

August 7, 2013

MEMORANDUM TO: R. W. Borchardt
Executive Director for Operations

FROM: K. Steven West, Chairman **/RA/**
Committee to Review Generic Requirements

SUBJECT: COMMITTEE TO REVIEW GENERIC REQUIREMENTS:
MINUTES OF MEETING NUMBER 434

On July 8, 2013, the Committee to Review Generic Requirements (CRGR) held Meeting Number 434 with the staff to discuss a proposed revision of Regulatory Issue Summary (RIS) 2012-08, "Developing Inservice Testing and Inspection Programs Under 10 CFR Part 52," July 16, 2012 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML12114A010). The list of meeting attendees is enclosed.

This meeting was held at the request of the CRGR after its informal review of the proposed revision to the RIS (ADAMS Accession No. ML13122A365) to resolve the CRGR questions about the RIS that are noted below. Steven Downey, with the support of David Terao—both from the Office of New Reactors—briefed the CRGR on the background of RIS 2012-08 and its reasons for proposing a revision to the RIS, and addressed the CRGR's questions. The staff's slide presentation is located in ADAMS Accession No. ML13189A303.

The staff had issued RIS 2012-08 to describe acceptable approaches for applicants and combined license (COL) holders (licensees) to comply with the requirements in 10 CFR 50.55a, "Codes and Standards," regarding the development of inservice inspection (ISI) and inservice testing (IST) programs during the initial 120-month program interval following plant startup. The RIS also discusses acceptable approaches for developing preservice inspection programs and risk-informed ISI and IST programs. After noting a subtle difference in requirements during its review of an alternative request from Vogtle, the staff proposed the revision to update one of its recommendations in the original RIS and replace it with a more practical regulatory approach.

Although the CRGR found the proposed revision acceptable, it did raise questions about two aspects of the original RIS. First, the CRGR noted a lack of context for the references to generic safety issues and operating experience as well as an apparent contradiction in logic associated with the consideration of certain operating experience. Second, the CRGR questioned whether it was appropriate for the staff to recommend that a COL applicant or holder first develop a conventional ISI or IST program before it prepares a risk-informed ISI or IST program.

With respect to its questions about the consideration of generic issues and operating experience, the CRGR had a discussion with the staff and suggested that the staff remove from the RIS the reference to NUREG-0933, "A Prioritization of Generic Safety Issues," because it did not support the staff's intent. Furthermore, the CRGR suggested that the staff clarify the RIS to ensure that licensees capture and address the appropriate operating experience when evaluating alternatives to the requirements of 10 CFR 50.55a. The staff agreed with the CRGR's

suggestions and committed to provide a revision of its update to RIS 2012-08 to the CRGR for its review.

With respect to the CRGR questions about the staff's position (i.e., recommendation) on risk-informed ISI and IST programs, the CRGR noted that RIS 2012-08 stated that the "NRC staff recommends that a conventional ISI or IST program be in place or developed before preparing a risk-informed ISI or IST program to facilitate the [staff's] evaluation of the acceptability of the alternative program, particularly for those new- and advanced-reactor designs for which no plant-specific component performance data exist." The CRGR also noted that the regulations allow risk-informed programs but do not require the development of conventional programs as a prerequisite. The CRGR questioned if the staff's recommendation and its supporting statements included in the RIS could inadvertently impose a new requirement and additional burden on the applicants and licensees to voluntarily develop a conventional ISI or IST program largely to facilitate the staff's review of an alternative risk-informed ISI or IST program. The CRGR proposed that the staff remove its recommendation and shift its focus from the potential difficulties of a staff review of a proposed alternative risk-informed program to the steps an applicant or licensee would need to follow to develop such a program. The CRGR and the staff explored several ways to do this and, after discussion, the staff agreed to incorporate the CRGR proposal and provide a revision to the RIS for CRGR review.

On July 9, 2013, the staff provided the CRGR with a revised version of its proposed Revision 1 to RIS 2012-08. The CRGR reviewed the newly proposed revision and concluded that the staff made the changes that were agreed to during CRGR Meeting 434. The CRGR did not have any backfit or issue finality concerns and supported issuing the proposed Revision 1 to RIS 2012-08.

On July 10, 2013, the CRGR informed the staff of the results of its review. This memorandum constitutes formal CRGR endorsement of the proposed Revision 1 to RIS 2012-08, "Developing Inservice Testing and Inspection Programs Under 10 CFR Part 52."

Enclosure:
CRGR Meeting No. 434
List of Attendees

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ADAMS Accession No.: ML13190A400

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CRGR MEETING No. 434
LIST OF ATTENDEES
(July 8, 2013)

CRGR Members

K. Steven West, Chairman
Marc L. Dapas, NSIR
Daniel H. Dorman, NRR
Scott W. Moore, NMSS
Gary M. Holahan, NRO
Brian E. Holian, FSME
James P. Biggins, OGC
David C. Lew, RI

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Keith Hoffman, NRR/DE/EPNB
John G. Billerbeck, NRR/DE/EPNB
John C. Tsao, NRR/DE/EPNB

Enclosure