

December 17, 2014

MEMORANDUM TO: Nathan Sanfilippo, Chief
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Andrew Waugh, 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 NOVEMBER 19, 2014

On November 19, 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.: ML14349A367) contains the white papers and handouts discussed during the meeting; Enclosure 3 (ADAMS Accession No.: ML14349A399) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting; and Enclosure 4 (ADAMS Accession No.: ML14349A431) contains an ROP WG action items log. Meeting attendees discussed topics related to probabilistic risk assessment (PRA), assessment, and performance indicators (PIs).

The Operating Experience Branch (IOEB) staff briefed the status of the seven recommendations from the 2012 IOEB team study on exceeding active component design service life (ADAMS ML13044A469). These recommendations included proposed changes to the ROP baseline inspection program, particularly with Inspection Procedure (IP) 71111.12, "Maintenance Effectiveness", and Inspection Manual Chapter (IMC) 0612, Appendix E, "Operating Reaction Inspection Reports, Examples of Minor Issues". The changes increase inspector awareness of assessing Structure, System, and Components (SSCs) that are in service beyond vendor recommended service life without an appropriate engineering evaluation justifying continued service. The staff also encouraged the industry to consider updating NUMARC 93-01 "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" to encourage licensees to implement life-cycle preventative maintenance programs that serve to supplement performance-based practices for those active SSCs that can benefit from such approaches.

The Security Training and Support Branch (STSB) staff from the Office of Nuclear Security and Incident Response discussed their current efforts to evaluate the Force on Force program as directed by Staff Requirements Memorandum 14-001. The staff has received input from internal and external stakeholders which has been factored into their response that is currently being reviewed by the Commission for a vote.

The STSB staff also mentioned that it is currently in the process of conducting a comprehensive review of the Security Significance Determination Process. The staff has established a Task Force that has reviewed the current Security SDP and in the process of making a proposal to enhance it. Once the proposal is completed it will be shared with the ROP WG to receive feedback.

The Reactor Inspection Branch (IRIB) staff indicated that an Enforcement Guidance Memorandum (EGM) was no longer being pursued for the 10 CFR 50.72 and 50.73 event reporting of momentary inoperabilities of the secondary containment. In reviewing event reports from July 1, 2013 through June 30, 2014, most of the reports appear to be coming from a limited number of sites, are repetitive in nature, and appear to be due primarily to equipment issues or procedural errors/inadequacies. As a result, an EGM would have little applicability or benefit for the majority of the events. A copy of the event report data is in Enclosure 3.

The NRC indicated that absent rulemaking, there are no plans to revise NUREG-1022 to specifically exclude momentary inoperabilities of the secondary containment from event reporting. Providing such guidance in NUREG-1022 would be contrary to 10 CFR 50.72(b)(3)(v) and 50.73(a)(2)(v) in that the rule does not offer such exceptions.

As one means of addressing the momentary inoperability of the secondary containment, the NRC noted that Technical Specification Task Force (TSTF)-511, Revision 0, "Address Transient Secondary Containment Conditions" (ML14304A034) has been submitted to the NRC for review. If TSTF-511 is approved by the NRC, it could then be adopted by specific sites.

IRIB staff is currently working with regional representatives to draft a new version of the Component Design Bases Inspection (CDBI) procedure, IP 71111.21 for use at selected sites during calendar year 2015. The new engineering inspection procedure will include ROP Enhancement recommendations associated with the CDBI inspection procedure. IRIB staff plans to have a draft, working copy of the new engineering inspection procedure available for regional review during first quarter of 2015 and complete trial inspections using the new engineering inspection procedure in each of the four regions during the calendar year 2015. After the trial inspections, the IRIB staff plans to incorporate lessons learned from the trial inspections into the new engineering inspection procedure. This new engineering inspection will satisfy the ROP baseline inspection program requirement for the CDBI inspections at sites where the new engineering inspection will be implemented.

The Performance Assessment Branch (IPAB) noted how valuable stakeholder feedback has been to the ROP since its inception and that they are looking for ways to improve the ROP feedback process. IPAB is planning to hold a public meeting in January to discuss and identify additional avenues for obtaining feedback from external stakeholders on the effectiveness of the ROP and potential improvements.

The staff briefed the status of the revision to IMC 0305, "Operating Reactor Assessment Program". The most significant change is to the definition of "repetitive degraded cornerstone" from being a cornerstone that is degraded for more than four consecutive quarters to one that is degraded for more than five consecutive quarters. This proposal will allow licensees additional time to prepare for the complex supplemental inspection, and for the Regions to schedule and

complete the inspection, to better inform a decision to move a licensee from Column 3 to Column 4.

