

February 9, 2015

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 JANUARY 15, 2015

On January 15, 2015, 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; and Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15034A350) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting. Meeting attendees discussed topics related to probabilistic risk assessment (PRA), assessment, and performance indicators (PIs).

The PRA Operations and Human Factors Branch (APHB) staff informed meeting participants of a Category 2 NRC Public Meeting to discuss the development of a Significance Determination Process (SDP) tool to assess the significance of issues related to Mitigating Strategies. This public meeting is scheduled on January 29, 2015. The NRC also plans to hold a public meeting in February to discuss modeling the safety significance of inspection findings that cause initiating event occurrences.

In response to industry interest on how to update the quality of Standardized Plant Analysis Risk (SPAR) models used in SDP assessments, the staff will send NEI the written process that licensees should be using to perform these updates. Given the industry interest on this subject, APHB staff indicated that the Office of Nuclear Regulatory Research has plans for holding a public workshop in summer 2015 to discuss details of the SPAR model program and its quality assurance aspects. NRC will inform the ROP WG of this workshop as soon as a date is finalized.

NEI requested that a FAQ process be implemented for questions on NUREG-1022. The NRC indicated that it would take this request into consideration, but did express concerns regarding using a FAQ process to address matters related to regulatory requirements.

The Reactor Inspection Branch (IRIB) staff discussed the results of a NRC study performed to determine the causes for the variance of very low (Green) safety significance findings between the regions. The study showed that inspectors who are primarily trained in their regions may

have interpreted the agency's written and approved procedures differently with regard to screening and documenting findings of very low safety significance. The staff indicated that the NRC would be enhancing procedures and conducting training in order to improve objectivity and predictability in this area.

The Performance Assessment Branch (IPAB) noted that there are currently efforts underway to update the ROP webpages and to improve the ROP feedback process. The staff will keep the WG up to date on how these efforts progress. The IPAB staff also informed meeting participants that the Regulatory Information Conference (RIC) will be held March 10-12, 2015, at the Bethesda North Marriott Hotel and Conference Center. Registration for the RIC can be done through the NRC public website.

The IPAB staff also mentioned that they are looking into how new reactors will be handled in the ROP. Some of the things that are being considered are which current PIs and inspections will be valid, and what new or revised PIs and inspections will be required. This project is scheduled to be completed about one year prior to any new reactor coming online. Staff will hold a kick-off public meeting in the coming months.

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

- (1) The staff reminded industry representatives that the PI data for the fourth quarter of 2014 was due on January 21st, 2015.
- (2) The staff discussed the status of the unplanned power changes PI for Fitzpatrick. The staff indicated that the PI would remain White until it naturally returns to the Green band over the course of the next quarters.
- (3) The staff discussed the status of the Watts Bar Nuclear Plant 2 transition plan into the ROP with regards to performance indicator validity. The staff indicated that it is currently discussing, both internally and with the licensee, the approach for making the Mitigating System Performance Index (MSPI), Unplanned Scrams per 7,000 Critical Hours, and Unplanned Power Changes per 7,000 Critical Hours PIs valid.
- (4) The staff discussed the need for updating the archive files for approved FAQs. The staff will work with NEI to update the approved FAQ archives and establish a process for storing future approved FAQs.

Staff and industry discussed the following PI FAQs (see Enclosure 2):

- FAQ 14-08: This FAQ was not discussed. 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 provided a set of questions about this event to the licensee in preparation for the December 2014 ROP WG public meeting. The licensee plans to provide response to these questions during the next ROP WG public meeting.
- FAQ 14-09: This FAQ is tentative final. This is a site-specific FAQ for Arkansas Nuclear One (ANO) Unit 2. This FAQ addresses the Unplanned Scrams PI guidance on anticipatory plant shutdowns intended to reduce the impact of external events. This

FAQ discusses an unintended automatic scram that resulted from the reactor exceeding the Axial Shape Index (ASI) operation limit during a rapid shutdown evolution. The licensee proposes that ASI transients are unavoidable when performing rapid plant shutdowns near the end of core life, and such was the case for ANO 2. The licensee also indicated that the grid operator requested that both ANO units be immediately taken offline, and a very slow power descent would not support the grid operator request. The NRC staff reviewed the information provided by the licensee in the FAQ and the corresponding licensee event report and concluded that this event should count as an unplanned scram. The licensee provided comments on the staff's response. The staff will revise the FAQ response accordingly and expects to approve this FAQ as final during the next ROP WG public meeting.

- FAQ 14-10: This FAQ was introduced. This is a site-specific FAQ for Indian Point Units 2 and 3. This FAQ requests guidance on the data reporting for the Protected Area Equipment PI. The licensee proposes to maintain two separate indicators for Unit 2 and Unit 3, but to use the same value for both Units starting early 2015. The NRC staff reviewed the information provided by the licensee and provided comments on the licensee's approach. The staff is aligned with the licensee's proposed treatment for future Protected Area Equipment PI data at this site and expects to provide a response to this FAQ during the next ROP public meeting.

A public tele-conference will be held on February 19, 2015, to discuss FAQs. The next ROP WG public meeting is scheduled to be held on March 18, 2015.

Enclosures:

Attendance List – January 15, 2015

Reactor Oversight Process Task Force FAQ Log

January 15, 2015

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January 15, 2015

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| OFFICE | NRN/DIRS/IPAB | BC: NRN/DRA/APHB | NRN/DIRS/IRIB | BC:NRN/DIRS/IPAB |
|--------|---------------|------------------|---------------|------------------|
| NAME | AWaugh | SWong* | CRegan* | NSanfilippo |
| DATE | 2/2/15 | 2/2/15 | 2/3/15 | 2/6/15 |

OFFICIAL RECORD COPY

**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
January 15, 2015**

| | |
|-------------------|------------------|
| Nathan Sanfilippo | NRC |
| Dan Merzke | NRC |
| Andrew Waugh | NRC |
| Luis Cruz | NRC |
| Mary Anderson | NRC |
| Eric Powell | NRC |
| Aron Lewin | NRC |
| Chase Franklin | NRC |
| Ron Frahm | NRC |
| Zack Hollcraft | NRC |
| See-Meng Wong | NRC |
| Chris Regan | NRC |
| Juan Peralta | NRC |
| Scott Morris | NRC |
| Sunil Weerakkody | NRC |
| Nicholas McMurray | NRC |
| Ray Powell | NRC |
| Steve Vaughn* | NRC |
| Jim Slider | NEI |
| Larry Parker | STARS Alliance |
| Tony Zimmerman | Duke Energy |
| Adrienne Driver | Duke Energy |
| Cecil Fletcher | Duke Energy |
| Brian McCabe | Duke Energy |
| Lee Grzeck | Duke Energy |
| Suzanne Leblang | Entergy |
| David Mannai | Entergy |
| Lenny Sueper | Xcel Energy |
| Owen Scott | Southern Nuclear |
| Ron Gaston | Exelon |
| Pete Wilson | TVA |
| Robin Ritzman | First Energy |
| Doug Rapp | First Energy |
| Jim Petro | NextEra Energy |
| Mark Anderson | Conger-Elsea |
| Deann Raleigh | Scientech |
| Ken Heffner* | Certrec |
| Roy Linthicum* | Exelon |
| Carlos Cisco* | Winston |
| Gary Miller* | Dominion |
| Dave Kline* | |
| Nicholas Hansing* | |
| Anthony Mohen* | |
| Ashley Thomas* | |
| Nicholas Savnair* | |

*participated via teleconference and/or online meeting