



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

June 19, 2014

MEMORANDUM TO: Donald Chung, Chief
PRA Operations and Human Factors Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Antonios Zoulis, Reliability and Risk Analyst /RA/
PRA Operations and Human Factors Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE MAY 28, 2014, PUBLIC MEETING TO
COMMENT ON THE NUCLEAR ENERGY INSTITUTE DRAFT
GUIDANCE FOR PRIORITIZATION AND SCHEDULING
IMPLEMENTATION

The U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting on May 28, 2014, to discuss comments on the Nuclear Energy Institute's (NEI) draft guidance for prioritization and scheduling implementation transmitted to the NRC via letter on April 15, 2014, (Agencywide Documents Access and Management System Accession (ADAMS) Accession No. ML14105A481). The meeting was held at the NRC headquarters location in Rockville, Maryland. The draft guidance is a response to the Staff Requirements Memorandum (SRM) on COMGEA-12-0001/COMWDM-12-0002, "Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency," dated February 6, 2013, (ADAMS Accession No. ML13037A541) or commonly known as the Risk Prioritization Initiative (RPI). More specifically, the NRC staff conducted a public meeting in April 24, 2014, (ADAMS Accession No. ML14119A235) and saw the need to further discuss overall comments as well as specific comments to the NEI guidance on Security, Emergency Preparedness, and Radiation Protection.

The meeting notice and agenda is available in ADAMS under Accession No. ML14133A456. The meeting handouts are available in ADAMS under Accession Nos. ML14147A424 (NEI revised Emergency Preparedness Flowchart) and ML14147A436 (NEI revised Radiation Protection Flowchart). Information about RPI can also be found on Regulations.gov Docket ID NRC-2013-0064. Enclosed is a list of the meeting participants.

CONTACT: Antonios Zoulis, NRR/DRA
301-415-1209

The following key areas were discussed:

General Remarks:

- The staff presented to NEI detailed comments on the overall guidance and committed to sending the comments to NEI by June 6, 2014. In addition to general comments on the overall process, detailed comments on the Security, Emergency Preparedness, and Radiation Protection were also included as part of the Staff's review. The detailed comments were sent to NEI via email on June 5, 2014, which contained an attachment of the NEI draft guidance with comments (ADAMS Accession Nos. ML14157A112 and ML14157A113 respectively).

Security

- Subject matter experts (SMEs) from industry and the NRC on Security were present to discuss the Security flowchart presented in the NEI draft guidance. The comments from Security were as follows:
 - It is not clear in the NEI draft guidance that measures required for adequate protection are not to undergo the process described in the document.
 - The construct for security is based on the construct developed for safety, which utilizes a PRA approach. However, the risk associated with security is a conditional risk (e.g., the probability of an attack is equal to one), as the likelihood of an initiating event is unknown and not random. Consideration should be given to use a different approach for assessing risk for security measures.
 - When conditional risk is assessed at a facility for security, the typical Probabilistic Risk Assessment approach is not used. In general, path analysis is used, which looks at several layers: detection, assessment, response, and interdiction. The timelines help to establish security margins. Early detection and delay features tend to improve the conditional risk.
 - When measures are considered to establish a ranking of priorities, safety measures can be prioritized at a level 1. However, security measures can be scored no higher than a level 2. It is not clear that the restriction is appropriate.
 - The document should include a discussion of evaluating all measures under consideration for their impacts on safety, security, emergency response, and radiological protection. Addressing these impacts is critical to the overall protection of the public health and safety.
 - A statement should be provided that this methodology only applies to new requirements and industry initiatives, and not to existing requirements that are already implemented at the facility.
 - It would be helpful to see the methodology applied to security measures. This would allow the methodology to be assessed based on how it is applied, rather than in an abstract form. In addition, the approach should be demonstrated in an exercise that shows how security/safety/emergency response/radiological protection can be assessed in combination to achieve an overall risk-informed prioritization.

