

November 21, 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/**
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 OCTOBER 23, 2013

On October 23, 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. ML13324B016) contains the white papers and handouts discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML13324B044) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting; and Enclosure 4 (ADAMS Accession No. ML13324B051) 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) staff indicated that it held a conference call with a Pressurized Water Reactor Owners Group (PWROG) representative to discuss the PWROG method and schedule to provide alternative approaches that can be used to enhance guidance in the Risk Assessment Standardization Project (RASP) handbook. The PWROG is developing a white paper on the use of event assessment conditional core damage probability (CCDP) in modeling the safety significance of a finding that causes an initiating event occurrence.

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

The Reactor Inspection Branch (IRIB) did not discuss inspection topics during this public meeting.

IPAB staff discussed a report from the Government Accountability Office (GAO), GAO-13-473, "Analysis of Regional Differences and Improved Access to Information Could Strengthen NRC Oversight." The report recommended that NRC: (1) analyze the causes of differences in identifying and resolving findings across regional offices and address these differences; (2) improve its database search tools; and (3) use operating experience more efficiently in oversight activities. The NRC responded to the report agreeing with the recommendations and

acknowledging that the staff is already working on these recommendations. An industry representative asked about who will be leading the analysis of inspection finding data across the regional offices. IPAB staff indicated that this effort would be performed mostly by IRIB, and some of the staff's actions in response to the report will be incorporated into the ROP Enhancements project activities.

Meeting participants asked the staff about interim actions to be implemented while the PWROG develops an alternative approach to using event assessment CCDP in modeling the safety significance of a finding that causes an initiating event occurrence. The staff indicated that it is reviewing the guidance in the RASP handbook and considering interim actions. Meeting participants asked if the staff considered reverting to a previous version of the RASP guidance until a mutually agreeable alternative method is developed. APOB staff indicated that it had not considered this option. The staff will provide an update on this topic in following ROP WG public meetings.

The Nuclear Security and Incident Response (NSIR) Office staff discussed lessons learned from a pilot inspection program completed earlier in 2013. The pilot inspections were conducted at four sites: Fitzpatrick, Cooper, Point Beach, and Surry. The staff received constructive feedback from industry on the execution of licensee annual Force-on-Force (FoF) exercises. Industry and NRC staff particularly discussed the FoF exercise critique process. FoF exercise critiques are performed immediately after completion of a FoF exercise. NSIR staff is considering ways to provide additional flexibility for the licensee to provide input after a FoF exercise.

IPAB staff provided a status update on the draft Commission paper, "Recommendations for Risk-Informing the Reactor Oversight Process for New Reactors." The Advisory Committee on Reactor Safeguards (ACRS) issued a letter to the staff to convey its views on the draft Commission paper. The staff mentioned that it is developing a response to the ACRS letter. The staff expects the Commission paper and ACRS response to be issued and made publicly available in the coming weeks.

IPAB staff discussed the status of the ROP external stakeholder survey. The staff indicated that difficulties had been encountered in receiving approval from the Office of Management and Budget (OMB) to post a Federal Register Notice for the ROP external stakeholder survey. If the survey does not receive approval by OMB in time to support the calendar year (CY) 2013 ROP self-assessment, the staff will not issue the survey and the associated metrics will not be applicable. IPAB staff mentioned that it plans to review the ROP self-assessment metrics and the utility of the survey during fiscal year 2014. The staff also mentioned that it expects the ROP Independent Assessment report to be issued by the end of CY 2013.

IPAB staff discussed the assessment program portion of the ROP Enhancements project. The staff provided meeting participants with a project plan including the project's preliminary scope and milestones. The staff plans to explore various areas for possible enhancements, including: (1) supplemental inspection completion timeliness, (2) substantive cross-cutting issue (SCCI) effectiveness, (3) addressing long-standing SCCIs, and (4) action matrix column distinctions. The staff plans to hold a public meeting on November 21st, 2013, to discuss the scope of the assessment portion of the ROP Enhancement project and gather feedback from external stakeholders. Industry representatives requested an update on the ROP Enhancements initiatives during the next ROP WG public meeting.

IPAB staff provided a status update on the initiative to implement safety culture common language into ROP guidance documents. The staff indicated that a public meeting will be held on November 13, 2013, to discuss changes made to IMC 0310, "Components Within The Cross-Cutting Areas." IPAB staff plans to make the revised guidance available to the public before the meeting.

