

PWR Owners Group



Executive Committee/NRC Meeting

March 7th, 2011

Bethesda North Marriott, Rockville, MD

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Agenda

1:45	Introductions and Opening Remarks	Amir Shahkarami, Exelon Jack Grobe, NRC
1:50	PWR Owners Group Report <ul style="list-style-type: none">• PWROG Organization• Review Actions from Previous Year• Topical Report Status	Mel Arey, Duke Jack Stringfellow, SNC
2:05	Discussion of Key Industry Topics <ul style="list-style-type: none">• PWROG Topics and NRC Perspective• NRC Topics and PWROG Perspective	PWROG/NRC
3:15	<i>BREAK</i>	
3:30	Discussion of Key Industry Topics – <i>Continued</i>	
4:45	Review of Action Items	C. Holderbaum, PMO Jonathan Rowley, NRC
4:50	Closing Remarks	Shahkarami/Grobe
5:00	Adjourn	

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
PWROG Officers

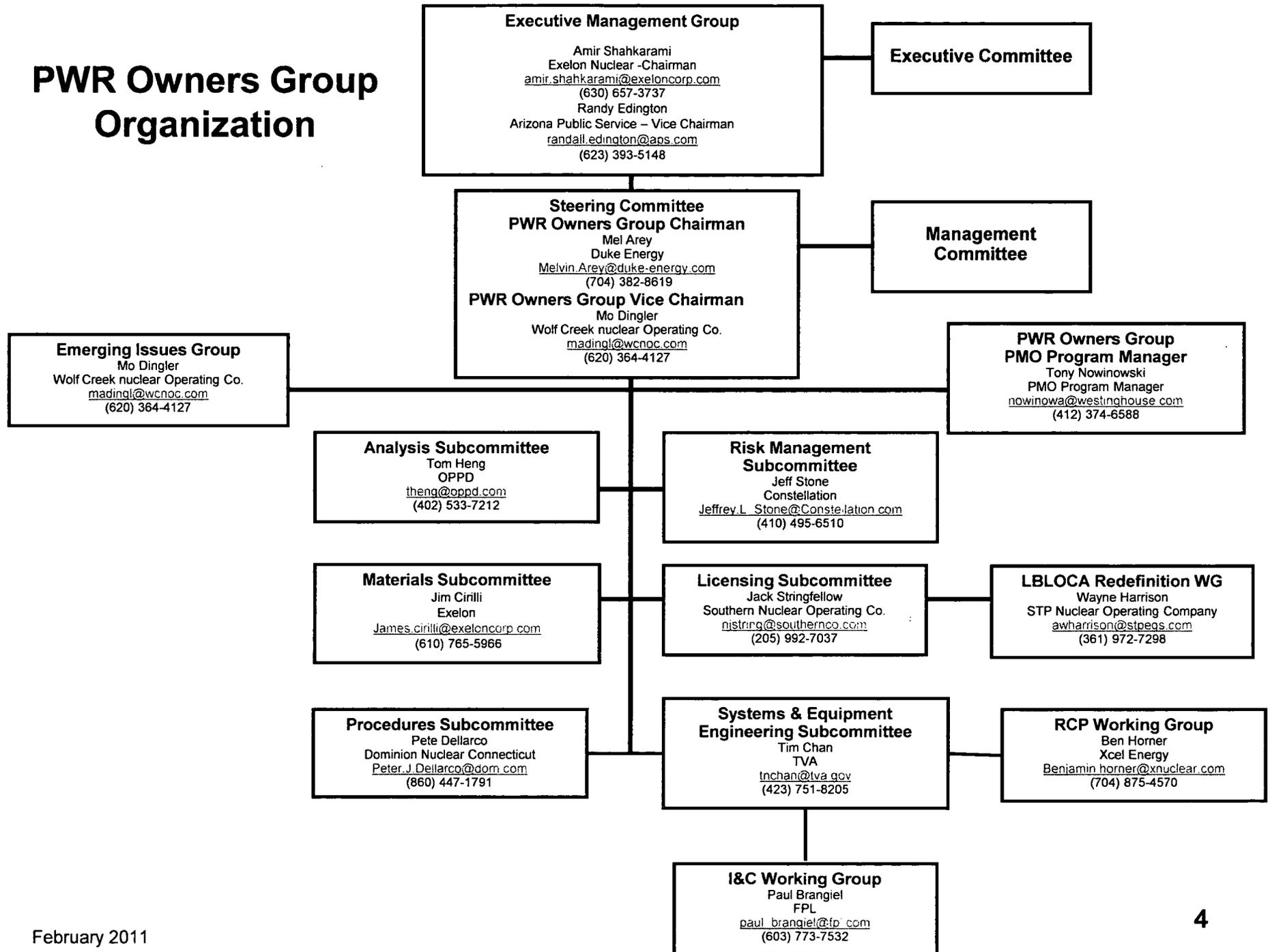
- PWROG Officers

- | | |
|----------------------------|-------------------------------|
| – Amir Shahkarami (Exelon) | Exec. Committee Chairman |
| – Randy Edington (APS) | Exec. Committee Vice-Chairman |
| – Mel Arey (Duke) | PWROG Chairman |
| – Mo Dingler (WCNOC) | PWROG Vice Chairman |

- Subcommittee Chairmen

- | | |
|------------------------------|---------------------|
| – Tom Heng (OPPD) | Analysis |
| – Jack Stringfellow (SNC) | Licensing |
| – Tim Chan (TVA) | Systems & Equipment |
| – Jeff Stone (Constellation) | Risk Management |
| – Pete Dellarco (Dominion) | Procedures |
| – Jim Cirilli (Exelon) | Materials |

PWR Owners Group Organization



PMO Organization

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Review Actions from Previous Year

- **ACTION:** Determine which previously approved TSTF Travelers have “Letter Style Approval.” Also provide what the estimated adoption of those travelers may be in the future.
STATUS: Closed - The TSTF performed an industry survey and provided the results to the NRC.

- **ACTION:** PWROG to work with NEI to schedule a joint meeting with the NRC and engage NEI/DOE/EPRI/BWROG on planning process regarding Life Beyond 60 years.
