

February 14, 2014

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 JANUARY 15, 2014

On January 15, 2014, 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. ML14041A251) contains the white papers and handouts discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML14041A254) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting; and Enclosure 4 (ADAMS Accession No. ML14041A257) contains an ROP WG action items log. Meeting attendees discussed topics related to probabilistic risk assessment (PRA), assessment, and performance indicators (PIs).

The PRA Operations and Human Factors Branch (APHB) staff mentioned that a public meeting was held on January 8th, 2014, with the Pressurized Water Reactor Owners Group (PWROG) to discuss Sections 8, "Initiating Event Analyses," and 9, "Human Reliability Analyses," of the Risk Assessment of Operational Events (RASP) handbook. The staff mentioned that it is pursuing resolution of two items discussed during the January 8th, 2014, public meeting. The staff indicated that it plans to conduct separate public meetings to discuss this topic. Industry representatives mentioned that the PWROG is developing a white paper on the use of event assessment CCDP in modeling the safety significance of a finding that causes an initiating event occurrence. APHB staff also indicated that the NRC's Standardized Plant Analysis Risk (SPAR) models are available to the licensees by request to the Office of Research (RES). The staff indicated that Kevin Coyne, Chief of the PRA Branch in RES, is the point of contact for access to SPAR models.

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

The Reactor Inspection Branch (IRIB) mentioned that it will hold a public meeting on February 5<sup>th</sup>, 2014, to discuss the recommended enhancements to the ROP baseline inspection program. This meeting is a follow-up to the public meeting held on July 17, 2013, to obtain public

comments on the baseline inspection program. The staff plans to issue a report with its recommendations in spring 2014.

The Performance Assessment Branch (IPAB) staff discussed upcoming management changes in the Division of Inspection and Regional Support (DIRS). Ho Nieh, DIRS Director, will be transferring to Region I; Allen Howe, DIRS Deputy Director, will assume the lead role for managing the ROP Enhancement project; and, Craig Erlanger, from the Office of Nuclear Security and Incident Response, will be acting as the DIRS Deputy Director for three months, starting at the end of January 2014. IPAB staff also introduced Eric Powell as a new IPAB member.

IPAB staff mentioned that it is working on the ROP self-assessment for calendar year 2013, which will include insights from the ROP independent review led by Brian McDermott, the ROP Enhancement project, the Industry Trends Program, and other ROP-related efforts. The staff informed meeting attendees that Commission paper, "Recommendations for Risk-Informing the Reactor Oversight Process for New Reactors," was issued on December 17<sup>th</sup>, 2013, as SECY-13-0137. IPAB staff mentioned that Inspection Manual Chapter (IMC) 0310, "Aspects within Cross-Cutting Areas," was revised to incorporate safety culture common language. The revised version of IMC 0310 was issued on December 19<sup>th</sup>, 2013, and became effective on January 1<sup>st</sup>, 2014. The staff also mentioned that it will hold a public meeting on February 5<sup>th</sup>, 2014, to discuss the assessment portion of the ROP Enhancement project.

Industry representatives provided a proposed schedule for the 2014 ROP WG public meetings. The proposed schedule reduces the meeting frequency to holding one every other month and thereby reduces the travel burden for industry representatives. Industry and staff agreed that additional meetings may be scheduled if needed. In response to feedback from meeting attendees participating by phone that the sound quality was poor, IPAB staff indicated that it will explore using other venues with better audio-visual capabilities for future ROP WG public meetings.

IPAB staff received comments from industry representatives on a draft technical basis for IMC 0609 Appendix M, "Significance Determination Process Using Qualitative Criteria." The staff plans to issue this technical basis in spring 2014.

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

- (1) Industry discussed a white paper on consequences to the safety system functional failures (SSFF) PI. This paper explains that clarifications to Section 3.2 of NUREG 1022, "Event Reporting Guidelines: 10 CFR 50.72 and 50.73," are leading to an increase in reports of SSFFs for events in which there is not a true loss of safety function, but momentary conditions in which Technical Specification operability criteria are not satisfied. IPAB staff indicated that a provision exists in PI reporting guidance, NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," that allows the licensee to perform an engineering analysis to determine if the event is reportable as a SSFF PI occurrence. IPAB staff further reminded stakeholders that this provision has *always* existed in NEI 99-02. The status of this white paper will be discussed during the next ROP working group meeting.
- (2) Staff presented a white paper on performance indicator validity during extended shutdown and subsequent startup. This white paper was previously vetted through the

ROP WG. Specifically for the Mitigating Systems Performance Index (MSPI) indicators, Industry and staff agreed that the NRC will determine, in consultation with the ROP WG, when the MSPI PI data will be valid for plants starting up from an extended shutdown, based on plant-specific considerations.

