRC Staff

SUBJECT: SUMMARY OF December 9, 2010, NRC CONSTRUCTION  
INSPECTION PROGRAM CATEGORY 3 PUBLIC MEETING  
WITH THE INDUSTRY AND THE GENERAL PUBLIC

On December 9, 2010, the Nuclear Regulatory Commission (NRC), Office of New Reactors (NRO) held a public meeting to discuss various topics relating to new reactor construction (Agencywide Documents Access and Managements System (ADAMS) Accession Number ML103270167). The purpose of the meeting was to update and solicit feedback from members of the public on the progress made in various topics related to Changes During Construction, the Simulated Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Closure and Verification Demonstration, Managing ITAAC Surge, Feedback to NEI Comments on Inspection Procedure (IP) 40600, Industry Perspectives on Vendor Inspections, and Industry plans to develop "Strategy Documents."

The meeting began with a presentation from Earl R. Libby from the Division of New Reactor Licensing (DNRL), on Changes during Construction (ML103430476). The discussion concentrated on the recent staff proposal for an alternative license amendment process to facilitate installation and testing of plant changes or modifications while an application for a license amendment was going through the detailed technical review. The alternative process requires: (1) the licensee to request the use of the alternative process, (2) a notification to the licensee from the NRC containing no objection to the installation and testing of the proposed plant change or modification, and (3) the approval of the application for license amendment prior to the implementation of the change. If the license amendment request is denied, the plant must be returned to an acceptable configuration.

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Next, Don Dube from the Division of Safety Systems & Risk Assessment (DSRA) presented the staffs' proposals for evaluating plant changes or modifications to design features relied upon to mitigate ex-vessel severe accidents (EVSA) for reactors licensed under Part 52. For a "substantial increase" in probability, there was general consensus on adopting a definition along the lines of the rule language for the ABWR design certification in Part 52, i.e.: "*A particular ex-vessel severe accident previously reviewed and determined to be not credible could become credible.*"

For increases in public consequences, use surrogate measures such as containment failure probability/frequency and fission product release fractions rather than offsite dose calculations. Dose calculations require a level-3 PRA, which is not required by the regulations for new reactors. A combination of qualitative and quantitative criteria for what constituted a "substantial increase" in public consequences seemed to be advantageous, e.g.,

- Remove or significantly degrade an ex-vessel severe accident mitigation design feature, or
- A combination of relative increase (e.g., order of magnitude) and contribution of the change to total containment failure probability/release fraction might suffice.

Russ Bell, from the Nuclear Energy Institute (NEI), provided some remarks on Changes During Construction. Industry will continue to provide feedback to staff for a path forward and appreciates the comments provided by the NRC.

Mahmoud Jardaneh of the Construction ITAAC Team (CIT) then presented on the Simulated ITAAC Closure and Verification Demonstration (ML103430479). Mr. Jardaneh provided a brief update on the demonstration objectives and milestones, followed by a discussion focused on the ITAAC Closure Letters (ICL) submitted by Southern Nuclear Company (SNC) as part of the demonstration. Mr. Jardaneh presented the staff feedback on how to improve ICL submittals and suggested that a detailed discussion on the topic to held at the next public meeting on January 27, 2010.

The discussion on the Simulated ITAAC Closure and Verification Demonstration continued with a presentation by Paulo Albuquerque from SNC (ML103430481). Mr. Albuquerque provided an update on the demonstration from an industry perspective and provided some corrective actions already taken on some of the lessons learned thus far. Mr. Albuquerque also discussed the progress on developing ITAAC Closure Letters for the early stage work done at Vogtle Units 3 and 4.

Next, Brian Bedford from Westinghouse Electric Company (WEC) presented on their ITAAC "Surge" Analysis (ML103430482). The "Surge" Analysis looked at Vogtle Units 3 and 4 to identify methods of reducing the surge in ITAAC closure activities during the final stage of construction. WEC identified areas of improvement in ITAAC scheduling to help flatten the peak as well as other strategies to further reduce the surge.

Following this presentation, Travis Chapman of the CIT presented the NRC's incorporation of comments received from industry on IP-40600, "Licensee Program For Managing ITAAC Closure" (ML103430494). Mr. Chapman started with a series of comments which were incorporated as editorial corrections and clarifications, and also changes which standardized terminology across the procedure. He also brought up some comments which were partially incorporated, specifically the inspection of 225 day letters, and inclusion of certain quality assurance activities that may be part of ITAAC closure in the inspection. The main idea behind partial incorporation was that these activities support the closure of an ITAAC and where applicable should be verified to have occurred. The intent is not to duplicate inspection efforts that occurred during any vendor inspections or inspections of 10CFR 50 Appendix B activities. Comments were received from Industry that ITAAC closure should be an objective activity, and this inspection should not focus on subjective aspects such as managerial oversight. The staff closed the discussion by affirming that the inspection is intended to confirm that a licensee's process for ITAAC closure is capable of ensuring all ITAAC are complete, all acceptance criteria are met, and that ITAAC closure letters can stand alone to provide the confidence that all ITAAC related activities were successfully completed.