STATUS: Closed – LB60 issues to be addressed at the subcommittee level and PWROG will not pursue a joint meeting.

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Review Actions from Previous Year

- **ACTION:** PWROG Tech Spec Core Team to schedule a meeting with the NRC regarding the draft LAR prior to submittal of the GL 2008-01 (Gas Accumulation) Traveler.
STATUS: Closed - Meeting occurred on 4/28/10 and TSTF was submitted on 6/29/10.

- **ACTION:** Provide the NRC the current plan for Fire PRA.
STATUS: Closed – Requested information provided to the NRC.

- **ACTION:** Schedule a PRA leadership meeting w/the NRC (at their request) on Risk Initiative 4b on how to address Reg. Guide 1.200R2.
STATUS: Closed – Meeting has been Scheduled.

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Review Actions from Previous Year

- **ACTION:** Determine if the PWROG can supply the NRC access (or provide) to the EPRI Fire database.
STATUS: Closed - Request was forwarded to EPRI.

- **ACTION:** Arrange an EMG/NRC Drop-in visit for the Summer of 2010.
STATUS: Closed - Meeting held on 9/8/10.

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PWROG Topical Report Summary

*Jack Stringfellow, Licensing Subcommittee Chairman
Southern Nuclear Company*

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Topical Reports Approved Since 2005

2005	2
2006	3
2007	6
2008	5
2009	1
2010	3
2011	0
<hr/>	
Total	20

- **Topical Reports Currently Under Active NRC Review: 4**
– **(3 WEC / 1 AREVA)**

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Topical Reports Approved in Previous 12 months

Report	NSSS	Title	SE
WCAP-16294	W	Risk Informed Tech Spec End States	3/29/10
BAW-10179P, R8	B&W	Safety Criteria and Methodology for Acceptable Cycle Reload Analyses	5/14/10
WCAP-16125, R1	CE	Justification for Risk-Informed Modifications to Selected Technical Specifications for Conditions Leading to Exigent Plant Shutdown	5/24/10

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March 2011 Executive Committee/NRC Meeting
Topical Reports Submitted for Review and Approval
Status as of 2/15/2011

