

July 17, 2013

MEMORANDUM TO: Rani L. Franovich, Chief
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Luis Cruz, Reactor Operations Engineer **/RA KRoche Acting For/**
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING
GROUP PUBLIC MEETING HELD ON JUNE 26, 2013

On June 26, 2013, the U.S. Nuclear Regulatory Commission (NRC) staff hosted the Reactor Oversight Process (ROP) Working Group (WG) public meeting with the Nuclear Energy Institute (NEI) ROP Task Force and other industry representatives. Enclosure 1 contains the meeting attendance list; Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13203A258) contains the white papers and presentations discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML13203A263) contains the Frequently Asked Questions (FAQ) Log and the three FAQs discussed during the meeting; and Enclosure 4 (ADAMS Accession No. ML13203A266) contains an ROP WG action items log. Meeting attendees discussed topics related to probabilistic risk assessment (PRA) operational support, assessment, security, and performance indicators (PIs).

The PRA Operational Support Branch (APOB) informed the participants about a public meeting held on May 13, 2013, to discuss the revision to Volume 1 of the Risk Assessment Standardization Project (RASP) Handbook (ADAMS Accession No. ML13030A049). The staff indicated that the meeting discussion mostly focused in three areas: methods used to assess significance of performance deficiencies associated with initiating events, modeling of common cause failures, and human reliability analysis. The staff informed that participants that it will be addressing these and other public comments as articulated in the meeting summary (ADAMS Accession No. ML13175A210)

The Operating Experience Branch (IOEB) did not discuss operating experience topics during this public meeting.

The Reactor Inspection Branch (IRIB) staff discussed changes being made to Inspection Manual Chapter (IMC) 2515, Light-Water Reactor Inspection Program - Operations Phase, to clarify when an Action Matrix deviation is appropriate based on the amount of resources required to follow-up on a technical issue. IRIB staff reiterated that NUREG-1022, Revision 3, "Event Reporting Guidelines: 10 CFR 50.72 and 50.73," (ADAMS Accession No. ML13122A036) was scheduled to go into effect on July 1, 2013. IRIB staff also discussed on-going efforts to resolve

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issues associated with the event reporting of system actuations and loss of emergency preparedness capabilities.

IRIB staff also informed participants about a public meeting on the effectiveness of the ROP baseline inspection program to be held on July 17, 2013. The goal of this meeting was to have a dialogue with external stakeholders on identified baseline inspection program topics, and obtain public comments on the baseline inspection program. The staff issued a Federal Register Notice (Federal Register Citation 78 FR 35056) on June 11, 2013, to notify the public about this meeting and to identify topics on which the staff requested public comments.

The Performance Assessment Branch (IPAB) staff informed meeting participants that the draft Commission paper on "Recommendations for Risk-Informing the Reactor Oversight Process for New Reactors" was forwarded to the Advisory Committee on Reactor Safeguards (ACRS) on June 24, 2013 (ADAMS Accession No. ML13169A408), and will be made publicly available. The staff plans to meet with the ACRS on July 22, 2013, to discuss the draft paper, and the industry will have an opportunity to present its views as well. The staff plans to hold a separate public meeting to solicit feedback on the draft paper, and will revise it based on ACRS and other stakeholder comments prior to sending it to the Commission in October 2013.

IPAB staff also discussed the status of the initiative on implementing safety culture common language into ROP guidance documents. The staff introduced Allyce Bolger, who is on rotation to IPAB from NRC's Region I office, and noted that she will be supporting IPAB staff on this task. The staff plans to start with the components and aspects currently defined in IMC 0310, "Components Within The Cross-Cutting Areas," but will also consider changes to other related documents, such as IMC 0612, "Power Reactor Inspection Reports," IMC 0305, "Operating Reactor Assessment Program," and the supplemental inspection procedures. Staff noted that this next step should not impact the structure of applying cross-cutting aspects (CCAs) to inspection findings or the evaluation of the aspects in the determination of potential substantive cross-cutting issues (SCCIs). Industry representatives requested the staff to make the revised guidance documents available for public comment before issuing it. Staff noted that the ongoing ROP enhancement efforts and independent assessment results may have an impact on the structure or process for applying CCAs and indentifying SCCIs.

The staff also informed meeting participants about the assessment component of ROP enhancement effort. The staff plans to evaluate various areas within the scope of the Assessment Program, including supplemental inspection timeliness and long-standing SCCIs. The staff plans to incorporate insights from the current ROP independent assessment as part of this evaluation. The staff will provide opportunities for public engagement through this process.

In the area of the PI program, staff and industry addressed the following items (Enclosure 2):

- (1) The staff indicated that Perry 1 submitted a change notice to revise their PI data for the third quarter of 2012. The Occupational Exposure Control Effectiveness PI transitioned from White to Yellow.
- (2) The staff informed meeting participants that Kewaunee submitted its

10 CFR 50.82(a)(1)(i) and 10 CFR 50.82(a)(1)(ii) letters to the NRC as part of the decommissioning process for this reactor. The NRC informed industry that the next update of the PI public website will reflect the removal of Crystal River 3, Kewaunee, and San Onofre 2 & 3 from the ROP PI program.

