

July 15, 2013

MEMORANDUM TO: Timothy J. Kobetz, Chief
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Aron Lewin, Reactor Operations Engineer **/RA/**
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: MEETING BETWEEN THE NUCLEAR REGULATORY
COMMISSION STAFF AND STAKEHOLDERS CONCERNING
THE EVENT REPORTING OF SYSTEM ACTUATIONS.

On June 26, 2013, the Nuclear Regulatory Commission (NRC) staff met with members of the Nuclear Energy Institute (NEI), as well as with other members of industry, to solicit comments on identified issues associated with the event reporting of system actuations.

A public meeting notice was issued on June 4, 2013, and was posted on the NRC's external (public) web page (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13154A305).

Enclosure (1) lists the meeting attendees. Enclosure (2) contains the meeting summary.

Enclosures
(1) Meeting Attendee List
(2) Meeting Summary

CONTACT: Aron Lewin, IRIB/DIRS
301-415-2259

July 15, 2013

MEMORANDUM TO: Timothy J. Kobetz, Chief
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Aron Lewin, Reactor Operations Engineer **/RA/**
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: MEETING BETWEEN THE NUCLEAR REGULATORY
COMMISSION STAFF AND STAKEHOLDERS CONCERNING
THE EVENT REPORTING OF SYSTEM ACTUATIONS.

On June 26, 2013, the Nuclear Regulatory Commission (NRC) staff met with members of the Nuclear Energy Institute (NEI), as well as with other members of industry, to solicit comments on identified issues associated with the event reporting of system actuations.

A public meeting notice was issued on June 4, 2013, and was posted on the NRC's external (public) web page (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13154A305).

Enclosure (1) lists the meeting attendees. Enclosure (2) contains the meeting summary.

Enclosures
(1) Meeting Attendees List
(2) Meeting Summary

CONTACT: Aron Lewin, IRIB/DIRS
301-415-2259

DISTRIBUTION:
IRIB R/F
RidsNrrDirslrib

ADAMS ACCESSION NUMBER: ML13182A334

OFFICE	IRIB/DIRS	BC:IRIB/DIRS
NAME	ALewin	TKobetz
DATE	7/ /2013	7/ /2013

OFFICIAL RECORD COPY

MEETING ATTENDEE LIST

Name	Organization	E-Mail Address
Brian Thomas	PSEG Nuclear	brian.thomas@pseg.com
Laurie Lahti	Certrec	laurie.lahti@certrec.com
Tom Loomis	Exelon	thomas.loomis@exeloncorp.com
Larry Parker	STARS Alliance	larry.parker@starsalliance.com
Cindy Williams	FENOC	cawilliams@firstenergycorp.com
Tracy Honeycutt	SNC	tdhoneyc@southernco.com
Lenny Suepev	Xcel Energy	lenny.suepev@xenuclear.com
Robin Ritzman	First Energy	rritzman@firstenergycorp.com
Tim Hope	Luminant Power	timothy.hope@luminant.com
Tony Zimmerman	Duke Energy	Tony.zimmerman@duke-energy.com
David Mannai	Entergy Nuclear	dmannai@entergy.com
James Slider	NEI	jes@nei.org
Aron Lewin	NRC	Aron.Lewin@nrc.gov

MEETING SUMMARY

- The NRC solicited comments on identified issues associated with the event reporting of system actuations. The NRC indicated that a future meeting will be held to discuss resolution of the issues and, if needed, ways in which the resolution can be communicated to stakeholders. The identified issues and solicited comments are as follows:

1. Is a system considered to actuate if the only components to change state are those channels enough to complete the minimum actuation logic?

Comments Received: Stakeholders indicated that a system is considered to actuate even if the only components to change state are those channels enough to complete the minimum actuation logic. The minimum actuation logic is that associated with at least a train that correlates to the system's intended function. There are no exceptions for the reporting of valid actuations, but there may be exceptions to reporting for invalid actuations.

