

June 21, 2013

MEMORANDUM TO: Hossein G. Hamzehee, Chief
PRA Licensing Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Michael R. Snodderly, Senior Reliability and Risk Analyst */RA/*
PRA Licensing Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING ON INITIATIVE TO IMPROVE
NUCLEAR SAFETY AND REGULATORY EFFICIENCY

The U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public meeting on May 22, 2013. The purpose of the meeting was to discuss the Nuclear Energy Institute's (NEI's) draft comments and proposal on the Commission's proposed initiative to improve nuclear safety and regulatory efficiency by applying probabilistic risk assessments to determine the risk significance of current and emerging reactor issues in an integrated matter and on a plant-specific basis. Details on the initiative can be found in "Staff Requirements – COMGEA-12-0001/COMWDM-12-0002 – Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency," issued February 6, 2013, located in the Agencywide Documents Access Management Systems (ADAMS) Accession No. ML13037A541.

The meeting was held at the NRC headquarters in Rockville, Maryland, and was attended by 23 people. Seven participants attended the meeting in-person and the others participated remotely through a webinar with audio teleconferencing. The attendee list is provided as Enclosure 1. The notice and agenda for the meeting can be found in the ADAMS under Accession No. ML13122A116. There were no slides or handouts presented at the meeting.

Enclosures:

1. Attendee List
2. Summary of Discussion and Feedback

CONTACT: Michael R. Snodderly, NRR/DRA
301-415-2241

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DATE	06 / 20 / 2013	06 / 21 / 2013

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**List of Meeting Attendees
Public Meeting on Initiative to Improve Nuclear Safety
and Regulatory Efficiency
May 22, 2013**

Name	Affiliation
Biff Bradley	Nuclear Energy Institute (NEI)
*Michelle Carr	San Onofre
*Jim Chapman	Sciencetech Curtiss
*Leslie Collins	Westinghouse
*Barton Cowan	N/A
*Dan Cronin	University of Florida
*Steven Dolley	Platts
*Don Dube	ERIN Engineering
*Raymond Fine	First Energy
Joseph Giitter	U.S. Nuclear Regulatory Commission (NRC)
*R. Budd Haemer	American Electric Power
Hossein Hamzehee	NRC/NRR
Adrian Heymer	NEI
*Tom Houghton	Certrec Corporation
*John Lai	NRC/ACRS
*Stanley Levinson	AREVA
Geary Mizuno	NRC/OGC
*Parviz Moieni	San Onofre
*Larry Parker	STARS Alliance
*Jim Peschel	Certrec Corporation
*Suzanne Schroer	NRC/NRO
Michael Snodderly	NRC/NRR
Jason Zorn	NEI

* Participated via webinar or teleconference

**Summary of Feedback
Public Meeting on Initiative to Improve Nuclear Safety
and Regulatory Efficiency
May 22, 2013**

Key comments and questions received at the meeting from stakeholders are summarized below. The NRC staff will consider comments received at the public meeting and via www.regulations.gov in the development of the concepts for this initiative. The NRC staff will not be providing formal responses to comments and questions.

Comments from the Nuclear Energy Institute (NEI):

- NEI is on schedule to provide initial comments on the COMSECY by May 28, 2013. They plan to provide further comments in a white paper by June 30, 2013.
- NEI has formed a senior working group composed of chief nuclear office's to investigate the level of interest in the initiative. They believe there is general support for this initiative and the idea that resources should be focused on those matters that have greatest safety significance.
- NEI believes the generic prioritization process they are developing will assist in the assessment of the overall cumulative impact at a plant as discussed in SECY 12-0137. In response to a question from NRC staff, NEI stated that the generic prioritization process is intended to provide general risk insights and an indication of importance for the required regulatory action to NRC staff and plant management, as well as key considerations for plant specific consideration of the issue.
- NEI envisions the following timeline:
 - Assemble pilot plants and develop draft detailed implementing guidance beginning in August 2013 and completed by December 2013
 - Complete pilots and receive NRC endorsement of guidance by the end of 2014
- NEI stated that they agree that plant-specific risk insights can be used to improve safety by allowing plant activities to be scheduled according to safety impact.
- NEI does not believe there are sufficient resources at this time to support an initiative as described in the COMSECY.
- NEI stated that the June 30th white paper will consider the Integrated Safety Assessment Process (ISAP), 10 CFR 50.69, "Risk-Informed Characterization and Treatment of Structures, Systems and Components," 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance," Regulatory Analysis Guidelines, and the Reactor Oversight Process among others.
- In response to a question from the NRC staff, NEI stated that questions similar to those used in support of 10 CFR 50.69 will be used to address defense in depth.
- NEI stated that the fully vetted set of questions to support the prioritization initiative would be provided in the June 30th white paper.
- NEI stated that the process would be focused on identifying, categorizing and prioritizing activities based on their safety benefit and would not use a go-no-go approach with risk acceptance criteria.
- In response to a question from the NRC staff, NEI stated that this process would not impact the risk acceptance criteria associated with the Commission's Safety Goals.

ENCLOSURE 2

- NEI stated that the PRA standards have risen greatly since the advent of Regulatory Guide 1.200 and that industry is being driven to higher PRA standards as a result of implementing NFPA 805 and responding to Fukushima action items.
- The NRC staff and NEI discussed some of the potential challenges in implementing a prioritization process, such as, how would disagreements between the NRC staff and the licensee be resolved. It was agreed, that tabletop exercises would help to investigate such concerns.
- The NRC staff mentioned the Commission's phased approach to PRA quality and that the NRC staff believes it is in Phase 3 and that Phase 4, review and approval of a plant-specific PRA, required Commission notification.
- Steven Dolley of Platts asked when the NRC staff planned to provide initial thinking and the NRC staff stated no later than the first week of July 2013.
- Mr. Dolley asked if the process was approved by an order then how would the dynamic nature of considering new information be considered. The NRC staff stated that new information that results in regulatory action would have to include whether the action could be addressed by an existing integrated scheduling process or whether it needed to be implemented by a certain date.
- The NRC staff stated that they looked forward to the forthcoming comments.