

September 5, 2013

MEMORANDUM TO: Matthew A. Mitchell, Chief  
Projects Management Branch  
Japan Lessons-Learned Project Directorate  
Office of Nuclear Reactor Regulation

FROM: Lisa M. Regner, Senior Project Manager **/RA/**  
Projects Management Branch  
Japan Lessons-Learned Project Directorate  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE AUGUST 15, 2013, PUBLIC MEETING TO  
DISCUSS IMPLEMENTATION OF JAPAN LESSONS-LEARNED  
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, SEISMIC  
WALKDOWNS

On August 15, 2013, the U.S. Nuclear Regulatory Commission (NRC or the staff) held a Category 2 public meeting<sup>1</sup> with representatives from the Nuclear Energy Institute (NEI), the Electric Power Research Institute (EPRI) and a number of licensee facilities to discuss the status of the ongoing NRC staff seismic walkdown report reviews and summarize general observations from NRC's seismic walkdown audits. 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) (hereafter called the 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, EPRI Report 1025286, "Seismic Walkdown Guidance" (walkdown guidance).<sup>2</sup>

The staff presented their observations (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13231A156) from the five seismic walkdown audits that have been completed to date. The presentation also addressed staff expectations, based upon NRC-endorsed guidance, regarding how the walkdowns were to be completed. The NRC staff noted that some walkdown reports lacked the information necessary to understand if the walkdowns were conducted consistent with the endorsed guidance. Some walkdown reports also lacked discussion of the outcome of the walkdowns, as requested in the guidance.

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<sup>1</sup> The meeting notice is available in ADAMS under Accession No. ML13204A038.

<sup>2</sup> 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.

The staff identified in some audited reports that the outcomes (i.e., the reporting of potentially adverse seismic conditions on the walkdown checklists by the seismic walkdown engineers in the field) were not consistent with the endorsed guidance. Additionally, in some cases, the subsequent actions to address the potentially adverse seismic conditions were not reported consistent with the licensing basis evaluations (LBE) in the endorsed guidance. In some cases, the subsequent actions did not specifically address consistency with the seismic licensing basis. The staff found that most audited plants made efforts to address potentially adverse seismic conditions found in the walkdowns, but these efforts were not described in the walkdown report.

In other words, the staff believes that most of the actual walkdowns were conducted in a manner which is in line with the staff expectations, however in some cases the outcomes were not reported in the licensees' submittals, and in some cases, the reporting of the subsequent efforts (i.e., the licensing basis evaluations) was not included in the licensees' submittals. The staff explained that the lack of information impacts the ability of the staff to complete assessments regarding the licensees' seismic Walkdown Reports. The staff proposed to work with industry representatives to obtain this information. However, the staff also noted that the missing information could be provided in additional (or updated) submittals by the licensees such that the NRC staff could complete their assessments.

During the staff's presentation, a number of questions were asked by industry participants. The staff presentation stated that the LBE process as described in the EPRI guidance was not followed and/or results were not reported. NEI asked if the statement meant that during the audits, the staff had a concern with the conclusions reached during LBEs. The staff clarified that the objective of the staff's review of the walkdown reports and audits was to assess if the walkdown guidance was followed as a means to assure that the objectives of the 50.54(f) letter were met and not to evaluate the conclusions reached in LBEs. However, staff noted that the lack of reporting of the LBEs, or lack of walkdown outcomes, meant that NRC staff did not have an opportunity to review the basis for the determinations.

Another question asked by an industry participant was related to the staff's comments on LBEs. The industry participant noted that the findings of Temporary Instruction (TI) 2515/188, *Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns*,<sup>3</sup> for their plant were that the walkdown had been conducted in accordance with the walkdown guidance. The industry participant asked how this was being considered in the staff's request for additional information and why the discussion at this meeting seemed to suggest a different conclusion. The staff clarified that the scope of TI-2515/188 and the scope of the staff's review of the Walkdown Report were different. For example, the TI did not include the NRC staff review of the procedures related to identification of potential adverse conditions, nor did it include review of the Walkdown Reports, which were completed by licensees later than the inspections.

The staff stated in their presentation, that there were questions about the conduct of peer reviews. NEI asked if the statement meant that the staff had a concern that the peer review did

not function as intended. The staff highlighted that one of the functions of the peer reviews was to ensure that the walkdown report contained all of the information outlined in the walkdown guidance, however some Walkdown Reports appeared to be missing information (e.g., qualification or experience of peer reviewers, independence of peer reviewers).

The staff also presented slides that outlined a path forward to obtain the missing information. NEI expressed concern about the level of effort required to respond and the industry's ability to meet the staff's proposed schedule. In response, the staff stated they were open to further discussions about the most effective and appropriate process and schedule to address the missing information. However, staff noted that the information was needed to successfully complete walkdown report reviews. The staff explained their intention to conduct a follow-up public meeting to discuss the exact information the staff needs, the time frame by which the information is needed and the most effective process for obtaining that information. The target for the follow-up public meeting is the morning of September 12, 2013.

Enclosure:  
Participant list

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**ADAMS Accession No.:** ML13233A300

\*Concurrence via e-mail

<b>OFFICE</b>	NRR/JLD/PMB/PM	NRR/JLD/LA	NRR/JLD/PMB/BC	NRR/JLD/PMB/PM
<b>NAME</b>	LRegner	SLent*	MMitchell	LRegner
<b>DATE</b>	9/5/2013	9/5 /2013	9/5/2013	9/5/2013

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Public Conference Call on the Walkdown Reports and Walkdown Audits Associated with Japan

Lessons-Learned Near-Term Task Force Recommendation 2.3: Seismic Walkdowns

Thursday, August 15, 2013

Participant List

**Name:**

**Organization:**

Nilesh Chokshi	U.S. Nuclear Regulatory Commission (NRC)
Matt Mitchell	NRC
Annie Kammerer	NRC
Michelle Flanagan	NRC
James Isom	NRC
Andrew Murphy	NRC
Kimberly Keithline	NEI
William R. Horstman	Pacific Gas and Electric Company, Diablo Canyon Power Plant
Wing Ho	Exelon Oyster Creek Station
Ben Kosbab	Enercon
Larry Parker	STARS Alliance
Michael Hall	DTE Energy
Joseph Braverman	Brookhaven National Laboratory

Enclosure