

December 11, 2015

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

FROM: Andrew Patz, 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 NOVEMBER 17, 2015

On November 17, 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. Meeting attendees discussed topics related to inspection, assessment, and the Significance Determination Process (SDP).

Enclosure 1 contains the meeting attendance list.

Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15343A163) contains the white papers and handouts discussed during the meeting.

Enclosure 3 (ADAMS Accession No. ML15343A167) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting.

Branch Updates

The Probabilistic Risk Assessment (PRA) Operations and Human Factors Branch (APHB) staff informed industry that Inspection Manual Chapter (IMC) 0308 is being updated to address the long standing "Conditional Core Damage Probability (CCDP) versus Change in Core Damage Frequency (Δ CDF)" issue and transmitted for internal stakeholder comments. APHB also mentioned briefing the NRR senior management about the conclusions and significant comments received from industry during public meetings, and how those were dispositioned. With respect to next steps, APHB informed the participants that the Division of Risk Assessment plans to hold a public meeting in the January 2016 time frame to communicate to industry how their comments were dispositioned.

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The Security Training and Support Branch (STSB) staff from the Office of Nuclear Security and Incident Response has published updates to IMC 0609 Appendix E, "Part I, Security significance Determination Process (SDP) for Power Reactors." This SDP change, published in October, provides a screening process for unattended opening inspection findings such as underground pathways and tunnels. The staff believes that this change will provide a more predictable and repeatable tool while staying consistent with the basic principles of physical security and using a graded approach. STSB is continuing to work on additional changes to the SDP to include findings related to target sets and safeguard information protection.

The Reactor Inspection Branch (IRIB) staff tentatively plans to incorporate Severe Accident Management Guidelines (SAMGs) into the ROP baseline inspection program by the end of 2021. Initial considerations are to inspect SAMGs on a triennial periodicity similar to current oversight of 10 CFR 50.54(hh)(2) requirements (also known as B.5.b). Other considerations include the development of a stand-alone inspection procedure that looks at various beyond design basis requirements. The NRC will continue to engage external stakeholders during the development process.

The Performance Assessment Branch (IPAB) staff discussed the revised format for the ROP self-assessment process as described in IMC 0307, "Reactor Oversight Process Self-Assessment Program." This new self-assessment program deepens the assessment while eliminating several of the repetitive metrics. It also includes a new element that will be used to peer review regional implementation of the ROP to enhance program consistency and accountability. The update was issued in November 2015. The IPAB staff is also planning to issue Appendix O to IMC 0609, "Post-Fukushima Mitigating Strategies." This new appendix to IMC 0609 is being developed to address the requirements of the Mitigating Strategies Order that resulted from lessons learned for the Fukushima Daiichi disaster.

Component Design Basis Inspection (CDBI) Pilot Project

The CDBI pilot project is underway at the Calvert Cliffs and D. C. Cook sites. NRC staff will continue to solicit industry feedback on this topic as the pilots move towards completion.

Problem Identification and Resolution Working Group

IRIB staff presented a draft charter to begin formation of the Problem Identification and Resolution Working Group (PIRWG). This working group is being established in order to evaluate proposed revisions to IP 71152, Identification and Resolution of Problems. The staff plans to complete revisions by July 1, 2016. Meeting slides are included in Enclosure 2.

Frequently Asked Questions

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

- FAQ 15-03: This FAQ is final. This generic FAQ was introduced at the June meeting to evaluate the exclusion of low risk worth trains from monitoring based on a low Birnbaum value. There are trains or segments that can incur hundreds of thousands of unavailability hours and remain Green. Industry proposed excluding trains with these characteristics from monitoring. IPAB solicited comments from NRC staff in the

regions and other divisions. Based on the response, the staff concurs with the recommended changes.

- FAQ 15-04: This FAQ is final. This generic 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 the proposed changes within the FAQ.

Enhancing the Significance Determination Process

NRC staff presented on its current efforts related to the Significance Determination Process (SDP) streamlining activity. The staff's presentation focused on the time and resources expended by the NRC in reaching final significance decisions for licensee performance deficiencies identified in the reactor safety cornerstones. An important topic discussed with the industry was the proposal to introduce a more integrated risk-informed approach to decision-making taking into account other factors in addition to the current use of probabilistic risk information. Causes for delays in reaching final decisions, the trend in increasing NRC resources applied to the SDP, and possible SDP streamlining solutions to improve efficiency were also discussed. Other discussion topics included inspection efficiencies (e.g., use of proximate cause versus root cause) and the need for the NRC, as viewed by the industry and the staff, to re-evaluate the Assessment Process (i.e., treatment of inputs into the Action Matrix). NRC plans to conduct a future public meeting to solicit suggestions from the industry on additional ways to improve the SDP and to discuss a Commission-directed pilot activity on SDP changes planned for 2016. Meeting slides are included in Enclosure 2.

The next ROP WG public meeting is scheduled to be held on January 14, 2016.

Enclosures:

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

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ADAMS ACCESSION NO: ML15343A155

ADAMS Package No. ML15343A137

***concurred via email**

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DATE	12/07/15	12/10/15	12/10/15	12/11/15

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
November 17, 2015**

Nathan Sanfilippo	NRC
Sunil Weerakkody	NRC
Scott Morris	NRC
Allen Howe	NRC
Andrew Patz	NRC
Andrew Waugh	NRC
Zack Hollcraft	NRC
Russell Gibbs	NRC
Jo Bridge	NRC
Ron Frahm	NRC
Ayesha Athar	NRC
Ben Mabbott	NRC
James Isom	NRC
Ross Telson	NRC
Bethany Cecere	NRC
Laura Kozak*	NRC
Marsha Gamberoni*	NRC
Mark King*	NRC
Chris Earls	NEI
Martin Hug	NEI
James Slider	NEI
Ken Heffner*	Certrec
Irene Cuarental	CSN
James Pak*	Dominion
Adrienne Driver	Duke Energy
Tony Zimmerman	Duke Energy
Jeff Hardy	Entergy
David Mannai	Entergy
Ron Gaston	Exelon
Roy Linthicum	Exelon
K. Ray Fine	FirstEnergy
Greg Halnon	FirstEnergy
Doug Rapp	FirstEnergy
Robin Ritzman	FirstEnergy
Bruce Mrowca	ISL
John Giddens	Southern Nuclear
Larry Parker	STARS Alliance
Jason Jennings	Talen Energy
Fred Mashburn	TVA
Peter Wilson	TVA
Carlos Cisco*	Winston
Wendy Brust*	
Tony Mangan*	
Allen Moldenhauer*	
Nicholas Rochford*	

*participated via teleconference and/or online meeting