

October 9, 2013

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

FROM: Luis Cruz, Reactor Operations Engineer **/RA/**
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SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING
GROUP PUBLIC MEETING HELD ON SEPTEMBER 11, 2013

On September 11, 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. ML13280A253) contains the white papers discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML13280A257) contains the Frequently Asked Questions (FAQ) Log and the FAQ discussed during the meeting; and Enclosure 4 (ADAMS Accession No. ML13280A307) 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) did not discuss PRA topics during the APOB section of the public meeting.

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

The Reactor Inspection Branch (IRIB) staff discussed the interim resolution of scoping issues associated with 10 CFR 50.65(b)(2)(i), "Non-safety related structures, systems, or components (SSCs) that are relied upon to mitigate accidents or transients or are used in plant emergency operating procedures (EOPs)." The issue centers on what constitutes a non-safety related SSC that is "relied upon to mitigate accidents or transients," and which Final Safety Analysis Report (FSAR) chapters are considered. Although not considered guidance for the maintenance rule, NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures," (ADAMS Accession No. ML102560007) states "EOPs are plant procedures that direct operators' actions necessary to mitigate the consequences of transients and accidents. Since (1) EOPs are referenced in 10 CFR 50.65(b)(2)(i) and (2) the term "accidents or transients" is found in EOP guidance, the following interim action will be taken by the NRC program office for non-safety related SSCs pending identification of a staff position that directly addresses the issue. The NRC program office will indicate to the Regions that scoping criteria other than 10 CFR 50.65(b)(2)(i) should be considered for applicability when the issue of concern does not involve

EOPs. Section 8.2.1.3 of NUMARC 93-01 Rev. 4A contains guidance for scoping SSCs associated with EOP use. NEI indicated that it will consider addressing the issue in next revision to the NUMARC document.

IRIB staff provided an update on the review of NEI 13-01, "Reportable Action Levels for Loss of Emergency Preparedness Capabilities." When issues are resolved, the NRC plans to endorse NEI 13-01 via a Supplement to NUREG-1022, Revision 3. Issues are likely to be resolved in fall 2013. At that time, the NRC plans to issue a letter to NEI to communicate its intent to endorse NEI 13-01. Tentative plans include providing a Notice for Comment at the beginning of 2014 with a Notice of Availability towards the end of spring 2014. The NRC will identify differences between NEI 13-01 and NUREG-1022, Revision 3, at a future ROP meeting.

A public meeting was held in June 2013 (ADAMS Accession No. ML13182A334) to solicit comments on nine issues associated with 10 CFR 50.72(b)(3)(iv) / 50.73(a)(2)(iv), "System Actuations." The staff is currently reviewing stakeholder comments. Tentative disposition is likely to occur in early November 2013. The NRC will then contact NEI to schedule a public meeting.

The Performance Assessment Branch (IPAB) staff informed meeting participants that the meeting with the Advisory Committee on Reactor Safeguards (ACRS) full Committee on the draft Commission paper, "Recommendations for Risk-Informing the Reactor Oversight Process for New Reactors," was held on September 5, 2013. The ACRS and industry members shared their views on the paper during the September 5 meeting. The staff expects a letter to be issued from the ACRS in the coming weeks. The staff noted that feedback received from the ACRS and industry will be considered during the revision of the draft Commission paper. Additionally, the staff communicated that the Commission paper is on schedule to be sent to the Commission by October 2013.

IPAB staff gave an update on the status of the initiative on implementing safety culture common language into ROP guidance documents. The staff noted that a working group had been formed, which is currently in the process of revising the components and aspects currently defined in IMC 0310, "Components Within The Cross-Cutting Areas." IPAB staff will be making the draft publicly available and will have a separate public meeting to discuss proposed changes to IMC 0310. This meeting may coincide with an ROP WG public meeting. Additionally, the staff communicated its intention to document the safety culture common language in a NUREG document that should be available by early 2014.

