

October 8, 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 SEPTEMBER 16, 2015

On September 16, 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. ML15280A340) contains the white papers and handouts discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML15280A356) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting. Meeting attendees discussed topics related to probabilistic risk assessment (PRA), licensee performance assessment, and performance indicators (PIs).

The Security Training and Support Branch (STSB) staff from the Office of Nuclear Security and Incident Response (NSIR) has completed a comprehensive review of Inspection Manual Chapter 0609 Appendix E, "Part I, Security Significance Determination Process (SDP) for Power Reactors." The first change involves a revised screening process for unattended opening findings such as underground pathways and tunnels. The staff believes that this change will provide a more predictable and repeatable tool, using a graded approach, while staying consistent with the basic principles of physical security. This SDP change is expected to be published in the October 2015 timeframe. The staff indicated that they are working on additional changes to the SDP to include findings related to target sets and safeguard information protection.

The Division of Risk Assessment (DRA) staff updated meeting participants on the status of revisions to IMC 0308, Attachment 3, "Significance Determination Process." The current revisions to IMC 0308, Attachment 3 were designed to put the philosophy and position on the appropriate approach to use the incremental conditional core damage probability metric for addressing performance deficiencies that caused Initiating Events in plain language.

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The draft of this new revision will be distributed to NRC staff and management for a 30-day comment period by the end of September 2015. After the comment period, NRC staff will make appropriate changes and/or clarifications to the Risk Assessment Standardization Project (RASP) Handbook, Volume 1, Section 8 to gain alignment with the language in the revised IMC 0308 attachment. Before the end of calendar year 2015, NRC staff plans to have a public meeting to communicate clarifications on the revised IMC 0308, Attachment 3 and the RASP Handbook.

The Reactor Inspection Branch (IRIB) staff discussed that they are in the process of enhancing Inspection Procedure (IP) 71152, "Problem Identification and Resolution." NRC staff will begin engaging the public on this initiative in the first quarter of 2016 and the enhancements to IP 71152 are expected to be published in the mid 2016 timeframe.

The IRIB staff discussed that they are currently working on incorporating regional comments into IP 71111.21, "Component Design Basis Inspection," and that the revised pilot inspection procedures will be ready for use by the end of September 2015. The IRIB staff will be working with NEI to better understand and resolve the feedback received on the pilot Environmental Qualification program (see Enclosure 2).

The Performance Assessment Branch (IPAB) staff discussed proposed approaches for developing the ROP for new reactors (ADAMS Accession No. ML15257A067). The staff discussed the scope of considerations moving forward, and presented a structures, systems, and components (SSC) performance verification matrix concept to capture the main SSCs unique to new reactors to ensure that they are adequately addressed by PIs, inspection, and/or the SDP. Industry representatives shared perspectives and ideas, including a recommendation to reference the plant updated final safety analysis reports when developing the SSCs performance verification matrix. Staff also discussed initial thoughts on potential PI changes for new reactors, including the need to review the basis documents that established the mitigating systems performance index and associated performance limits. Staff noted its plans to further these activities, and asked that industry and other stakeholders do the same in preparation for the next discussion with external stakeholders which will coincide with the January 2016 ROP WG meeting.

The IPAB staff discussed the status of several SDP guidance documents/initiatives. Specifically:

- IMC 0609, Appendix O, "Post Fukushima Mitigating Strategies SDP," is expected to be issued in January 2016. The industry requested discussion of this new SDP during a future ROP public meeting, which has been planned for November 2015.
- IMC 0609, Appendix M, "SDP Using Qualitative Criteria," is being revised to improve its objectivity and repeatability. A draft version for public discussion is expected to be completed in the first quarter of 2016.
- IMC 0609, Appendix N, "Independent Spent Fuel Installation Facility SDP," is expected to be issued following the changes to the enforcement policy. The staff plans to hold a spent fuel regulatory conference in November 2015 to further brief the public on its development.

- The SDP streamlining initiative is ongoing and a public meeting is being scheduled for November 2015. The initiative's objective is to improve the efficiency and effectiveness of the SDP with a pilot being planned for 2016.

In the area of the PI program, staff and industry discussed the following PI FAQs (see Enclosure 3):

- FAQ 15-02: This FAQ was made tentative final. This is a generic FAQ requesting guidance on the Unplanned Power Changes per 7,000 Critical Hours PI. The licensee asked 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 determined that the guidance in NEI 99-02 on the time of discovery of an off-normal condition is adequate as currently written, and in this case, the licensee is correct in determining that a shutdown that occurred in December 2014 does not count towards this PI.
- 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 based on a low Birnbaum value. There are trains or segments that can incur tens, if not hundreds of thousands of unavailability hours and remain Green. It is trains like this that the industry is proposing to be excluded from monitoring. During the two months since the last public meeting DIRS solicited comments from NRC staff in the regions and other divisions, based on their responses, the staff agreed to accept the proposals enclosed in the FAQ and will provide a draft response in the October 2015 public tele-conference.
- FAQ 15-04: This FAQ was introduced by the industry based on discussions of a white paper approved by the ROP Working Group at its July 15, 2015, meeting. The white paper clarified when participation credit is to be given during Hostile Action Based drills and exercises. The staff accepted the paper and intends to discuss it during the October 2015 public tele-conference.

A public tele-conference will be held on October 21, 2015, to discuss FAQs. The next ROP WG public meeting is scheduled to be held on November 17, 2015.

Enclosures:

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

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**\*concurring via email**

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## N. Sanfilippo

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
September 16, 2015**

**Dated: October 08, 2015**

Nathan Sanfilippo	NRC
Chris Regan	NRC
Sunil Weerakkody	NRC
Allen Howe	NRC
Andrew Patz	NRC
Dan Merzke	NRC
Zack Hollcraft	NRC
Russell Gibbs	NRC
Jo Bridge	NRC
Ron Frahm	NRC
Alonzo Richardson	NRC
See Meng Wong	NRC
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James Isom	NRC
Ross Telson	NRC
Gabe Levasseur	NRC
Juan Peralta	NRC
Lynn Mrowca	NRC
Thomas Kozak	NRC
Steve LaVie	NRC
Ayo Ayegbusi	NRC
Ching Ng	NRC
Derek Widmayer	NRC
James Slider	NEI
Bruce Montgomery	NEI
Larry Parker	STARS Alliance
Ryan Treadway	Duke Energy
Adrienne Driver	Duke Energy
Tony Zimmerman	Duke Energy
Suzanne Leblang	Entergy
Lenny Sueper	Xcel Energy
Fred Mashburn	TVA
James Pak	Dominion
Robin Ritzman	First Energy
Roy Linthicum	Exelon
Ron Gaston	Exelon
Darani Reddick	Exelon
Steve Catron	NextEra Energy
Ken Heffner	Certrec
Sarah Zafar	ERIN Engineering

Findlay Salter	SCANA
Lance Sterling	STP
Brian Meadors	Southern Nuclear
Kelli Roberts	Southern Nuclear
Irene Cuarental	CSN
Gerald Loignon	SCE&G
Irene Cuarental	CSN
Carlos Cisco *	Winston

\*participated via teleconference and/or online meeting