- (3) Industry representatives and NRC staff discussed a white paper clarifying the definition of additional failures for the Safety Systems Functional Failures PI. The NRC staff did not approve the addition of a sentence on considerations for old design issues. The NRC staff will provide additional language for this white paper during the next meeting.
- (4) The NRC staff discussed a white paper regarding the objective of the reactor coolant system (RCS) leakage PI. The RCS leakage PI does not monitor the attributes of the technical basis for the PI described in IMC 0308 Attachment 1, Technical Basis for Performance Indicators. The staff presented various options for resolving the discrepancy outlined in the white paper. Industry will provide a response documenting potential challenges and recommendations going forward on the resolution of this issue.
- (5) Industry representatives discussed a white paper titled "DEP and Participation Credit for Non-active SRO." The white paper intends to clarify the criteria in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," for participation credit for a single person filling multiple key positions in the Drill/Exercise Performance and Emergency Response Organization Drill Participation PIs.
- (6) Industry representatives and NRC staff discussed a white paper on the PRA technical adequacy for MSPI. Industry representatives incorporated recommended changes to the white paper and in Revision 7 of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline." The staff will provide comments on the white paper during the next meeting.
- (7) Industry representatives indicated that industry will be holding a seminar on MSPI during July 29-31, 2013, in Minneapolis, MN. NRC staff will provide a presentation on MSPI during the workshop.

Staff and industry discussed the following PI FAQs (see Enclosure 3):

- FAQ 13-01: This FAQ is final. This was a site-specific FAQ for Turkey Point 3. This FAQ addressed the scrams and operating hours counted under the Unplanned Scrams per 7,000 Critical Hours PI. The staff evaluated the number of operating hours for the unit and concluded that an exemption would not be granted since operation of less than 7,000 critical hours is not considered a unique condition.
- FAQ 13-02: This FAQ was introduced. This is a site-specific FAQ for Susquehanna. This FAQ addresses an unplanned rapid power reduction that occurred during a planned power reduction at Susquehanna 1 on June 11, 2012.

The next ROP working group public meeting will be held on August 7, 2013.

Enclosures:

1. Attendance List – June 26, 2013
2. White papers and presentations discussed during the June 26 2013 ROP WG public meeting:
 - a. Effectiveness of the ROP Baseline Inspection Program public meeting presentation
 - b. White paper on “Additional Failures” for MS05
 - c. White paper on “Objective of the RCS Leakage PI”
 - d. White paper on “DEP and Participation Credit for Non-active SRO (Generic)”
 - e. White paper on “PRA Technical Adequacy for MSPI”
3. Reactor Oversight Process Task Force FAQ Log
4. ROP Working Group Action Items Tracking Log – June 26, 2013

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ADAMS ACCESSION NO: ML13203A250; **Package No:** ML13203A239; *Concurred via e-mail

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|---------------|-------------------|--------------------------|----------------------|------------------------|
| OFFICE | NRR/DIRS/IP AB | BC:NRR/DRA/APO B | BC: NRR/DIRS/IRIB | BC:NRR/DIRS/IP AB |
| NAME | LCruz/ RA/ | SWeerakkody*/ RA/ | TKobetz*/ RA/ | RFranovich /RA/ |
| DATE | 7/17/13 | 7/19/13 | 7/23/13 | 7/25/13 |

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REACTOR OVERSIGHT PROCESS PUBLIC MEETING
REACTOR OVERSIGHT PROCESS
PUBLIC MEETING
ATTENDANCE LIST
June 26, 2013

| | |
|-------------------|----------------|
| Luis Cruz | NRC |
| Ronald Frahm | NRC |
| Michael Balazik | NRC |
| Rani Franovich | NRC |
| Kevin Roche | NRC |
| Allyce Bolger | NRC |
| Ray Powell | NRC |
| Tim Kobetz | NRC |
| Undine Shoop | NRC |
| Marsha Gamberoni* | NRC |
| Aron Lewin | NRC |
| Chris Reagan | NRC |
| Sunil Weerakkody | NRC |
| Carl Grigsby | NRC |
| Eric Schrader | NRC |
| Bruce Mrowca | ISL |
| Jim Slider | NEI |
| Chris Earls | NEI |
| Jana Bergman | Scientech |
| Robin Ritzman | FirstEnergy |
| Ken Heffner | Certrec |
| Lenny Sueper | Xcel Energy |
| Tony Zimmerman | Duke Energy |
| Larry Parker | STARS Alliance |
| Christine Neely | PSEG Nuclear |
| Cindy Williams | FENOC |
| Tracy Honeycutt | SNC |
| Elijah Holsenbeck | SNC |
| Bob Walpole | Entergy |
| Larry Naron | CENG |
| Garry Miller | Dominion |
| Ron Gaston* | Exelon |
| Roy Linthicum* | Exelon |

*participated via teleconference and/or online meeting