WCAP	NSSS	Title	Draft SE	TSTF
17100 Rev. 0	W & TMI	PRA Model for the Westinghouse Shut Down Seal <i>Favorable Draft SE received December 20th, 2010</i> <i>PWROG provided comments on DSE.</i>	12/30/10	N/A
17236 Rev 0	Misc	Risk-Informed Extension of the Reactor Vessel Nozzle Inservice Inspection Interval <i>Submitted for review in October 2010</i> <i>Received NRC Acceptance Letter in January 2011</i>	12/15/11	N/A

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Topical Reports Submitted for Review and Approval

Status as of 2/15/2011

WCAP	NSSS	Title	Draft SE	TSTF
16793 R1	W	<p>Evaluation of Long-Term Cooling Considering Particulate and Chemical Debris in the Recirculating Fluid (GSI-191)</p> <ul style="list-style-type: none"> • <i>Root cause process focused on unexpected results obtained at the Westinghouse test facility test is now complete</i> • <i>Testing to evaluate the repeatability of the Westinghouse test facility is complete</i> • <i>PA-SEE-0312 is being revised to provide testing and analyses to quantify conservatisms</i> • <i>Revised Draft SE date is on hold until analysis and results of additional testing is completed.</i> 	TBD	N/A

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Topical Reports Submitted for Review and Approval

Status as of 2/15/2011

BAW	NSSS	Title	Draft SE	TSTF
10192	B&W	<p>BWNT LOCA – BWNT Loss of Coolant Accident Evaluation Model for Once-Through Steam Generator Plants</p> <ul style="list-style-type: none"> •<i>Due to the delay of the RAI responses, the NRC staff can no longer support issuing the final safety evaluation on this TR within the two year review period (ML100780020)</i> •<i>All NRC staff efforts to support the review of TR BAW-10192P, Revision 2, have been discontinued</i> •<i>A new TAC will be opened and the NRC staff will continue its review upon receipt of the RAI responses</i> •<i>Responses to the RAIs were submitted and feedback from NRC indicated that review would not be initiated until after the new year due to NRC resource issues.</i> 	TBD	N/A

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Topical Reports To be Submitted

Report	NSSS	Title	Est. Date	NRC Review
WCAP-17261	<u>W</u> Café	Justification for a Technical Specification Action for Two Inoperable RTS or ESFAS Instrumentation Channels	04/11	Yes
WCAP-17308	ALL	Treatment of Diesel Generator (DG) Technical Specification Frequency and Voltage Tolerances	04/11	Yes
WCAP-17271 R1	ALL	Air Water Transport in Large Diameter Piping Systems: Analysis and Evaluation of Large Diameter Testing Performed at Purdue University (Gas Voids)	02/11	No
WCAP-17276, R1	ALL	Investigation of Simplified Equation for Gas Transport (Gas Voids)	02/11	No

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Topical Reports To be Submitted

Report	NSSS	Title	Est. Date	NRC Review
FAI/09-130	ALL	Technical Basis for Gas Transport to the Pump Suction (Gas Voids)	02/11	No
TBD	<u>W</u>	Risk Initiative 1: Technical Specification Required Action Endstates – Mode 3	Fall 11	Yes
TBD	<u>W</u> Café	Improved FQ Technical Specification Development	Spring 13	Yes

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March 2011 Executive Committee/NRC Meeting
Discussion of Key Industry Topics

- GSI-191
- LB LOCA Redefinition
- Gas Accumulation/Tech Spec Issue
- Fire PRA Peer Review Schedule
- 10CFR50.46b (*Post-LOCA Cladding Integrity*)

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March 2011 Executive Committee/NRC Meeting
Key Industry Topics – GSI-191 (LTCC)

Issue Statement:

- Long-Term Core Cooling (LTCC) Debris Filter Testing
 - The objective of this program is to provide a reasonable assurance that LTCC flow would be maintained post-LOCA when coolant is re-circulated to the reactor core from the containment sump
 - This WCAP was submitted to NRC for formal review and approval in 2007 and the PWROG received and responded to two sets of RAIs
 - The NRC provided a draft Safety Evaluation in 2008
 - Questions raised by the Advisory Committee on Reactor Safeguards (ACRS) caused NRC to withdraw the draft SE and issue a third set of RAIs

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – GSI-191 (LTCC)

Accomplishment to Date:

- The Westinghouse and AREVA (CDI) test facilities display different behavior when challenged with similar fiber loading
- NRC staff asked PWROG to address differences between vendor limits
- PWROG has proposed a program to address differences in the facilities and conservatisms inherent in the test process itself
 - Testing to quantify conservatisms inherent in fuel assembly (FA) testing and demonstrate that any small differences in facilities are insignificant in comparison to the conservative test process
 - Based on the results of this conservatism testing, the goal is that FA testing at separate vendor facilities will not be required.
 - Analytical defense-in-depth will address further conservatisms
- Public meeting with NRC staff was held 3/3/11 to review past results and further discuss path forward.

