

## U.S. Nuclear Regulatory Commission Public Meeting Summary

September 25, 2015

**Title:** Discussion on the Petition for Rulemaking Related to 10 CFR 50.69, Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors

**Meeting Identifier:** 20151265

**Date of Meeting:** September 16, 2015, 01:00 PM to 03:00 PM

**Location:** NRC Two White Flint North, T-2B3 11545 Rockville Pike Rockville, MD

**Type of Meeting:** Category 3

**Purpose of the Meeting(s):** The purpose of this meeting was to facilitate discussions between the NRC and members of the public related to the petition for rulemaking sent in by the Nuclear Energy Institute (NEI). The NRC attempted to better understand the benefits of undertaking this rulemaking.

**Summary of Presentations:** After a short introduction by participants in the room and on the phone, the petitioner, NEI, opened with a brief presentation. The presentation lasted approximately 10 minutes and is attached to this meeting summary. The presentation allowed the NRC staff and public to better understand the justifications provided by the petitioner related to the rulemaking request. The petitioner explained that the main objective of the petition for rulemaking (PRM) is to allow part 52 license holders to utilize the 10 CFR part 50.69 process. The utilization of this process is available to plants in operation licensed under part 50, but is not available to part 52 licensees.

**Public Participation Themes:** Once the presentation was complete, the NRC staff asked questions and asked for clarification on certain issues. Some of these points related to applicability of the rulemaking. At this time there are three sites with a total of five units licensed under Part 52. The staff was interested in understanding how many of the sites would be interested in this as an option. Representatives from all but one new reactor site were in attendance at the meeting. All in attendance expressed interest in using 50.69 at some point during their license.

The staff and industry asked and responded to questions based on ideal timing and potential issues related to ITAAC. The NRC then opened up the meeting to questions from those on the phone. Environmentalists, Inc. made comments related to the timing of this petition and how the associated actions could add further complications to the process. They also noted the cost and resource use from the NRC and asked to understand that in relation to the benefits.

Some dialog ensued between the staff and members of the public and near the end of the meeting a potential miscommunication was uncovered. 10 CFR 50.69 applies to COL applicants, but not COL holders in its current form. The staff pointed out that a COL applicant could have 50.69 added to their licensing basis and that would persist through when they had a license. This miscommunication might be the subject of a generic communication in the near future to ensure both staff and industry are on the same page with the interpretation of 10 CFR 50.69.

The meeting itself ran from approximately 01:00 PM to after 03:00 PM, essentially taking the entire two hours set aside for discussion. There were twelve people present in the room with another seven participating over the phone.

**Next Steps:** The staff determination if this PRM should be denied or added to the rulemaking process.

Attendees:

<b><u>Name</u></b>	<b><u>Organization</u></b>
Rollie Berry	NRC
Mark Caruso	NRC
Kimyata Morgan Butler	NRC
Lynn Mrawca	NRC
Thomas Zachariah	Nuclear Energy Institute (NEI)
Owen Scott	Southern Nuclear Company (SNC)
Patrick O'Regan	Electric Power Research Institute (EPRI)
Geary Mizuno	NRC
Gerald Loignon	South Carolina Electric and Gas (SCE&G)
Kelli Roberts	SNC
Donnie Harrison	NRC
Findlay Salter	SCE&G
Ogden Sawyer	AREVA
Rob Burg	Engineering Planning and Management (EPM)
Rocky Kreider	EPM
Tim Dodson	EPM
Vesna Dimitrijevic	AREVA
Sheldon Clark	NRC
Ruth Thomas	Environmentalists, Inc.