



# Industry Concerns

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# Industry Concerns

Licensee OPC project teams are actively pursuing development of a plant design to resolve the open phase issue. In doing that, there is a need for technical guidance. Here is the current published basis for industry design efforts:

- The NEI OPC Initiative was issued in Fall 2013 followed closely by the NEI OPC Guidance Document.
  - Neither of these documents have received any kind of written endorsement related to the adequacy or acceptability of the technical aspects.
- The Draft Branch Technical Position (BTP) issued in 2014.
  - Numerous substantial comments were provided that have the potential to significantly alter the technical details and requirements.
  - The BTP should provide the needed technical guidance, but will not be issued until later this year.
- The November 25 letter provided some technical details, but because of some significant differences from the Draft BTP, the letter solidified or expanded the need for clarification in several technical areas.
- Stations are being squeezed between waiting to get the detail technical requirements they would need to develop a design in agreement with NRC expectations and developing outage modification package completion milestones required to meet the NEI OPC Initiative completion dates.
  - Many stations are moving forward under the initiative technical guidance, but at risk related to future site inspections under a BTP with different technical guidance. Inspection difficulties would affect both the station and the NRC future workload.
  - Many stations are moving slowly or waiting on final, published technical guidance conveying NRC expectations to prevent false design starts on outage modification packages. Waiting will delay completion and closing of the OP issue for both the station and the NRC.

# Questions