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – GSI-191 (LTCC)

Planned Activities:

Conservatism Testing

- Goal: Quantify the impact of testing more prototypical conditions on FA pressure drop
- Test Conditions:
 - Hot leg flow, 120°F water,
 - Bounding buffer type concentration (values being determined)
- Test Facility and FA:
 - Tests will be conducted at CDI with the AREVA FA
 - Fiber load limit defined at CDI with the AREVA FA was lower than that defined at Westinghouse with the Westinghouse FA
 - Therefore, a favorable result from the CDI facility (AREVA FA) will be applicable and bounding of the Westinghouse FA

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – GSI-191 (LTCC)

Planned Activities:

Further (potential) FA Testing

- Goal: Demonstrate the suitability of test facilities
 - Test parameters will be defined

Schedule

- Finalize conservatism test parameters - March 2011
- Complete conservatisms testing - by April 29, 2011 (to incorporate regulator feedback)
- Submit report to NRC – by May 13, 2011
- Complete FA testing (conducted testing at both facilities if required) - by June 10, 2011
- Submit FA testing report (if required) - by July 29, 2011
- NOTE: Schedule may be adjusted to incorporate regulator feedback

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – GSI-191 (ZOI)

Issue Statement:

- Zone of Influence (ZOI) Jet Impingement Testing
 - PA-SEE-0639 was to address questions posed by the NRC on various Westinghouse WCAPs associated with jet impingement testing
 - Tests were to determine zone of influence (ZOI) and relative destruction pressures of the target materials
 - PA-SEE-0639 resolved five of seven issues that had been identified by NRC
 - New approved project (PA-SEE-0778) is to address remaining issues
 1. Scaling of test results to actual break and target sizes
 2. Use of the ANSI/ANS model to calculate ZOIs
 - Additional testing is scheduled for the first and second quarter of 2011

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – GSI-191 (ZOI)

Accomplishments to Date:

- NRC Public meeting 01/27/11 and follow-up conference calls
 - No issues that prevent project from moving forward

- Testing Plan has been developed
 - Design review for test facility modifications has been held
 - Test facility modification detailed design work in progress

- Meeting was held on 03/03/11 with NRC to discuss:
 - Jet impingement model
 - Program schedule

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Regulatory Issues – GSI-191 (ZOI)

Planned Activities:

Open Issues Being Addressed

- Scaling
 - Ongoing discussions with staff to resolve
 - Instrumented testing will verify pressure distributions

- Determination of ZOIs: Model being developed
 - To be benchmarked against current program test results and Marviken tests
 - Will provide more accurate prediction of radial pressure profiles to remove conservatisms
 - Will calculate ZOI values based on target test results

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Regulatory Issues – GSI-191 (Risk)

Risk-Informed / Risk-Based Approaches:

- Risk-Informed
 - 10 CFR 50.46a – new rule
 - Section 6 of NEI 04-07
- Risk-Based
 - STP (South Texas Project) initiative
- All three options are under review
 - 10 CFR 50.46a rule not issued; implementation guidance would be required to be developed
 - Industry is schedule to discuss new rule with the NRC Commissioners on March 24
 - Section 6 of NEI 04-07 being reviewed in light of latest developments
 - STP: Will support a generic industry approach

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Key Industry Topics – LB LOCA Redefinition

Issue Statement:

- Rule does not meet the purpose stated in SECY 98-0300:
 - Enhance safety by focusing NRC and licensee resources in areas commensurate with their importance to health and safety.
 - Provide NRC with the framework to use risk information to take action in reactor regulatory matters.
 - Allow use of risk information to provide flexibility in plant operation and design, which can result in burden reduction without compromising safety

- Rule is not likely to be adopted with its current requirements as explained in draft guidance

