

January 23, 2015

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

FROM: Daniel J. Merzke, Senior Reactor Operations Engineer */RA/*
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE PUBLIC MEETING TO SOLICIT PUBLIC
COMMENT ON NRC STAFF RECOMMENDATIONS TO REVISE THE
REACTOR OVERSIGHT PROCESS ACTION MATRIX CRITERIA FOR
THE DEGRADED CORNERSTONE COLUMN

On January 15, 2015, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with members of the Nuclear Energy Institute (NEI), other industry representatives, and the public to solicit comments on the NRC staff recommendations to revise the Reactor Oversight Process (ROP) Action Matrix criteria for the Degraded Cornerstone column. This meeting was conducted as part of the assessment program component of the ROP Enhancement Project. Enclosure 1 contains the meeting attendance list; Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15021A355) contains the meeting slides discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML15021A374) contains the report on the recommendations discussed during the meeting; and Enclosure 4 (ADAMS Accession No. ML15021A392) contains the data that the NRC staff reviewed.

In response to industry comments at a public meeting to discuss the scope of the ROP Enhancement Project, held on November 21, 2013 (ADAMS Accession No. ML13337A637), and a recommendation from the ROP Independent Assessment Report (ADAMS Accession No. ML14035A571), the NRC staff formed a working group to review the criteria for licensees to transition to Column 3 of the Action Matrix. Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," describes the Action Matrix. Column 3 of the Action Matrix is also known as the Degraded Cornerstone, defined to be all cornerstone objectives met with a moderate degradation in safety performance.

The staff provided a briefing on the recommendation from the working group to eliminate the criterion of two White inputs in the same cornerstone to transition a licensee to Column 3 of the ROP Action Matrix, and the basis for the recommendation. The staff solicited comments and questions from participants. Comments were generally supportive of the recommendation. Industry commented that the proposal was responsive to the recommendation made in the ROP Independent Assessment Report and the industry white paper (ML14246A465) provided to the staff in August 2014. Industry reiterated that the other criteria for transition to Column 3 was still

applicable (one Yellow input, or three White inputs in the same Strategic Performance Area), and that an additional White finding in the same cornerstone would still be subject to regulatory oversight through Inspection Procedure (IP) 95001, "Supplemental Inspection for One or Two White Inputs in a Strategic Performance Area." A representative of Platts asked if the draft SECY paper, which will be developed to provide the recommendation to the Commission, would be available for public comment. The staff informed him that providing draft SECY papers for public comment was not standard practice, and that this public meeting was the forum for soliciting comments from the public. One caller asked if the staff had considered unintended consequences, specifically to the criteria for transition to Column 4 of the Action Matrix. Staff committed to reviewing the definition and criteria for transition to Column 4. Additional questions were raised concerning the timeline for implementation after a Commission decision, and what changes to IP 95001 might be expected. Staff responded that IP 95001 would need to be revised to provide a range for the resource estimate to provide additional flexibility for inspecting two White inputs in the same cornerstone, and additional guidance would be necessary to review a licensee's common cause analysis.

The staff briefed that the next steps in the process were to achieve alignment with the Regional offices by the end of January 2015, and to complete the SECY paper for delivery to the Commission around April 30, 2015.

Enclosures:

1. Attendance List – January 15, 2015
2. Meeting Slides – January 15, 2015
3. Report on Recommended Revision to Criteria for Transition to Column 3
4. Data for Licensees Transitioning to Column 3 of the Action Matrix

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**PUBLIC MEETING TO DISCUSS THE NRC STAFF RECOMMENDATION TO REVISE THE
CRITERIA FOR TRANSITION TO COLUMN 3 OF THE ROP ACTION MATRIX
ATTENDANCE LIST
January 15, 2015**

Daniel Merzke	NRC
Scott Morris	NRC
Allen Howe	NRC
Nathan Sanfilippo	NRC
Ronald Frahm	NRC
Eric Powell	NRC
Andrew Waugh	NRC
Raymond Powell	NRC
Luis Cruz	NRC
Mary Anderson	NRC
Zachary Hollcraft	NRC
Chase Franklin	NRC
See-Meng Wong	NRC
Antonios Zoulis	NRC
Juan Peralta	NRC
Scott Sullivan	NRC
Reinaldo Rodriguez*	NRC
Anne Marie Stone*	NRC
Jim Slider	NEI
Larry Parker	STARS
Suzanne Leblang	Entergy
Deann Raleigh	Scientech
Lenny Sueper	Xcel Energy
Adrienne Driver	Duke
Cecil Fletcher	Duke
Ron Gaston	Exelon
Lee Grzeck	Duke
David Mannai	Entergy
Brian McCabe	Duke
Jim Petro	NextEra
Robin Ritzman	First Energy
Owen Scott	Southern Nuclear
Pete Wilson	TVA
Tony Zimmerman	Duke
Mark Anderson	Conger-Elsea
Steven Dolley*	Platts
Gary Miller*	Dominion
Mike O'Keefe*	Certrec
Mike Murray*	South Texas Project
Bruce Montgomery*	Exelon
Gary Sanders*	TVA

*participated via teleconference