IPAB staff provided meeting participants with a draft technical basis for Inspection Manual Chapter (IMC) 0609 Appendix M, "Significance Determination Process Using Qualitative Criteria." The staff solicited external stakeholder feedback on the IMC 0609 Appendix M technical basis document by the November 20, 2013, 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 the PI data for third quarter of 2013 will be updated on the public website on November 4, 2013. Both units of the San Onofre Nuclear Generation Station (SONGS) will display invalid PI results. The staff expects to remove SONGS PI data for the fourth quarter of 2013.
- (2) The staff discussed a concern with meeting participants pertaining to the timing of crediting a plant modification into the plant's PRA. The specific concern was related to the completion of post-modification testing. Industry will consider addressing the concern in the PRA technical adequacy white paper.
- (3) Industry plans to resolve comments provided by the staff on the PRA technical adequacy white paper in early 2014.
- (4) The staff requested that industry provide a written response to the RCS Leakage White Paper. Industry verbally recommended during the September ROP monthly meeting that the basis of the RCS Leakage PI basis be modified to resolve the misalignment between the indicator's metric and basis.

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

- FAQ 13-02: This FAQ is final. 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. The staff concluded that the event in question counted as an occurrence toward the Unplanned Power Changes per 7,000 Critical Hours PI, and recommended clarifying the guidance in NEI 99-02.
- FAQ 13-03: This FAQ is tentative final. 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. The staff agrees with the licensee that the fence represents a reasonable measure to prevent animal intrusion. The staff considers the event a unique environmental condition and indicated that this event will serve as operating experience such that future occurrences of similar events would be anticipated.
- FAQ 13-04: This FAQ was discussed. 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. The staff plans to provide a response during the next ROP WG public meeting.

- FAQ 13-05: This FAQ was discussed. 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. The staff requested more information on the event conditions to inform its response to this FAQ.
- FAQ 13-06: This FAQ was discussed. This is a generic FAQ developed by Dresden, Units 2 and 3. This FAQ addresses interpretation of PI guidance regarding unplanned versus planned unavailability for the mitigating system performance index. This FAQ seeks a revision to NEI guidance to clarify the distinction between unplanned and planned unavailable hours.
- FAQ 13-07: This FAQ was discussed. This is a generic FAQ developed by Diablo Canyon. This FAQ addresses emergency preparedness exercise performance. Specifically, 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 plans to provide a response during the next ROP WG public meeting.

The next ROP working group public meeting will be held on November 20, 2013.

Enclosures:

1. Attendance List – October 23, 2013
2. White Papers Discussed in the October 23, 2013 ROP WG Public Meeting
3. Reactor Oversight Process Task Force FAQ Log – October 23, 2013
4. ROP Working Group Action Items Tracking Log – October 23, 2013

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NAME	LCruz	SWeerakkody*	RFranovich
DATE	11/ 12 /13	11/ 19 /13	11/21/13

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REACTOR OVERSIGHT PROCESS PUBLIC MEETING
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PUBLIC MEETING
ATTENDANCE LIST
October 23, 2013

Luis Cruz	NRC
Ronald Frahm	NRC
Michael Balazik	NRC
Rani Franovich	NRC
Stephen Vaughn	NRC
Daniel Merzke	NRC
Andrew Waugh	NRC
Ross Telson	NRC
See Meng Wong	NRC
Eric Schrader	NRC
Scot Sullivan	NRC
George Smith	NRC
Bruce Mrowca	ISL
Jim Slider	NEI
Steve Catron	NextEra Energy
Larry Parker	STARS Alliance
Lenny Sueper	Xcel Energy
Tony Zimmerman	Duke Energy
Chris Earls	NEI
Jana Bergman	Sciencetech
Sarah Zafer	ERIN
Greg Sosson	PSEG
Robin Ritzman	FENOC
Larry Naron	CENG
Tracy Honeycutt	SNC
Peter Wilson	TVA
Cindy Williams	FENOC
Marty Hug*	NEI
Victoria Anderson*	NEI
Ron Gaston*	Exelon
Carlos Cisco*	Winston
Dennis Moore*	Exelon
David Schumacher*	Exelon

*participated via teleconference and/or online meeting