- (3) The staff indicated that a generic FAQ associated with the white paper, "DEP and Participation Credit for Non-active SRO (Generic)," is needed to revise the language in NEI 99-02. This white paper was introduced in June 20, 2013, and proposes to clarify guidance about the Drill/Exercise Performance and Emergency Response Organization Drill Participation PIs in NEI 99-02. The staff expects Industry to provide this generic FAQ during the next ROP WG public meeting.
- (4) The staff acknowledged receiving Industry's written response to the RCS Leakage White Paper and recommendation that the basis of the RCS Leakage PI be modified to resolve the misalignment between the indicator's metric and basis. The staff did not provide additional comments on this white paper.
- (5) Industry introduced a white paper proposing to clarify the definition of initial transients for the Scrams with Complications PI in NEI 99-02. The staff will provide comments on this white paper during the next ROP WG public meeting.
- (6) The staff provided comments on a white paper clarifying the definition of concurrent failures, thereby incorporating the resolution of FAQ 12-04. Industry will provide comments on this white paper during the next ROP WG public meeting.
- (7) Industry indicated that it plans to introduce an MSPI white paper on the exclusion of low risk trains/segments from the unavailability index during the next ROP WG public meeting.

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

- FAQ 13-03: This FAQ is 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 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. No additional comments were provided during this meeting.
- FAQ 13-04: This FAQ was discussed. This is a site-specific FAQ for Point Beach, Units 1 and 2. This FAQ indicates that Point Beach will not be reporting Alert and Notification System Reliability PI data for the eight sirens that overlap with Kewaunee, as they are still the responsibility of Kewaunee. Point Beach recommends documenting siren status in the comments section of the PI until Kewaunee is no longer responsible for the eight sirens that overlap the Emergency Planning Zones. After that time, Point Beach will assume responsibility and will report the PI data. The NRC staff does not agree with this position, because Kewaunee is no longer under the purview of the ROP. The staff's position is that Point Beach is responsible for these eight sirens under the ROP. Industry indicated its intent to withdraw the FAQ. The staff plans to reassess its position and 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 indicated that this event should count as an unplanned down power. The industry requested the staff to reconsider its basis

for this preliminary position. The staff will review the basis and revise it if appropriate, but expects this FAQ to become tentative final during the next ROP WG public meeting.

- FAQ 13-06: This FAQ is final. 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. The staff agreed that the hours the high-pressure coolant injection system was unavailable would be planned unavailability hours.
- FAQ 13-07: This FAQ is final. This is a generic FAQ developed by Diablo Canyon. This FAQ involves emergency preparedness exercise performance. Specifically, the licensee misidentified the emergency declaration prior to making the correct emergency declaration. The staff believes that the misidentified emergency declaration should count towards the PI. Industry does not agree with this position. The staff reminded Industry that it could appeal the resolution of this FAQ. The staff will consider adding information to support the basis for its response and will inform Industry of any changes made to the final NRC response.

Industry proposed to hold the next ROP WG public meeting on March 25, 2014. The staff and Industry will discuss the proposed dates for future ROP WG public meetings and decide the official date for the next meeting. The NRC will notice the next ROP WG public meeting accordingly on its public website.

Enclosures:

Attendance List – January 15, 2014

White Papers Discussed in the January 15, 2014, ROP WG Public Meeting

Reactor Oversight Process Task Force FAQ Log – January 15, 2014

ROP Working Group Action Items Tracking Log – January 15, 2014

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**ADAMS ACCESSION NO: ML14041A236      ADAMS Package No. ML14041A260      \*concurring via email**

<b>OFFICE</b>	NRR/DIRS/IPAB	BC: NRR/DRA/APHB	NRR/DIRS/IRIB	BC: NRR/DIRS/IPAB
<b>NAME</b>	LCruz	SWeerakkody*	CRegan*	RFranovich
<b>DATE</b>	2/4/14	2/10/14	2/5/14	2/14/14

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
January 15, 2014**

Luis Cruz	NRC
Ronald Frahm	NRC
Rani Franovich	NRC
Stephen Vaughn	NRC
Daniel Merzke	NRC
Andrew Waugh	NRC
Eric Powell	NRC
Aron Lewin	NRC
See-Meng Wong	NRC
Eric Schrader	NRC
Bob Kahler	NRC
Chris Regan*	NRC
Marsha Gamberoni*	NRC
Steve Campbell*	NRC
Jim Slider	NEI
Marty Hug	NEI
Roy Linthicum	PWROG/Exelon
Steve Catron	NextEra Energy
Larry Parker	STARS Alliance
Lenny Sueper	Xcel Energy
Tony Zimmerman	Duke Energy
Deann Raleigh	Sciencetech
Robin Ritzman	FENOC
Tracy Honeycutt	SNC
Peter Wilson	TVA
Elijah DeVaughn	SNC
Gary Miller	Dominion
Dave Mannai	Entergy
Ron Gaston	Exelon
Greg Sosson	PSEG
Duane Filchner	PPL Susquehanna
Chris Earls*	NEI
Nick Patton*	NEI
Ken Heffner*	Certrec
Sarah Zafar*	ERIN
Carlos Cisco*	Winston
Suzanne Leblang*	
Dennis Moore*	

\*participated via teleconference and/or online meeting