2. There is an additional discussion found only in NUREG-1022 that indicates a system is considered to actuate if enough components actuate to carry out the system's function (typically at least a train). Is the intent of this discussion to emphasize the original FRN discussion that single channels actuations, pump starts, other component manipulations, etc., are not reportable if the minimum actuation logic for a train is not met? If not, could this discussion be in conflict with the Background discussion found in Question 1 above?

Comments Received: Stakeholders reiterated the answer to question #1 above. Stakeholders also emphasized that the minimum actuation logic is that associated with at least a train that correlates to the system's intended function.

3. Is it considered an actuation if enough channels complete the minimum actuation logic but are only functions associated with continued system operation or protection (e.g. storage water tank swap or system isolation)?

Comments Received: Stakeholders reiterated the answer to questions #1 and #2 above. If the minimum actuation logic is not associated with at least a train that correlates to the system's intended function, the event would not be considered an actuation.

4. Are system classification (i.e. safety-related / non-safety related) or plant status (i.e. operating in a Mode in which system may not be needed) considerations in determining if an "actuation" occurred or in determining the classification of the actuation (i.e. valid vs. invalid)?

Comments Received: Stakeholders indicated that plant status (i.e. operating in a Mode in which system may not be needed) is not taken into account in determining if an "actuation" occurred or in determining the classification of the actuation (i.e. valid vs. invalid). However, plant status may result in meeting one of the reporting exceptions for invalid actuations.

Stakeholders indicated that system classification (i.e. safety-related / non-safety related) is a consideration in determining if an "actuation" occurred. Stakeholders indicated that systems

within scope of system actuation reporting include only systems credited in the accident analysis chapter of the Final Safety Analysis Report (FSAR). If a system listed under the rule is not credited in the accident analysis chapter of the FSAR, its actuation would not be reportable.

5. Is a signal's classification (i.e. credited in FSAR / non-credited in FSAR) consideration in determining if an "actuation" occurred or in determining the classification of the actuation (i.e. valid vs. invalid)? For example, can a non-credited signal still result in a valid actuation of a safety-related system?

Comments Received: Stakeholders indicated that a signal's classification (i.e. credited in FSAR / non-credited in FSAR) is considered in determining if an "actuation" occurred. Actuation of a safety-related system due to a non-credited signal would not be reportable.

6. Is a report required for a "System Actuation" if an actuation should occur due to unplanned actual plant conditions, but fails to do so?

Comments Received: Stakeholders indicated that a "System Actuation" report is required if an actuation should occur due to unplanned actual plant conditions, but fails to do so. Stakeholders indicated that other reporting criteria may also apply.

7. Is actual performance of a system's function (i.e. ECCS discharge, EDG output breaker closing, etc.) a consideration in determining if an "actuation" occurred or in determining the classification of the actuation (i.e. valid vs. invalid)?

Comments Received: Stakeholders indicated that actual performance of a system's function (i.e. ECCS discharge, EDG output breaker closing, etc.) is not a consideration in determining if an "actuation" occurred or in determining the classification of the actuation (i.e. valid vs. invalid).

8. If an actuation occurs, is the only justification as to why an actuation is invalid, is that it is not considered valid? In other words, are there additional considerations for determining if an invalid actuation exists?

Comments Received: Multiple comments were received. Some comments indicated that a licensee's procedure will have criteria that indicate whether the actuation was valid or invalid. Stakeholders reiterated that valid actuations are those that start from actual plant conditions or parameters that complete the actuation logic requirements, and is either at the train level or has sufficient components to mitigate the consequences of the significant event. At least one commenter indicated that if an actuation occurs, the only justification as to why an actuation is invalid is that it is not considered valid.

9. What constitutes a “mitigation of the consequences of an event” with regards to System Actuation reporting?

Comments Received: Stakeholders indicated that the phrase reflects that systems within scope of system actuation reporting include only systems credited in the accident analysis chapter of the FSAR. If a system listed under the rule is not credited in the accident analysis chapter of the FSAR, its actuation would not be reportable. However, plant status (i.e. operating in a Mode in which system may not be needed) or actual performance of a system’s function (i.e. ECCS discharge, EDG output breaker closing, etc.) are not taken into account. Stakeholders also indicated that invalid actuations of such systems are considered events.