The staff also discussed the status of activities regarding the review of the ROP Action Matrix criteria, specifically the criteria for a licensee to transition to Column 3. After having developed a technical basis, the staff is moving forward with a recommendation to eliminate the criterion for two white inputs in the same cornerstone transitioning a licensee to Column 3 of the Action Matrix. After NRC management alignment and further public engagement the staff will draft a Commission paper on this topic.

Over the next eight months, NRC staff plans to have several Category 2 public meetings to revise IMC 0609, Appendix L, "B.5.b Significance Determination Process" and IMC 0308, Attachment 3, Appendix L, "Technical Basis or the B.5.b Significance Determination Process (SDP)" to incorporate the additional oversight of mitigating strategies to comply with Order EA-12-51. The significant revisions to the guidance documents will continue to be risk-informed and the thresholds (i.e., SDP color bands) will be based on a quantitative assessment to the extent practicable. In addition, Regulatory Issue Summary (RIS) 2008-015, "NRC Staff Position on Crediting Mitigating Strategies Implemented in Response to Security Orders in Risk-Informed Licensing Actions and in the Significance Determination Process", will be reviewed to determine if the guidance needs to be revised, and if so, whether a new RIS should be issued.

The staff is in the process of incorporating enhancements to the SDP guidance documents based on recommendations from an internal working group effort (ML14318A512) and the Staff Requirements Memoranda (SRM) in response to COMSECY 14-0030, "Proposed Suspension of the Reactor Oversight Process Self – Assessment for Calendar Year 2014". The purpose of the enhancements is to improve the timeliness of final staff decisions involving the safety or security significance of inspection findings and to improve internal communication, coordination, and efficiency. The staff is currently revising applicable SDP guidance documents and plans to share the draft revisions at a future public meeting.

In the area of the PI program, staff and industry addressed the following items:

- (1) The staff notified industry that all PI data submittals for the third quarter of 2014 were completed on time. The staff also mentioned that licensees should provide complete PI data in their submittals. The staff recommended that the licensees use conservative assumptions for instances in which an event determination is needed for PI reporting, but cannot be completed prior to submitting the PI data. The staff acknowledged that the licensee can submit a change file or use the FAQ process, as applicable, to revise the PI data if needed.
- (2) The staff discussed the status of the unplanned power changes PI for Fitzpatrick. This PI reflects an elevated number of unplanned power changes due to main condenser tube leakage. The licensee plans to correct this condition during their current outage. The staff is considering various alternatives for treating this PI in the near future: (1) maintaining the PI white until it naturally returns to the green band over the course of the next quarters, (2) graying out the PI until it returns to the green band, (3) updating the PI data to remove those unplanned power changes resulting from the previous main condenser leakage, in order to prevent masking of other unplanned power changes in

- the results of this indicator. Industry representatives indicated that the option of revising prior PI data should be further discussed if the NRC staff intends to implement it.
- (3) The staff discussed the Watts Bar Nuclear Plant Unit 2 transition plan into the ROP with regards to PI validity. The staff discussed the Unplanned Scrams and Mitigating System Performance Index (MSPI) PIs. The staff proposed that the Unplanned Scrams PI become valid after 2,400 critical hours have been accrued, and that the MSPI PIs become valid at least 4 quarters after the start of operations. Industry representatives recommended modifying the white/yellow threshold for the Unplanned Scrams PI when making the PI valid. Industry representatives also mentioned that the validity of the MSPI PIs would be limited by the plant's PRA, and it should be taken into consideration once developed.
 - (4) The staff mentioned that industry representatives should submit a generic FAQ to follow up on a white paper on the definition of initial transients that was previously vetted in the ROP WG public meeting forum.

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

- FAQ 14-02: This FAQ is tentative final. This is a site-specific FAQ developed by Fort Calhoun Station (FCS) to address the validity of MSPI as a result of an extended shutdown. FCS predicted future MSPI values using a Pressurized Water Reactor Owners Group "What-if" tool and expected plant data. The staff recommended and industry representatives agreed that the high pressure injection system MSPI, heat removal system MSPI and cooling water system MSPI become valid on the 4th quarter of 2014, and the Emergency AC power and residual heat removal system components of the MSPI become valid on the 1st quarter of 2015. The staff expects this FAQ to become final during the next ROP WG public meeting.
- FAQ 14-03: This FAQ is tentative final. This is a site-specific FAQ for Arkansas Nuclear One (ANO), Unit 2. This FAQ addresses the Unplanned Scrams with Complications PI guidance on the flowchart question regarding the status of main feedwater (MFW) availability after the scram. Specifically, ANO proposed that because of the unique design of their feedwater system, the intention of the flowchart question regarding the availability of feedwater is met and that the scram should not be considered complicated. ANO provided additional information about the design of their feedwater system and the procedures to recover main feedwater with loss of condenser vacuum during this meeting. The staff reviewed the licensee's procedures for restarting MFW without condenser vacuum and agreed that MFW could likely have been recovered within 30 minutes. The staff concluded that this event does not count in the Unplanned Scram with Complications PI. The staff expects this FAQ to become final during the next ROP WG public meeting.
- FAQ 14-05: This FAQ is final. This is a site-specific FAQ for Hatch. This FAQ addresses the validity of the Alert and Notification System PI for Hatch. The licensee proposes to report the results in accordance with NEI 99-02 and enter zeroes for trailing quarters until four quarters of data have accumulated. The NRC agrees with this proposal and with an effective date of 1st quarter of 2015.

