June 5, 2013

MEMORANDUM TO:	Matthew A. Mitchell, Chief Projects Management Branch Japan Lessons-Learned Project Directorate Office of Nuclear Reactor Regulation
FROM:	Lisa M. Regner, Sr. Project Manager / RA/by EMiller for Projects Management Branch Japan Lessons-Learned Project Directorate Office of Nuclear Reactor Regulation
SUBJECT:	SUMMARY OF THE MAY 7, 2013, PUBLIC CONFERENCE CALL ON THE DELAYED INSPECTION ITEMS ASSOCIATED WITH JAPAN LESSONS LEARNED NEAR-TERM TASK FORCE RECOMMENDATION 2.3 SEISMIC WALKDOWNS

On May 7, 2013, the U.S. Nuclear Regulatory Commission (NRC or the staff) held a Category 2 public teleconference¹ to discuss NRC staff concerns regarding delayed inspection items as identified in seismic walkdown reports for a number of operating reactors. The seismic walkdown reports were submitted to the NRC for review as requested by the March 12, 2012, NRC request for information per Title 10 to the *Code of Federal Regulations*, Section 50.54(f) (the 50.54(f) letter). Enclosure 3 to the request for information letter includes Recommendation 2.3: Seismic Walkdowns. These seismic walkdowns were conducted by all operating reactor licensees and holders of construction permits using the staff-endorsed guidance, Electric Power and Research Institute Report 1025286, "Seismic Walkdown Guidance" (walkdown guidance).²

The staff conducted the public conference call to provide feedback to the licensees of specific plants who have notified the NRC that they plan to complete walkdown activities later than the next refueling outage. There were no presentations nor handouts used during the meeting. The meeting participants are provided in an enclosure.

The staff stated its expectation that walkdown activities should be completed as expeditiously as possible and by the next refueling outage, if possible. The staff requested further information to understand which walkdown items the licensees proposed to delay beyond the next refueling outage and the basis for the delay.

CONTACT: Lisa M. Regner, NRR/JLD 301-415-1906

¹ The meeting notice is available via the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML13119A542.

² The walkdown guidance is in ADAMS under Accession No. ML12188A031. The staff's endorsement letter of the guidance is in ADAMS under Accession No. ML12145A529.

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Industry responded that most of the delayed items are related to electrical cabinets which are not taken out of service during refueling outages (complete inspections are typically performed on de-energized cabinets). In some cases, external inspections of cabinets have been completed, including anchorage inspections, leaving only internal inspections to be completed.

The NRC staff clarified that the walkdown guidance states that items that required disassembly need not be included in the walkdown lists. The staff also noted that the guidance allows for substitution of replacement items in the event that a particular component could not be readily accessed or taken out of service for internal inspection.

The staff asked if other items, besides internal cabinet inspections, were delayed beyond the next scheduled refueling outage. Industry stated that there were other items, such as components inside containment. Industry raised additional questions concerning substitution of equipment on the seismic walkdown equipment lists (SWEL). Staff stated that there needs to be careful consideration of substitutions so that sample size, diversity, and the integrity of the guidance are compromised as little as possible.

The staff proposed that licensees voluntarily submit a supplemental letter to their walkdown reports identifying:

- the list of SWEL items that are not expected to be completed by the unit's next scheduled refueling outage,
- information on which aspects of the inspection activities on delayed SWEL items have been completed and which aspects remain (for example, external anchorage of cabinets may have been inspected, but internal inspection of the cabinets may remain),
- a proposal that includes substitute SWEL items or alternative approaches for those items for which walkdowns are not expected to be complete during the next refueling outage, and
- if a substitute SWEL item or alternative approach is proposed, explain how the revised SWEL continues to satisfy the objective of the walkdown guidance.

Industry requested further clarification regarding the level of detail the NRC staff would find acceptable for revisions or substitutions in the walkdown plans. Staff agreed that the Nuclear Energy Institute (NEI) staff and industry representatives needed time to discuss the proposal. Further discussions will take place in a public forum to be noticed later.

Members of the public participated in the conference call and asked questions during the public comment period at the end of the meeting. Questions included whether the walkdowns were Tier 1 activities, the impact of the delays on the seismic actions completion dates, and NRC's public meeting procedures.

There were no meeting feedback forms received.

Enclosure: Participant list

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DATE	6/5 /2013	6/5 /2013	6/5/2013	6/5/2013	6/5/2013

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Public Conference Call on the Delayed Inspection Items Associated with Japan Lessons Learned Near-Term Task Force Recommendation 2.3: Seismic Walkdowns

<u>May 7, 2013</u>

Participant List

Name:	Organization:
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Tom Bortolini John McIntyre Kathy Ann Baker Hal Dodd Ken Putnam John Traynor Guy Ford Eric Dimonche Mike Wegman Jon Kapitz Bill MacFarley Jeff Clark Kimberly Keithline Leon Rafner Ben Kosbab Sam Hobbs	Braidwood Station representative (Exelon) Brunswick Steam Electric Plant representative Clinton Power Station representative (Exelon) Dresden Nuclear Power Station representative (Exelon) Duane Arnold Energy Center representative R.E. Ginna Nuclear Power Plant representative LaSalle County Station representative (Exelon) Oyster Creek Nuclear Generating Station representative (Exelon) Peach Bottom Atomic Power Station representative (Exelon) Prairie Island Nuclear Generating Plant representative Three Mile Island representative (Exelon) Exelon Nuclear Energy Institute Certrec Corporation Enercon Services, Inc. Enercon Services, Inc.