IPAB staff informed industry representatives that efforts are in place to post a Federal Register Notice (FRN) for the ROP external stakeholder survey. The staff plans to have the survey issued this fall, but indicated that difficulties had been encountered in receiving approval from the Office of Management and Business (OMB) that may delay or prevent the issuance of the survey this year. If the survey does not receive approval by OMB in time to support the [CY 2013] ROP self-assessment, the staff would not issue the survey and the associated metrics would not be applicable. The staff also indicated that the NRC is considering suspending the external ROP survey process based on several factors, including: (1) the low response rates and limited new insights from year to year; (2) the staff's plans to revise the self-assessment metrics to improve objectivity in the measurement of ROP performance and minimize the reliance on more subjective measures such as stakeholder perception; and (3) the challenges in obtaining the necessary OMB clearance. NEI indicated its support for suspending

the survey, citing the two significant studies of ROP now underway: the Independent Assessment, led by Brian McDermott, and the ROP Enhancement Project, initiated by Ho Nieh, which have both offered extraordinary opportunities for stakeholder engagement and feedback in CY 2013. In addition, the NRC is exploring alternate avenues for obtaining stakeholder feedback on potential improvements to the ROP and will continue to review external stakeholder feedback from public meetings, particularly the monthly ROP Working Group meeting.

IPAB staff discussed the recent use of Inspection Manual Chapter (IMC) 0609 Appendix M, "Significance Determination Process Using Qualitative Criteria," in the disposition of external flood findings. The staff noted that Appendix M is expected to be used infrequently; however, several of the recent external flooding findings involved large uncertainties with the initiating event frequencies and mitigation equipment response. IMC 0609 Appendix A, "Significance Determination Process for Findings At-Power," was not an effective tool in estimating the safety significance of these findings because there was not a high degree of confidence in quantitative outcomes. As such, Appendix M was used to provide qualitative information to support the risk-informed decision-making process. Industry's PRA representatives provided feedback to the staff that Appendix M was not a transparent process and it was often unclear how a determination was reached. Industry asserted that the preliminary determination letters did not always specifically address what factors and assumptions were the most influential in determining the overall safety significance.

IPAB staff revisited concerns raised during an ROP WG meeting in early 2013 involving changes to the Risk Assessment Standardization Project (RASP) handbook. The industry indicated that the concerns raised during that meeting had been resolved but that an additional concern remained involving the use of event assessment conditional core damage probability (CCDP) in modeling the safety significance of a finding that causes an initiating event occurrence. Industry asserted that a conflict exists between the RASP Handbook and higher-level policy documents, which refer to delta core damage frequency (Δ CDF) as the metric used by the SDP. Industry representatives also argued that the RASP guidance may result in a greater-than-green input into the action matrix that is already accounted for under the unplanned scrams PI and/or the unplanned scrams with complications PI. The staff asked if industry representatives felt there was any appropriate circumstance for applying the event assessment CCDP approach to determine the safety significance of a finding, but industry representatives could not think of any examples. Industry representatives mentioned that they would provide an alternative approach to the RASP handbook changes regarding initiating event modeling. The industry also asked the staff what it plans to do in the interim. NRR staff indicated it will consider potential options to address the issue and discuss those options during the next ROP WG public meeting.

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

- (1) The staff informed meeting participants that Crystal River 3 has ceased submittal of PI data because of permanent shutdown and will be removed from the public website once the plant transitions to decommissioning phase. Crystal River's PIs are currently displayed on the public website as invalid.
- (2) The staff indicated that the website was updated to reflect the revised Reactor Program System (RPS) for displaying PI data. Specifically, the current reporting period for each PI is displayed as a solid line.

