

\*\*\*\*\*Notice Revised Due to Location Change\*\*\*\*\*

May 21, 2014

MEMORANDUM TO: Anthony J. Mendiola, Chief  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Jonathan G. Rowley, Project Manager /RA/  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

SUBJECT: FORTHCOMING PUBLIC MEETING TO DISCUSS THE STATUS  
OF INDUSTRY RESOLUTION OF OPEN PHASE CONDITION  
(BULLETIN 2012-01: DESIGN VULNERABILITY IN ELECTRIC  
POWER SYSTEM)

DATE & TIME: Wednesday, June 4, 2014  
1:00 p.m. - 4:00 p.m.

LOCATION: U.S. Nuclear Regulatory Commission (NRC)  
One White Flint North, Room ~~0-4B6~~ **O-1F16**  
11555 Rockville Pike  
Rockville, MD 20852

PURPOSE: To discuss the status and path forward to resolve the open phase  
condition (OPC) design vulnerability (NRC Bulletin 2012-01:  
Design Vulnerability in Electric Power System).

CATEGORY 2\*: This is a Category 2 Meeting. The public is invited to participate  
in this meeting by discussing regulatory issues with the NRC at  
designated points identified on the agenda. A conference number  
is available upon request from the point of contact.

CONTACT: Jonathan G. Rowley, NRR  
301-415-4053  
[Jonathan.Rowley@nrc.gov](mailto:Jonathan.Rowley@nrc.gov)

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\* Commission's Policy Statement on Enhancing Public Participation in NRC Meetings,"  
(67 FR 36920), May 28, 2002

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NOTE:

Interested members of the public can participate in this meeting via a toll-free audio teleconference. For additional details, please call the NRC meeting contact listed on the NRC Public Meeting Notice. Seating may be limited and will be available on a first-come basis. Inform the NRC's meeting contacts of your intention to attend by June 2, 2014.

The NRC provides reasonable accommodation to individuals with disabilities where appropriate. If you need a reasonable accommodation to participate in a meeting, or need this meeting notice or a transcript or other information from a meeting in another format (e.g., Braille, large print), please notify the NRC's meeting contact. Determinations on requests for reasonable accommodation will be made on a case-by-case basis.

PARTICIPANTS:

Participants from the NRC include members of the Office of Nuclear Reactor Regulation, the Office of New Reactors, and the Office of Enforcement.

NRC

J. Rowley  
P. Hiland  
J. Zimmerman  
R. Mathew  
L. Burkhart  
J. Wray  
R. Daley  
N. Hilton  
C. Faria-Ocasio, et al.

Industry

S. Greenlee  
J. Butler  
G. Clefton, et al.

Enclosures

1. Agenda
2. Draft Interim Enforcement Policy

A. Mendiola

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<u>NRC</u>	<u>Industry</u>
J. Rowley	S. Greenlee
P. Hiland	J. Butler
J. Zimmerman	G. Clepton, et al.
R. Mathew	
L. Burkhart	
J. Wray	
R. Daley	
N. Hilton	
C. Faria-Ocasio, et al.	

Enclosures

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2. Draft Interim Enforcement Policy

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<b>NAME</b>	JRowley	DBaxley	AMendiola	JRowley
<b>DATE</b>	05/21/2014	05/21/2014	05/21/2014	05/21/2014

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## **AGENDA**

### **INDUSTRY AND U.S. NUCLEAR REGULATORY COMMISSION (NRC) MEETING TO DISCUSS THE STATUS AND PATH FORWARD TO RESOLVE THE OPEN PHASE CONDITION DESIGN VULNERABILITY (NRC BULLETIN 2012-01)**

**JUNE 4, 2014**

- |                  |  |
|------------------|--|
| 1:00 - 1:10 p.m. | Introduction and Welcome (NRC/Nuclear Energy Institute (NEI))  |
| 1:10 – 1:20 p.m. | Opening Remarks (NRC)  |
| 1:20 - 1:30 p.m. | Opening Remarks (Industry/NEI)   |
| 1.30- 2:15 pm    | Discussion on 1) Branch Technical Position on OPC/50.55a (h)(2) or (3) Requirements and 2) Draft Interim Enforcement Policy in Support of Enforcement Discretion |
| 2:15 -2.30 p.m.  | Break  |
| 2:30 - 3:45 p.m. | Industry Feedback/Status/Presentations (Industry, NEI, Electric Power Research Institute)  |
| 3:45 - 4:00 p.m. | Public Comment, Recap, and Adjourn   |

**DRAFT**

**Interim NRC Enforcement Policy**

9.X Enforcement Discretion for Open Phase Conditions within Electric Systems

This section sets forth the interim enforcement policy that the NRC will follow to exercise enforcement discretion for certain noncompliances with the requirements specified in technical specification (TS) for “Electrical Power Systems” (typically Section 3.8) and action statement(s) associated with “AC Sources-Operating” which would require a reactor shutdown if a licensee could not come into conformance within the TS action statement timeframe. This interim policy is applicable to operating power reactor licensees for resolving open phase condition design vulnerabilities within an electrical power system which has been identified as not conforming to the requirements of the current General Design Criterion (GDC) 17, “Electric Power Systems,” or the applicable principal design criteria in the updated final safety analysis report. Reactor licensees intending to cease power operations and begin decommissioning activities before December 31, 2017, need only comply with the immediate actions listed below to qualify for enforcement discretion.

Once a licensee determines that open phase condition design vulnerability is non-conforming, an operability determination must be performed for the affected electric system. If a licensee concludes that the TS required electric system is inoperable, the licensee must follow any remedial actions permitted by the applicable TS(s) until the limiting condition(s) for operation can be met. In certain instances, a licensee may not meet the required action(s) or be able to restore conformance with the licensing basis within the timeframe allowed by TS and would be required to enter a shutdown action statement.

Consideration of the following two open phase conditions must be addressed when determining the extent of the design vulnerability within an electric power system.

- (1) loss of one of the three phases of the offsite power circuit on the high voltage side of a transformer connecting a GDC-17 offsite power circuit to the transmission system under all operating electrical system configurations and loading conditions, with and without a high impedance ground fault condition; and
- (2) loss of two of the three phases of the offsite power circuit on the high voltage side of a transformer connecting a GDC-17 offsite power circuit to the transmission system under all operating electrical system configurations and loading conditions.

If a licensee declares a TS controlled electrical system inoperable and is unable to restore the electrical system to operable status within the timeframe allowed by TS, the licensee must perform the following actions in order to qualify for enforcement discretion and continue reactor operation.

**Immediate Actions:**

- Evaluate for reportability under 10 CFR 50.72 and 50.73.
- Enter the nonconformance in the corrective action program.
- Establish contingencies, which could include compensatory and/or mitigating actions

- Assess and manage plant risk related to maintenance and surveillance activities in accordance with 10 CFR 50.65(a)(4).

Although these immediate actions will not return the affected electrical power systems to an operable status, they will maintain the availability of the electric power systems. These immediate actions shall remain in place until permanent plant modifications are completed and this discretion is no longer needed.

**Long Term Actions:**

By December 31, 2015:

- Submit appropriate revisions to plant Technical Specifications

By December 31, 2017:

- Complete all plant modifications required to be consistent with the criteria specified in NRC NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" Branch Technical Position (BTP) 8-9, "Open Phase Conditions in Electric Power System," The licensee will be in full compliance with General Design Criterion (GDC) 17, "Electric Power Systems," or the applicable principal design criteria in the updated final safety analysis report; the design criteria for protection systems under 10 CFR 50.55a(h)(2); and Technical Specifications for "Electrical Power Systems".