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March 2011 Executive Committee/NRC Meeting
Key Industry Topics – LB LOCA Redefinition

Accomplishment to Date:

- The PWROG has supported LBLOCA redefinition since 1998
 - Evaluated Potential Safety Benefits
 - Evaluated Potential Operational Benefits
 - Served on NRC Expert Panel
 - Worked With NRC to Change 10CFR50.46
 - PWROG has met many times with the NRC Staff, the ACRS and the Commission
 - PWROG has provided comments on several revisions to the draft rule, supporting NUREGs and Regulatory Guide

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – LB LOCA Redefinition

Challenges to Success:

- Implementation guidance is burdensome and still largely unknown
 - At least 3 new analyses
 - New change control program
 - New monitoring programs
 - New restrictions
 - Others yet to be identified
- New programs require more focus on non-risk-significant issues
 - Defeats part of the purpose of the rule
- Industry believes rule can be simplified

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Key Industry Topics – LB LOCA Redefinition

Planned Activities:

- NRC and industry should have open dialogue to define what the new “design basis” requirements need to be, in a very transparent way that the public can see and understand.
- Pilot applications await final rule and implementation guidance
- PWROG message to commission on March 24th will be for NRC staff to further develop the rule

PWR Owners Group
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Key Industry Topics – Gas Accumulation/Tech Spec Issue

Issue Statement:

- Generic Letter (GL) 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems”
 - Ensures gas accumulation is maintained less than the amount that challenges operability and action is taken

- The Traveler proposed to:
 - Expand the LCO Bases describing gas management as an important aspect of system Operability,
 - Add a Gas Management Program to the FSAR which describes the on-going aspects of gas management, and
 - Replace the existing SRs with the Gas Management Program requirements

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – Gas Accumulation/Tech Spec Issue

Accomplishment to Date:

- Placing the Gas Management Program in the FSAR provides durable guidance

- Industry / NRC meeting held on January 12, 2011
 - NRC plans to accept TSTF-523
 - Industry should receive NRC acceptance letter by the end of February, 2011

- Changes to the Gas Management Program would be evaluated under 10 CFR 50.59.
 - Provisions are appropriate to ensure an adequate review of any changes to the Gas Management program will be performed

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – Gas Accumulation/Tech Spec Issue

Planned Activities:

- NRC to provide industry with Traveler Acceptance Letter
- Continue dialog with NRC during TSTF Review Process

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – Gas Accumulation/Tech Spec Issue

Challenges to Success:

- Agreement on Regulatory Mechanism to capture the ongoing requirements of the Generic Letter (GL)

- NRC may request adding requirements to the Tech Spec (TS) Administrative Controls program that stated the minimum requirements for the licensee's program to manage entrained gas
 - Industry believes a TS Administrative Controls program is not appropriate for this application

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March 2011 Executive Committee/NRC Meeting
Key Industry Topics – Fire PRA Peer Review Schedule

Issue Statement

- Many plants are transitioning their fire protection programs to National Fire Protection Association (NFPA) 805 as the basis for their Fire Protection Program in accordance with the provisions of 10 CFR 50.48(c).
- Enforcement discretion was extended to last six months after the issuances of SEs for the pilot plants, Harris and Oconee.
- Harris had received their SE in 2010 and Oconee received theirs in December of 2010. The NRC granted enforcement discretion related to Appendix R until June of 2011.
- 10 plants/sites or more will not have a completed Fire PRA by this time frame

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March 2011 Executive Committee/NRC Meeting
Key Industry Topics – Fire PRA Peer Review Schedule

Recent Accomplishments:

- VC Summer Fire PRA Peer Review (8/2010) and follow-on completed (2/2011)
- OPPD Fire PRA Peer Review (9/2010)
- Waterford Fire PRA Peer Review (11/2010)
- Diablo Canyon Follow-on Fire PRA Peer Review (12/2010)
- Beaver Valley 1 Follow-on Fire PRA Peer Review (1/2011)

Success Related to completed Fire PRAs

- Excellent insights have been obtained for vulnerabilities to fire.
(Recognizing that the industry is still working to improve realism in Fire PRA.)