The meeting continued with a presentation by Brandon Waites, from SNC, on Construction and Fabricator/Vendor/Supplier Oversight (ML103430503). Mr. Waites presented the Industry perspective on the difference in licensee oversight responsibilities for Construction Activities and Fabricator/Vendor/Supplier Activities. Discussion between Industry and staff met with a consensus that ultimately, the licensee is responsible for all activities.

Finally, Rick Szoch, from UniStar Nuclear, presented on Industry's plan to develop "Strategy Documents" (ML103430506). These Industry "ITAAC Strategy Documents" will provide documentation expectations and level of detail required for ITAAC closure and will support the NEI 08-01 templates. They will take lessons learned from the Simulated ITAAC Closure and Verification Demonstration as well as the ITAAC "Surge" Analysis to aide in the development of these documents.

A list of meeting attendees is attached. The next Category III public meeting is scheduled to be held on January 27, 2011 from 8 a.m. to 4 p.m. in the Two White Flint North Auditorium, in Rockville MD.

The planned dates for the next three CIP Category III public meetings for the calendar year 2011 are:

- January 27
- March 31
- May 5

Members of the public were in attendance and Public Meeting Feedback forms were distributed and submitted according to standard protocols. Please direct any inquiries to Calvin Cheung at (301) 415-2043 or Calvin.Cheung@nrc.gov.

Enclosures:  
As Stated

cc w/encl:  
See next page

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NRC-001

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NAME	CCheung	WBurton	MKowal
DATE	01/04/2011	01/04/2011	1/05/2011

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**Attendance List  
Category 3 Public Meeting (NRO)  
Two White Flint North  
October 7, 2010**

**Attendance List**

Name	Organization
Albuquerque, Paulo	SNC
Bedford, Brian	Westinghouse
Bell, Russ	NEI
Blamey, Alan	NRC
Boch, Daniel	MNES
Bowers, Anthony	NRC
Bryant, Barry	Dominion
Campbell, Patricia	GEH
Cerafici, Thomas	Bechtel Power
Chapman, Travis	NRC
Cheung, Calvin	NRC
Cohoon, John	Kiewit
Copeland, Doug	NRC
Craffey, Ryan	NRC
Cruz-Ayala, Jorge	NRC
Dube, Don	NRC
Duncan, Emily	Winston and Strawn
Fay, Tom	Toshiba
Fayolle, Francois	Unistar
Frantz, Steve	Morgan Lewis
Freebaird, Bill	Platts/Nucleonics Week
Frye, Tim	NRC
Gaslevic, James	NRC
Gears, Gerry	DOE
Giles, Julie	SCANA
Gilles, Nan	NRC
Gilligan, Bernard	Hitachi Power Systems America
Greene, Jon	Unistar
Honcharik, John	NRC
Hull, John	NRC

ENCLOSURE

Jardaneh, Mahmoud	NRC
Johnson, Andrea	NRC
Keithline, Kimberly	NEI
Kinard, Jim	AREVA
Kleeh, Ed	NRC
Kowal, Mark	NRC
Laura, Rich	NRC
Libby, Earl	NRC
Lukes, Bob	NRC
McIntyre, Rich	NRC
Murray, Demetrius	NRC
Newton, Randy	Duke
Obermiller, Nathan	MNES
Oddo, John	Shaw Group
Oesterle, Eric	NRC
Ogle, Chuck	NRC
Raleigh, Deann	Scientech
Rasmussen, Rick	NRC
Ray, Thom	Westinghouse
Rivera, Nilda	NRC
Rutzluff, Daniel	Kiewit
Schlaseman, Caroline	MPR/TANE
Shuaibi, Mohammed	NRC
Spencer, Michael	NRC
Summers, Robert	NRC
Szoch, Rick	UNISTAR
Tappert, John	NRC
Terao, David	NRC
Thomason, Stan	SNC
Thompson, Ryder	SCANA
Tracy, Glenn	NRC
Uchiyama, Junichi	MNES
Volkoff, John	Unistar
Waites, Brandon	SNC
Water, David	Progress
Webb, Michael	NRC
Weber, Carl	NRC
Wells, Russ	Areva

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(Revised 11/01/2010)

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