- (3) Industry will resolve comments provided by the staff on the PRA technical adequacy white paper during the November 2013 ROP WG public meeting.
- (4) The staff informed meeting participants that revision 7 to NEI 99-02 is in effect for data collection as of October 1, 2013. The staff communicated mutual understanding between NRC and industry that this document going forward would be a living document.
- (5) Industry provided feedback on the RCS leakage white paper and recommended that the basis for the RCS leakage indicator be modified to resolve the misalignment between the indicator's metric and basis. Industry communicated that the other options provided in the white paper would be difficult to implement. These options included developing a new leakage PI, changing the metric to unidentified leakage, and incorporating a performance limit.

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
- FAQ 13-03 (introduced): This is a generic FAQ developed by Quad Cities. This FAQ addresses a switchyard fault and resulting loss of the 13.8 kV bus that was caused by an animal intrusion. Consequently, Quad Cities had to ultimately reduce power on Unit 2 to 60% due to the loss of bus and reduced feedwater temperature.
- FAQ 13-04 (introduced): This is a site-specific FAQ for Point Beach, Units 1 and 2. This FAQ discusses that Point Beach will not be reporting PI data for the eight sirens that overlap with Kewaunee, as they are still the responsibility of Kewaunee. Once Kewaunee is no longer responsible for the eight sirens that overlap the Emergency Planning Zones, Point Beach will assume responsibility and will report the PI data.
- FAQ 13-05 (introduced): This is a generic FAQ submitted by Oyster Creek. This FAQ addresses a power reduction that occurred during the ascension of power following a planned down power.
- FAQ 13-06 (introduced): This is a generic FAQ developed by Dresden, Units 2 and 3. This FAQ addresses a difficulty in interpretation of PI guidance regarding to unplanned versus planned unavailability for the mitigating system performance index. This FAQ seeks a revision to NEI guidance to clarify unplanned and planned unavailable hours.
- FAQ 13-07(introduced): This is a generic FAQ developed by Diablo Canyon. This FAQ addresses emergency preparedness exercise performance where the licensee misidentified the emergency declaration prior to making the correct emergency declaration. There is a difference of opinion on how this scenario should be counted in the PI. The staff indicated that this FAQ would be accepted for consideration and discussed further during the next meeting.

The next ROP working group public meeting will be held on October 23, 2013.

Enclosures:

1. Attendance List – September 11, 2013
2. White Papers Discussed in the September 11, 2013 ROP WG Public Meeting
3. Reactor Oversight Process Task Force FAQ Log – September 11, 2013
4. ROP Working Group Action Items Tracking Log – September 11, 2013

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DATE	10/ 2 /2013	10/ 4 /2013	10/ 4 /2013	10/9 /2013

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REACTOR OVERSIGHT PROCESS PUBLIC MEETING
REACTOR OVERSIGHT PROCESS
PUBLIC MEETING
ATTENDANCE LIST
September 11, 2013

Ronald Frahm	NRC
Michael Balazik	NRC
Rani Franovich	NRC
Allyce Bolger	NRC
Christopher Reagan	NRC
See Meng Wong	NRC
Stephen Vaughn	NRC
Aron Lewin	NRC
Molly Keefe	NRC
Sunil Weerakkody	NRC
Neil Day	NRC
Jim Slider	NEI
Victoria Anderson	NEI
Bruce Mrowca	ISC
Ron Gaston	Exelon
Steve Carton	NextEra Energy
Chris Earls	NEI
Jana Bergman	Scientech
Lenny Sueper	Xcel Energy
Tony Zimmerman	Duke Energy
Larry Parker	STARS Alliance
Roy Linthicum	Exelon
William Ketchum	WCNOC
Sarah Zafer	ERIN
Greg Sosson	PSEG
Bob Walpole	Entergy
Tracy Honeycutt	SNC
Peter Wilson	TVA
Ken Heffner*	Certrec
Marty Hug*	NEI
Eric Schrader*	NRC
Steve Campbell*	NRC
Jason Smith*	Exelon
Joshua Smith*	Exelon
Thomas Magee*	NRC
Jason Jennings*	PPL

*participated via teleconference and/or online meeting