- FAQ 14-06: This FAQ was discussed. This is a site-specific FAQ for Vermont Yankee. This FAQ addresses the Unplanned Power Changes per 7,000 Critical Hours performance indicator guidance on identification and response to degrading conditions. The staff recommended withdrawal of this FAQ because it would not be resolved prior to the permanent shutdown of Vermont Yankee.
- FAQ 14-07: This FAQ is tentative final. This is a site-specific FAQ for Point Beach Nuclear Plant (PBNP). This FAQ addresses NEI 99-02 site-specific guidance on PBNP's reporting of Alert and Notification System Reliability PI data. The licensee proposes to revise NEI 99-02 to reflect that PBNP will be taking responsibility of siren maintenance and operation from Kewaunee for the remaining sirens in the area of overlap of Emergency Planning Zones between the respective sites, once such transition is completed and the Federal Emergency Management Agency (FEMA) approves the updated design. The NRC staff agrees with the proposed resolution and expects this FAQ to become final during the next ROP WG public meeting.
- FAQ 14-08: This FAQ was introduced. This is a site-specific FAQ for Prairie Island. This FAQ addresses a diesel generator failure counted under the Emergency AC MSPI. The licensee proposes to retract a diesel generator failure because it resulted from a reverse power condition that would not occur while the diesel generator is performing its monitored function and it is not indicative of the reliability of the equipment. The NRC staff will review the information provided during this meeting and will provide a response or additional questions on the event during the next ROP WG public meeting.

A public tele-conference will be held on December 11, 2014, to discuss FAQs. The next ROP WG public meeting is scheduled to be held on January 15, 2015.

Enclosures:

Attendance List – November 19, 2014

Handouts Discussed in the November 19, 2014

ROP WG Public Meeting

Reactor Oversight Process Task Force FAQ Log

November 19, 2014

ROP Working Group Action Items Tracking Log

November 19, 2014

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ADAMS ACCESSION NO: ML14349A084

ADAMS Package No. ML14349A086

***concurred via email**

OFFICE	NRR/DIRS/IPAB	BC: NRR/DRA/APHB	NRR/DIRS/IRIB	BC:NRR/DIRS/IPAB
NAME	AWaugh	SWong*	CRegan*	NSanfilippo
DATE	12/11/14	12/15/14	12/15/14	12/17/14

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
November 19, 2014**

Nathan Sanfilippo	NRC
Dan Merzke	NRC
Andrew Waugh	NRC
Luis Cruz	NRC
Eric Powell	NRC
Aron Lewin	NRC
Steve Vaughn	NRC
Chase Franklin	NRC
Alonzo Richardson	NRC
Ron Frahm	NRC
James Isom	NRC
Chris Regan	NRC
Juan Peralta	NRC
Bill Cartwright	NRC
John Thompson	NRC
Eric Thomas	NRC
Lynn Mrowca	NRC
Eric Ruesch	NRC
Christine Lipa	NRC
Jim Slider	NEI
Larry Parker	STARS Alliance
Adrienne Driver	Duke Energy
Bruce Mrowca	ISC
Suzanne Leblang	Entergy
Lenny Sueper	Xcel Energy
Sarah Zafar	Erin Engineering
Elijah DeV Vaughn	Southern Nuclear
Shirelle Allen	Duke Energy
Jim Armstrong	Exelon
Roy Linthicum	Exelon
Beth Wetzel	TVA
Justin Wearne	PSEG
Deann Raleigh	Scientech
Kathy Forte	Beckman and Associates
Shannon Poindexter	Beckman and Associates
Brianna Delmastro	Beckman and Associates
Ken Heffner*	Certrec
Steve Catron*	NextEra Energy
Carlos Cisco*	Winston
Ron Gaston*	Exelon
Gary Miller*	Dominion
Victoria Anderson*	NEI
Bill Ketchum*	
Joshua Beckman*	

*participated via teleconference and/or online meeting