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Key Industry Topics – Fire PRA Peer Review Schedule

Planned Activities:

- Work with utilities to bring more certainty to the schedule and following Fire PRA Peer Reviews in 2011.
 - 7 Full Scope Fire PRA Peer Reviews
 - 1 Focused Scope Fire PRA Peer Review
- These are being coordinated with Internal Events Peer Reviews

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – Fire PRA Peer Review Schedule

Challenges to Success

- Plants are taking more time to complete their Fire PRAs due to increased scope of work found during analysis or methodology limitations that are encountered
 - Has resulted in a need to slip the schedule for their Fire PRA peer reviews
 - At this time, the NRC has indicated that they will only grant enforcement discretion until June 2011
 - Potentially ten plants/sites or more will not have a “complete” (ready for peer review) Fire PRA by that date.
 - Plants that do not meet the June 29, 2011 submittal date will have to address the resulting regulatory implications

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March 2011 Executive Committee/NRC Meeting
Key Industry Topics – Fire PRA Peer Review Schedule

Challenges to Success - *Continued*

- The time pressures have lead to utilities requesting a Fire PRA Peer Review before their Fire PRA is fully complete (not all higher CDF scenarios have had more detailed modeling)
 - Some utilities have been moving Peer Reviews into early 2011 due to June 2011 deadline for enforcement discretion, which suggests this trend may continue
 - The NEI PRA Peer Review Task Force has had detailed discussions and agreement with the NRC PRA staff on how partially incomplete portions should be graded and evaluated in peer reviews. (RMSC Chair and Westinghouse Technical Lead participated)

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – 10CFR50.46b

Issue Statement:

- NRC is in the process of revising the current ECCS acceptance criteria. The proposed changes will require all licensees to revise their licensing basis for LOCA analyses and will likely impose operational restrictions on a small subset of plants.

- The industry is responding to the proposed changes by performing an assessment of the performance of fuel cladding to the new proposed ECCS criteria based on the current analysis of record to determine existing safety margin and expected analytical methods improvements to access probable margin.

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Key Industry Topics – 10CFR50.46b

Accomplishment to Date:

- An industry project plan, coordinated with PWROG, BWROG, NEI and EPRI has been developed and presented to the NRC to develop information on current plant safety margins to the new proposed criteria.

- Required input has been developed and is being verified by the utilities.

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March 2011 Executive Committee/NRC Meeting
Key Industry Topics – 10CFR50.46b

Planned Activities:

- Following verification of required data, plants will be grouped according to a preselected set of criteria to determine existing margins or where “credits” will need to be accounted for to demonstrate safety margin.

- The PWROG will assist in the coordination and development of PWROG/Industry responses and the industry implementation plan to the NRCs Advanced Notice for Public Rulemaking.

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March 2011 Executive Committee/NRC Meeting
Key Industry Topics – 10CFR50.46b

Challenges to Success:

- The industry may require a method of “maintaining margin” on an interim basis in the coming years until through implementation of the new criteria and new LOCA methods and analyses for the entire industry is complete.
- Timing of new LOCA analyses will depend on the development of models to technically account for the new criteria in an acceptable manner and the identification of specific plants with the greater or lesser available margin.
- There is a lack of data available to compare to the proposed criteria potentially requiring code modifications to address the shortfall in data.
- The new rule change is anticipated in 2013. Demonstration of compliance with the new criteria is expected to take several years.

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Other Topics for Discussion

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Other Topics for Discussion

- Clinton TIA (TS SR 3.0.3 to IST)
- Status of PWROG long-term boron precipitation and core cooling projects
- Burnup-Dependent Fuel Thermal Conductivity and Fuel Performance Analytical Codes
- Revised Reactivity Initiated Accident (RIA) Criteria and Guidance
- Containment Accident Pressure guidance

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Other Topics for Discussion

- TSTF-513 and TSTF-514 - Expiration of Enforcement Discretion granted in EGM-09-001
- U.S. Integrated Regulatory Review Service (IRRS) Mission Report – Industry Initiatives and High Standards of Work Quality
- Managing Emerging Information During Review of Complex Licensing Actions

PWR Owners Group
March 2011 Executive Committee/NRC Meeting
Meeting Review

- **Future meeting dates**
 - Drop-in meeting (limited attendees)
 - Day before the RIC meeting March 2010

- **Review of Action Items**

- **Closing Remarks**

- **Adjourn**