Emergency Preparedness

- SMEs from industry and the NRC on Emergency Preparedness (EP) were present to discuss the EP flowchart presented in the NEI draft guidance. The EP flowchart was revised to include inspection findings as a measure of significance similar to the Reactor Oversight Process Significance Determination Process (SDP) thresholds. In addition,

the flowchart allows for non-compliance issues to be prioritized. Some NRC staff members were hesitant to include inspection findings or non-compliance issues as part of the prioritization process. However, the EP SMEs maintained that most issues would be covered under the normal planning and budgeting process of licensee's EP group and very few issues would be required to be prioritized. Lastly, any issues involving compliance or issues of greater than low safety significance (SDP Green Issues) that rise above routine issues would be prioritized "HIGH" using the draft process.

Radiation Protection

- The NEI presented the revised Radiation Protection (RP) flowchart to the NRC staff and it was noted that improvements were made from the previous versions of the NEI draft guidance. NRC staff were concerned that RP issues would continuously be prioritized low and commented that observing the implementation of the process with RP issues would help further clarify the use and application of the draft prioritization process.

Next Steps:

- The NRC staff will continue to engage with NEI on public meetings to ensure the draft guidance addresses the comments presented in this summary. In addition, the Staff will participate in the demonstration pilots of the draft guidance to gather insights to help develop the March 2015 notation vote paper for Commission consideration.
- NEI indicated that additional lessons-learned and feedback from demonstration pilots will be incorporated in final guidance that is anticipated for Fall 2014.

Enclosure:
Attendance List.

the flowchart allows for non-compliance issues to be prioritized. Some NRC staff members were hesitant to include inspection findings or non-compliance issues as part of the prioritization process. However, the EP SMEs maintained that most issues would be covered under the normal planning and budgeting process of licensee's EP group and very few issues would be required to be prioritized. Lastly, any issues involving compliance or issues of greater than low safety significance (SDP Green Issues) that rise above routine issues would be prioritized "HIGH" using the draft process.

Radiation Protection

- The NEI presented the revised Radiation Protection (RP) flowchart to the NRC staff and it was noted that improvements were made from the previous versions of the NEI draft guidance. NRC staff were concerned that RP issues would continuously be prioritized low and commented that observing the implementation of the process with RP issues would help further clarify the use and application of the draft prioritization process.

Next Steps:

- The NRC staff will continue to engage with NEI on public meetings to ensure the draft guidance addresses the comments presented in this summary. In addition, the Staff will participate in the demonstration pilots of the draft guidance to gather insights to help develop the March 2015 notation vote paper for Commission consideration.
- NEI indicated that additional lessons-learned and feedback from demonstration pilots will be incorporated in final guidance that is anticipated for Fall 2014.

Enclosure:
Attendance List.

DISTRIBUTION:

PUBLIC	RidsNrrDra	RidsNrrDraAphb	TInverso, NRR
Nrr_Dra_Aphb	FFerrante, NRR	SSloan, NRR	

ADAMS ACCESSION No: ML14169A075

OFFICE	NRR/DRA/APHB	BC: NRR/DRA/APHB
NAME	AZoulis	DChung
DATE	6/ 18 /14	6/ 19 /14

OFFICIAL RECORD COPY

ATTENDANCE LIST

May 28, 2014 (Wednesday)

PARTICIPANT	AFFILIATION
Sunil Weerakkody	Nuclear Regulatory Commission (NRC)
Rani Franovich	NRC
Antonios Zoulis	NRC
Fernando Ferrante	NRC
Mike Buckley	NRC
Randy Sullivan	NRC
See-Meng Wong	NRC
Steve Garry	NRC
Michael Montecalvo	NRC
Joseph Rivers	NRC
Dennis Gordon	NRC
Russell Felts	NRC
Kati Austgen	Nuclear Energy Institute (NEI)
Jerry W. Hiatt	NEI
Ellen Anderson	NEI
Jerud Hanson	NEI
Bill Gross	NEI
David Young	NEI
Otto Gustafson*	Entergy Palisades

* Participate via video-conference or teleconference

ENCLOSURE