

May 6, 2016

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 APRIL 13, 2016

On April 13, 2016, 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 Performance Indicator (PI) Frequently Asked Questions (FAQs), the ROP for new reactors, the Significance Determination Process (SDP), and the Problem Identification & Resolution (PI&R) WG.

Enclosure 1 contains the meeting attendance list.

Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16127A335) contains the FAQ Log and the FAQs discussed during the meeting.

Frequently Asked Questions

In the area of the PI program, staff and industry discussed the following PI FAQ (see Enclosure 2):

- FAQ 16-01: This FAQ is considered Final.

Industry and the NRC committed to reviewing the Reactor Coolant System Activity PI with regards to possible issues with load-following units not being able to collect appropriate data using the current guidance. Both parties will present white papers with suggestions to address this issue to the WG at a later date.

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ROP for New Reactors

NRC staff and industry discussed the ROP for new reactors. Industry shared several comments on the draft structures, systems, and components (SSC) performance verification matrix (ML16076A212), and noted their intent to continue reviewing the matrix in detail. The NRC staff plans to make the draft detailed integrated transition implementation plan publicly available prior to the May 2016 ROP public meeting. Both the revised matrix and project plan will be discussed in detail during the May 2016 ROP public meeting.

NEI affirmed their plans to submit a white paper on aspects of the AP1000 operation that could be verified by performance indicator. NRC staff also indicated plans to develop a white paper regarding use of performance indicators for new reactors. During the March meeting, the NRC staff noted its intent to make both the staff and industry white papers publicly available for discussion prior to the May 2016 ROP public meeting. However, after status discussions, the NRC determined these documents will likely not be ready for discussion until the June ROP public meeting.

SDP Streamlining

The NRC provided an update on the activities associated with the SDP streamlining project. The affected draft procedures are ready for issuance to the NRC regions for a 30-day internal review. Once the procedures are reviewed and internal comments incorporated, the NRC will make the documents publicly available to allow review and feedback. The NRC described the changes as primarily affecting NRC internal processes such as improving management oversight and project management of potentially greater than Green inspection findings. Therefore, the NRC does not believe that a pilot activity with external stakeholders is warranted. Moreover, the Commission had directed that a pilot be performed on those changes to the SDP that involved improving the risk-informed aspects of the SDP. Since the component of integrated risk-informed decision-making has been reassigned as a longer term feature of SDP streamlining, an external pilot involving the near-term changes is deemed not necessary. However, an internally focused pilot activity will be implemented until sufficient experience is gained to examine the effectiveness of the changes. The industry participants expressed no objection to this approach during the meeting. The updated procedures should be publicly available for review in the June 2016 timeframe.

The NRC also discussed the development status of Inspection Manual Chapter (IMC) 0609, Appendix O - Post Fukushima Mitigating Strategies SDP (Orders EA-12-049 and EA-12-051). The draft of this document is available in ADAMS at Accession No. ML16055A351. The draft procedure has received an internal review by the NRC's affected internal stakeholders. Since the document has received several substantive comments by NRC staff and the information is informing the ongoing performances of Temporary Instruction 2515/191 and any identified inspection findings and their significance, the NRC has decided to make the draft procedure publicly available. Once the industry has had an opportunity to review the document, the NRC will hold a public meeting to obtain feedback on the procedure.

PI&R WG Workshop Review

The PI&R WG answered questions from the industry regarding the workshop brief presented during the March 17, 2016, ROP Public Meeting (ADAMS Accession No. ML16090A049). The

industry asked multiple questions regarding the purpose for the WG, what tools were considering for inputs into any evaluation of PI&R performance, and potential applications. Other industry concerns regarding possible subjectivity, confusion, and a lack of specifics regarding the background of the issues the WG seeks to address were received.

WG members reinforced the background and purpose articulated in the WG charter (ADAMS Accession No. ML15290A004). Multiple self and independent examinations of the ROP identified issues with the inspection of PI&R implementation by licensees. These can be summarized by the following PI&R enhancement recommendations related to Inspection Procedure (IP) 71152, "Problem Identification and Resolution," which were presented during the ROP Enhancement Project (ADAMS Accession No. ML14017A391) and released to the public in April 2014:

- Clarify and expand inspection guidance and improve focus on inspection of corrective action program implementation
- Improve guidance on how to assess a licensee's corrective action program and how to incorporate the team inspection outcome into the overall licensee assessment
- Resolve differences between the PI&R inspection bases, as listed in IMC 0308, "Reactor Oversight Process Basis Document," and IP 71152

The staff discussed ongoing WG research seeking to identify reliable markers with high correlation to significant PI&R process degradation and sought further insights from industry in connection with its experience in PI&R self-assessment. Industry participants provided several suggestions:

- Review licensees' performance who also had a cross-cutting issue in PI&R
- Consider better training for regional inspectors
- Consider reviewing licensee metrics for PI&R
- Review past times when the NRC has assessed a licensee's Corrective Action Program as inadequate
- Consider incorporating PI&R observations from other inspections

Several questions related to the possible application of a PI&R assessment tool were voiced. Future ways that these changes could be utilized to inform the ROP within current Commission direction are being considered, but not implemented, as a part of Phase 1. The PI&R WG has proposed a change to the charter schedule for approval to NRC management. The final implementation date for phase 1 is recommended to occur in January 2017.

The next ROP WG public meeting is scheduled to be held on May 18, 2016.

Enclosures:

1. Attendance List
2. FAQ Log

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DISTRIBUTION: See Next Page

ADAMS ACCESSION No: ML16127A277

ADAMS Package No.: ML16127A233

*concurring via email

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
APRIL 13, 2016**

Nathan Sanfilippo	NRC
Dori Willis	NRC
Andrew Waugh	NRC
Zack Hollcraft	NRC
Ron Frahm	NRC
See-Meng Wong	NRC
Dan Merzke	NRC
Chase Franklin	NRC
Ayesha Athar	NRC
Joanna Bridge	NRC
Russell Gibbs	NRC
James Isom	NRC
Ann Marie Stone	NRC
Scott Freeman	NRC
James Slider	NEI
Ken Heffner	Certrec
Deann Raleigh	Curtiss-Wright
Steve Mitchell	DC Cook
James Pak	Dominion
Stephanie Hanson	Exelon
Roy Linthicum	Exelon
Larry Parker	STARS Alliance
Drew Hall	VC Summer