

August 12, 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 JULY 15, 2015

On July 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. ML15211A147) contains the white papers and handouts discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML15211A172) 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 Security Training and Support Branch (STSB) staff from the Office of Nuclear Security and Incident Response indicated they are modifying Inspection Manual Chapter 0609, Appendix E, "Part I, Security Significance Determination Process (SDP) for Power Reactors." The majority of changes being made are related to unattended openings such as underground tunnels/pipes and target set findings. Several staff members met with the NEI security staff earlier this month and shared the final proposed changes and requested they provide the NRC any comments no later than July 17, 2015, so that they can be factored into the final version of the SDP enhancement. The STSB staff also discussed that a WG has been formed to perform a lessons learned evaluation on the Force-on-Force program. The staff expects to issue a revised procedure for the Force-on-Force program in October 2015.

The Division of Risk Assessment (DRA) staff informed meeting participants that the NRC was holding a public workshop on July 14th and 15th, 2015, on the Standardized Plant Analysis Risk model program and its quality assurance aspects.

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The DRA staff also discussed the NRC's internal process for handling revisions to the Risk Assessment Standardization Project (RASP) Handbook, including details on the rigorous reviews by the NRC staff and management before issuing a new revision of the RASP Handbook for use. Although the RASP Handbook revision process does not purposefully seek external stakeholders' review, the NRC will inform external stakeholders about changes being considered to the RASP Handbook during ROP WG public meetings.

The Reactor Inspection Branch (IRIB) staff discussed the final report associated with Temporary Instruction (TI) 2515/186, "Inspection of Procedures and Processes for Responding to Potential Aircraft Threats" (ML15163A252). Discussion included reiterating some of the regulatory requirements associated with Title 10 of the Code of Federal Regulations (10 CFR) 50.54(hh)(1) as outlined in the July ROP public meeting notice attachment (ML15176A925). The NRC stated that additional information on 10 CFR 50.54(hh)(1) can be found in Regulatory Guide 1.214 (ML14002A098). The NRC indicated that issues identified as a result of TI performance will be forwarded to the regional offices for disposition. The NRC also indicated that the focus of any NRC follow-up will be to ensure that identified issues are being appropriately addressed via the licensee's corrective action program.

The IRIB staff discussed a draft version of the Component Design Basis Inspection (CDBI) inspection procedure developed to address concerns raised by the industry that the current version of the CDBI places undue regulatory burden on site engineering staff. The draft pilot of the CDBI will be performed in two parts, one inspection will be a 2-week component design review based on current procedures, and the second inspection will be a 1-week program implementation inspection. The new draft CDBI inspection procedure will be piloted at 8 sites between November 2015 and June 2016. The pilot plants are:

Region I: Calvert Cliffs and Fitzpatrick

Region II: Browns Ferry and St. Lucie

Region III: D.C. Cook and Dresden

Region IV: South Texas Project and Columbia Generating Station

The NRC plans to incorporate lessons learned from the pilot plant inspections and develop a revised CDBI inspection procedure(s) to be implemented at all licensees starting calendar year 2017.

The Performance Assessment Branch (IPAB) staff discussed proposed approaches for the development of the ROP for new reactors. The NRC is looking to hold a more substantive discussion on this topic at the September 16, 2015, ROP WG public meeting. The staff indicated that at this September 16th meeting, the NRC is looking to interact with industry and interested stakeholders to help define the scope of the project and determine some of the potential issues and challenges that need to be considered going forward.

The IPAB staff also discussed NRC activities to streamline the SDP based on recommendations from the ROP Independent Assessment, the SDP Business Process Improvement, and Commission direction. In addition, the NRC staff generally view the current SDP as having become a more risk-based process, rather than risk-informed as it was originally designed when the ROP began. Staff commented that the SDP could improve in its timeliness and in the resources expended to make a regulatory decision on licensee performance deficiencies.

IPAB staff indicated that the NRC continues to have internal dialogue on the matter with an objective of reaching consensus on a path forward for possible SDP program changes as early as fall 2015. Industry representatives commented that the change to a more risk-informed process using less resources and reducing time for final SDP was needed, but added that the industry would like to engage early as the NRC attempts to define needed changes.

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

- (1) Industry presented a white paper (Enclosure 2) to add detail on what constitutes an appropriate Emergency Response Organization Participation PI credit opportunity for a hostile action based drill or exercise. The white paper had been revised from the one presented at the June 2015 ROP WG public meeting to reflect comments made by the NRC staff. The NRC staff agreed with the changes made to the white paper and the next step will be for industry to turn this white paper into an FAQ and present it at a future ROP WG public meeting.

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

- FAQ 15-02: This FAQ was discussed. This generic FAQ requests guidance on the Unplanned Power Changes per 7,000 Critical Hours PI. The licensee is looking for further clarification on what constitutes the discovery of an off-normal condition, since there is a required 72-hour period between discovery and power reduction in order for the power change to not count as an Unplanned Power Change per NEI 99-02. The NRC staff requested some additional information from the licensee and expects to provide a response to this FAQ during the next ROP public meeting.
- FAQ 15-03: This FAQ was discussed. This generic FAQ was introduced in the June meeting to evaluate whether or not low risk worth trains could be excluded from monitoring. The NRC staff discussed initial questions with the industry during this meeting and will solicit regional staff responses to the FAQ and return to the September meeting with any further questions or concerns.

The next ROP WG public meeting is scheduled to be held on September 16, 2015.

Enclosures:

1. Attendance List
2. Handouts Discussed
3. FAQ Log

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ADAMS ACCESSION NO: ML15211A130 ADAMS Package No. ML15211A126

***concurred via email**

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

Dated: August 12, 2015

Nathan Sanfilippo	NRC
Chris Regan	NRC
Dan Merzke	NRC
Andrew Waugh	NRC
Zack Hollcraft	NRC
Chase Franklin	NRC
Alonzo Richardson	NRC
Russell Gibbs	NRC
Aron Lewin	NRC
Jo Bridge	NRC
Ron Frahm	NRC
See Meng Wong	NRC
Eric Schrader	NRC
James Isom	NRC
Luis Cruz	NRC
Lynn Mrowca*	NRC
Thomas Kozak*	NRC
Caroline Tilton	NRC
Irene Cuarental	CSN
James Slider	NEI
Chris Earls	NEI
Thomas Zachariah	NEI
Larry Parker	STARS Alliance
Ryan Treadway	Duke Energy
Adrienne Driver	Duke Energy
Suzanne Leblang	Entergy
Lenny Sueper	Xcel Energy
Fred Mashburn	TVA
James Pak	Dominion
Robin Ritzman	First Energy
Roy Linthicum	Exelon
James Landale	Exelon
Ron Gaston	Exelon
Steve Catron	NextEra Energy
Deann Raleigh	Scientech
Ken Heffner	Certrec
Carlos Cisco *	Winston
Bill Cachum*	Wolf Creek

*participated via teleconference and/or online meeting