

August 14, 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/**
Projects Management Branch
Japan Lessons-Learned Project Directorate
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE AUGUST 1, 2013, PUBLIC CONFERENCE
CALL ON THE DELAYED INSPECTION ITEMS ASSOCIATED WITH
JAPAN LESSONS LEARNED NEAR-TERM TASK FORCE
RECOMMENDATION 2.3 SEISMIC WALKDOWNS

On August 1, 2013, the U.S. Nuclear Regulatory Commission (NRC or the staff) held a Category 2 public teleconference¹ to continue discussions regarding delayed walkdown items 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) (50.54(f) letter). Enclosure 3 to the 50.54(f) 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 (EPRI) Report 1025286, "Seismic Walkdown Guidance" (walkdown guidance).²

The NRC staff previously held a public conference call on May 7, 2013,³ to initiate discussions on the walkdowns of delayed items that would go beyond the next refueling outage for specific plants. The August 1, 2013 public conference call was initiated by NRC staff to reiterate the request for voluntary supplemental letters with commitments to complete the remaining seismic walkdowns as expeditiously as possible. Also, the NRC staff answered questions and clarified the acceptable substitutions and alternatives for seismic walkdown items. There were no presentations or handouts used during the meeting. The meeting participants are provided in an enclosure.

During the call, the NRC staff restated its expectation that walkdown activities be completed as expeditiously as possible, with all planned walkdowns to be completed by a licensee's next refueling outage. The staff requested that licensees evaluate what changes may be made to complete, substitute for, or justify not needing to complete the walkdowns for delayed walkdown

¹ The meeting notice is available via the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML13204A020.

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

³ The meeting summary is available in ADAMS under Accession No. ML13136A003.

items. The staff requested that licensees submit by September 16, 2013, supplementary information regarding how they propose to address their delayed walkdown items to allow the NRC staff to evaluate and include this information in the walkdown report safety assessments (planned for issuance by the end of November 2013). The NRC staff requested that the licensees' supplementary information also acknowledge a submittal date for the licensees' final seismic walkdown reports of no later than 90 days after their next refueling outage is complete (breaker closure).

The NRC staff stated that fleet-wide submittals (e.g., for Exelon plants) are acceptable, but stressed that plant-specific and stand-alone information must be included for each plant in the fleet that discusses the status of the walkdown of any delayed items, the plan for completion, and justification for any alternate approaches to full completion that are proposed. The NRC staff also stressed that they are not requesting an updated walkdown report be submitted along with the letter.

Several plants stated that they had accelerated their delayed walkdowns and were able, in some cases, to substitute alternative equipment to the walkdowns inspections by the end of 2014. Industry reiterated that most of the delayed items involved internal inspections of electrical cabinets (internal inspections are typically performed on de-energized cabinets).

Clarification questions asked concerned: whether substitutions could be made across a multi-unit site, whether the voluntary letters requested by September 16, 2013, needed to contain regulatory commitments and how to reflect component substitutions in the final report. The staff's responses to these questions have been incorporated into the path forward summary below.

The meeting concluded with a summary of the path forward reached during the call:

- By September 16, 2013, the NRC staff expects to receive voluntary letters which describe the path forward for completing walkdown activities at each plant with delayed items. The letters will:
 - Describe the current status of the delayed items identified in the licensee's November 2012 walkdown report.
 - Provide the schedule for the walkdown of remaining items, indicating if the item does, or does not, require an outage to complete the walkdown.
 - Identify any plans for substitute items. The NRC staff noted that licensees cannot make substitutions between units at multi-unit sites. If substitutes are planned, the letter will include justification for why these substitutes are acceptable and how the intent of the walkdown guidance is still met.
 - Identify any items for which walkdowns will not be completed by the end of the next outage. If the licensee's proposal indicates that the walkdown of an item will not be completed by this time, the letter will include the reason the walkdown of the item cannot be completed, a justification for why this is acceptable and how the intent of the walkdown guidance will still be met when the licensee's final walkdown report is submitted.

- Characterize the completion of walkdowns, on the schedule provided, as a regulatory commitment. The NRC staff noted that regulatory commitments are needed to specify which structures, systems and components will be walked down, the date for completion of the overall walkdown activities and the date for the final report.
- The inspection of the remaining non-outage walkdown items committed to in the voluntary letter will be completed prior to the next refueling outage.
- The remaining items identified in the voluntary letter as requiring a refueling outage to be walked down will be completed in the next scheduled refueling outage.
- Ninety days after the end of the next scheduled refueling outage (by date of breaker closure), each plant will provide a final seismic walkdown report to document the completion of the walkdown. Any areas where the completed work deviates, either by substitution or exclusion, from the plan outlined in the licensee's letter of (or before) September 16, 2013, will be identified and supported by justification and explanations for how the intent of the walkdown guidance was still met. Substitutions need to be identified, the basis for the substitution discussed, and the item substitutions reflected in the tables with the walkdown results.

There were no questions from the public and no meeting feedback forms received.

Enclosure:

Participant list

- Characterize the completion of walkdowns, on the schedule provided, as a regulatory commitment. The NRC staff noted that regulatory commitments are needed to specify which structures, systems and components will be walked down, the date for completion of the overall walkdown activities and the date for the final report.
- The inspection of the remaining non-outage walkdown items committed to in the voluntary letter will be completed prior to the next refueling outage.
- The remaining items identified in the voluntary letter as requiring a refueling outage to be walked down will be completed in the next scheduled refueling outage.
- Ninety days after the end of the next scheduled refueling outage (by date of breaker closure), each plant will provide a final seismic walkdown report to document the completion of the walkdown. Any areas where the completed work deviates, either by substitution or exclusion, from the plan outlined in the licensee’s letter of (or before) September 16, 2013, will be identified and supported by justification and explanations for how the intent of the walkdown guidance was still met. Substitutions need to be identified, the basis for the substitution discussed, and the item substitutions reflected in the tables with the walkdown results.

There were no questions from the public and no meeting feedback forms received.

Enclosure:

Participant list

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*Concurrence via e-mail

OFFICE	NRR/JLD/PMB/PM	NRR/JLD/LA*	NRR/JLD/PMB/BC	NRR/JLD/PMB/PM
NAME	LRegner (MFlanagan for)	SLent	MMitchell	LRegner (MFlanagan for)
DATE	8/7/2013	8/6/2013	8/13/2013	8/14/2013

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