

September 4, 2013

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

FROM: Allyce Bolger, Reactor Engineer **/RA/**  
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 AUGUST 7, 2013

On August 7, 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. ML13240A421) contains the white papers and presentations discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML13240A426) contains the Frequently Asked Questions (FAQ) Log and the FAQ discussed during the meeting; and Enclosure 4 (ADAMS Accession No. ML13240A427) contains an ROP WG action items log. Meeting attendees discussed topics related to probabilistic risk assessment (PRA), assessment, and performance indicators (PIs).

The PRA Operational Support Branch (APOB) informed the participants that the staff would be participating in the Region I PRA counterparts meeting that would be held August 21-22, 2013. The meeting participants planned to discuss subjects such as notice of enforcement discretion (NOED) review and significance determination process (SDP) topics.

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

The Reactor Inspection Branch (IRIB) did not discuss inspection topics during this public meeting. Chris Regan was introduced as the new IRIB Branch Chief to replace Tim Kobetz.

The Performance Assessment Branch (IPAB) staff informed meeting participants that the draft Commission paper, "Recommendations for Risk-Informing the Reactor Oversight Process for New Reactors," was discussed with the Advisory Committee on Reactor Safeguards (ACRS) on July 22, 2013 (ADAMS Accession No. ML13169A408). The ACRS and the industry shared their views on the paper during this meeting. The staff also mentioned that a separate public meeting was held August 5, 2013, to solicit feedback on the draft paper, and industry had noted its intent to submit formal comments. The draft Commission paper will be discussed again on September 5, 2013, during a full committee meeting and will be revised based on ACRS and other stakeholder comments before the final paper is submitted to the Commission in October 2013.

IPAB staff also discussed the status of the initiative to implement safety culture common language into ROP guidance documents. The staff plans to start by revising the components and aspects currently defined in Inspection Manual Chapter (IMC) 0310, "Components Within The Cross-Cutting Areas." The staff also will 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. IPAB staff noted that a working group had been created and that the first steps of revising the cross-cutting aspects (CCA) were underway. Industry representatives questioned when the revised guidance documents would be available for public comment, to which the staff responded that it would be in the September/October 2013 timeframe. Staff and industry decided that a public meeting separate from the ROP WG public meeting should be held to further discuss these changes to the CCAs, and that this will most likely be arranged to coincide with the October 2013 ROP WG public meeting. The 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 determining substantive cross-cutting issues.

IPAB staff also informed meeting participants about the ROP Enhancement Baseline Inspection public meeting held on July 17, 2013. The staff received many comments and suggestions in areas such as Assessment and Significance Determination Process along with comments on the Baseline Inspection Program. The staff will consider these comments for the Assessment Program enhancements. The ROP Independent Review is still in progress and the review team expects to provide a final report by early fall. The staff will incorporate insights from this report into the ROP Enhancement effort. Industry asked if the staff would be ready to hold another Baseline Inspection enhancement public meeting in the fall, as planned. The staff is reviewing all the inputs from the July 17<sup>th</sup> public meeting and the Federal Register Notice responses and expects to hold an internal meeting in early October to share conclusions and recommendations for the inspection program. The inspection staff is tentatively planning to hold another public meeting in early November to share the staff's conclusions and recommendations with external stakeholders.

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

- (1) The staff indicated that Duane Arnold's second quarter PI data were submitted late but this did not affect the timeliness of posting PI data to the public website.
- (2) The staff informed meeting participants that Crystal River 3 no longer submits PI data because of permanent shutdown. The second quarter PI data currently indicates invalid data on the public website. In addition, the staff noted that Kewaunee was removed from the PI public website because of permanent shutdown.
- (3) The staff indicated that a revised Reactor Program System (RPS) for displaying PI data would change the PI graphs' appearance; specifically, a solid line would be used for the current reporting period and a dotted line for historical data.
- (4) Industry representatives and NRC staff discussed the white paper on MS05, clarifying the definition of "additional failures" in NEI 99-02, Revision 6, for the Safety Systems Functional Failures PI. The staff does not support expanding the scope of evaluations to include design basis reconstitutions or significant programmatic engineering changes because these evaluations do not meet the intent of "not counting additional events when problems are discovered while resolving the original problem."

- (5) Industry representatives and NRC staff discussed a white paper on the probabilistic risk assessment (PRA) technical adequacy for mitigating systems performance index (MSPI). Industry representatives incorporated many of the staff's recommended changes to the white paper. The staff will provide comments on the white paper next meeting.
- (6) The staff at Wolf Creek briefed the ROP Working Group on issues related to their PRA site-model and applying the model to MSPI data. The ROP Working Group discussed NEI 99-02 guidance regarding the timeline of when PRA updates are applied to MSPI data. The staff determined that discussions with Region IV were needed to fully understand the background of the issue. The staff plans to address this topic at the next ROP public meeting.

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

- FAQ 13-02: This is a site-specific FAQ for Susquehanna, Unit 1. This FAQ addresses a rapid power reduction, which occurred during a rod pattern adjustment to address an issue on June 11, 2012. This FAQ was discussed, and the NRC will provide a proposed response at the next ROP WG public meeting.

The next ROP working group public meeting will be held on September 11, 2013.

Enclosures:

1. Attendance List – August 7, 2013
2. White papers discussed during the August 2013 ROP WG public meeting:
  - a. White paper on “Additional Failures” for MS05
  - b. White paper on “PRA Technical Adequacy for MSPI”
3. Reactor Oversight Process Task Force FAQ Log and Proposed FAQ 13-02 ‘Susquehanna Power Change’
4. ROP Working Group Action Items Tracking Log – August 07, 2013

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**ADAMS ACCESSION NO: ML13240A143 \*concurred via email ML Package: ML13240A428**

<b>OFFICE</b>	NRR/DIRS/IPAB	BC: NRR/DIRS/IRIB	BC:NRR/DRA/APOB	BC:NRR/DIRS/IPAB
<b>NAME</b>	ABolger	CRegan*	JCircle* for SWeerakkody	RFranovich
<b>DATE</b>	8/19/13	8/19/13	8/27/13	9/03/13

**REACTOR OVERSIGHT PROCESS PUBLIC MEETING**  
**REACTOR OVERSIGHT PROCESS**  
**PUBLIC MEETING**  
**ATTENDANCE LIST**  
**August 7, 2013**

Ronald Frahm	NRC
Michael Balazik	NRC
Rani Franovich	NRC
Kevin Roche	NRC
Allyce Bolger	NRC
Tim Kobetz	NRC
Chris Reagan	NRC
See Meng Wong	NRC
Vic Cusumano	NRC
Justin Vazquez	NRC
Steve Campbell*	NRC
Jim Slider	NEI
Victoria Anderson	NEI
Bruce Mrowca	ISC
Ron Gaston	Exelon
Duane Filchner	PPL Susquehanna
Steve Carton	NextEra Energy
Chris Earls*	NEI
Jana Bergman*	Scientech
Ken Heffner*	Certrec
Lenny Sueper*	Xcel Energy
Tony Zimmerman*	Duke Energy
Larry Parker*	STARS Alliance
Elijah Holsenbeck*	SNC
Roy Linthicum*	Exelon
Bill Ketchum*	WCNOC
Bill Mullenburg*	WCNOC
Brian Dorothy*	WCNOC
Sarah Zafer*	ERIN

\*participated via teleconference and/or online meeting