

September 7, 2016

MEMORANDUM TO: Sunil Weerakkody, Chief
PRA Operations and Human Factors Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Michael Montecalvo, Reactor Operations Engineer */RA/*
PRA Operations and Human Factors Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 11, 2016 PUBLIC MEETING TO CONTINUE
DISCUSSIONS BETWEEN THE NRC AND INDUSTRY RISK-
INFORMED STEERING COMMITTEES (RISC)

On August 11, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting to continue discussions between the NRC and industry Risk-Informed Steering Committees (RISC). The purpose of the meeting was to engage the industry and public in discussions on risk-informed topics of interest. The meeting notice is available in the Agencywide Documents Access and Management System (ADAMS) Accession Number ML16203A184. The RISCs received an update on the status of the Probabilistic Risk Assessment (PRA) Technical Adequacy Working Group, discussed the continuing actions to update Regulatory Guide (RG) 1.174 "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant Specific Changes to the Licensing Basis", and had a discussion on the path forward for crediting mitigating strategies (MS) in risk-informed decision making (RIDM). The presentations are available in ADAMS Accession Numbers ML16251A239, ML16251A297, ML16251A330, and ML16251A350 respectively in ADAMS Package Accession Number ML16251A229. The industry RISC also led discussions on FLEX as it relates to proposed new language in NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" and fire PRA realism. There were no presentations for those two topics. A list of individuals that participated in the meeting is provided as an enclosure to this document. No public meeting feedback forms were received after the meeting.

The NRC RISC chair welcomed the participants to the meeting, providing the purpose of the meeting and introducing the topics to be covered. The industry RISC chair provided opening comments challenging both RISCs on the original purpose of the committees and whether or not we were meeting the goals that were set out to achieve. He reflected that both NRC and industry have many initiatives underway and that these committees should be used to guide those initiatives and committed to providing a comprehensive list for discussion at the next

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meeting. The NRC RISC chair noted that the NRC RISC is meeting on a more frequent basis in an effort to provide direction to the staff in regard to initiatives currently underway and welcomed the idea of a more comprehensive discussion in the meetings to come.

PRA Technical Adequacy Working Group NRC and Industry Working Group Status Update

NRC staff provided an update on continuing progress on the work resulting from the working group initiatives. NRC staff observed a pilot of the proposed independent assessment facts and observations (F&O) closure process and shared some of the NRC insights gained from that observation.

Staff outlined some of the strengths of the process including:

- The team had direct access to the PRA model of record and applicable documentation
- The team had access to the peer review report including text of the original F&O
- The process seems well suited to closing a number of types of F&Os

Staff also shared some other observations of the process:

- Identifying and dispositioning model upgrades –focused scope peer review needed
- Some F&Os were difficult to interpret and closure may not result in meeting capability category II without checking the supporting requirements
- The process prohibited finding new F&Os, which may not be feasible
- Clarity is needed between independent assessment team's exit meeting and the issuing report (can additional F&Os be closed during this time?)

NRC staff discussed the path forward including possibly observing additional independent assessment pilots, holding a public workshop on issues (e.g., industry reviewer independence, submittal guidelines, model upgrades) to reach a consensus position, and incorporating lessons learned into the NRC staff position.

NRC staff next presented on progress made on the new PRA method evaluation process. The majority of the conversation was focused on the industry major comments that were provided on the NRC staff position paper. The NRC staff shared some points on the path forward including the need for a fee waiver request. The NRC staff also requested the status of a related working group initiative that was cataloguing NRC accepted methods available for use in PRA. The industry reported that there were competing initiatives for resources and progress wouldn't be expected until the end of the calendar year at the earliest.

Updated on Proposed Changes to RG 1.174

The NRC staff gave an update on the efforts to revise RG 1.174. The NRC staff outlined the direction that has been provided by the Commission to update the guidance and the additional

scope that has been requested by the industry. The NRC staff also discussed the timeline and possible impacts based on the requested increase in scope. It was also presented that there is a public meeting scheduled for September 1, 2016 to discuss the scope and example that the industry provided. The NRC staff closed the topic by informing the RISCs that the working group will review the recommendations from the public meeting and brief the RISC on any further actions or recommendations.

Discussion on Crediting MS in RIDM

NRC staff provided an update on activities performed to date with respect to crediting MS in RIDM. The NRC staff discussed the letter from the Director of the Office of Nuclear Reactor Regulation that was issued responding to the development of two white papers by industry regarding crediting MS in RIDM. The NRC staff also discussed the plans to update NRC internal guidance for crediting MS in RIDM including a draft timeline of the efforts. The industry chair expressed his support for the effort and encouraged the NRC staff to reach out to the industry and take advantage of opportunities to tour sites and see the equipment. The NRC staff and industry closed the topic by stating there would be periodic interactions during the guidance update process.

Discussion on FLEX in NUMARC 93-01

The industry led a discussion on the proposed revision to NUMARC 93-01, specifically the language regarding FLEX equipment and scoping criteria. The discussion focused on the proposed language and whether it would unnecessarily scope equipment into the maintenance rule or leave out equipment uses that should be scoped into the rule. The discussion closed with industry and the NRC agreeing to continue to work together to reach a mutually agreeable position on the language.

Discussion on Fire PRA Realism

The industry also led a discussion on fire PRA realism, specifically the recent removal of a frequently asked question (FAQ) on very early fire detection systems. The industry RISC was concerned with the removal of the FAQ and the potential consequences on the industry members. The NRC staff commented that it became clear that research efforts had shown there wasn't as much credit as originally believed, so action was required. The NRC staff also noted that a public meeting had taken place, although the industry commented it may not have been clearly indicated what actions the NRC was proposing to take on the subject.

Closing Remarks

The industry RISC chair closed by citing the industry desire to keep the high level discussions between the management teams moving forward for the mutual benefit of both the industry and NRC. The NRC RISC chair expressed his support for continued collaboration, thanked the participants for their attendance, and closed the meeting.

Enclosure:
As stated

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NAME	MMontecalvo	SWeerakkody
DATE	09/07/2016	09/07/2016

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LIST OF MEETING ATTENDEES

Name	Organization
Paul Harden	First Energy
Bill Dean	NRC
Greg Krueger	NEI
Thomas Zachariah	NEI
Stacey Rosenberg	NRC
Ed Hackett	NRC
Danny Bost	Southern Company
Joe Giitter	NRC
Victoria Anderson	NEI
Michael Montecalvo	NRC
Stuart Lewis	EPRI
JS Hyslop	NRC
Steve Dinsmore	NRC
Jeff Mitman	NRC
Scott Moore	NRC
Brian Metzger	NRC
Michael Tschiltz	NEI
Paul Amico	Jensen/Hughes
Phil Tarpinian*	Exelon
Roy Linthicum	Exelon/PWROG
Tony Pietrangelo	NEI
Rich Correia	NRC
Steve West	NRC
Sunil Weerakkody	NRC
Bob Bement	APS Palo Verde
Steve Dolley*	Platts
Jana Bergman*	Scientech
Sean Peters*	NRC
Vonna Ordaz	NRC
John Lai*	NRC
Nick Melli*	NRC
Donnie Harrison	NRC
Laura Kozak*	NRC
Anders Gilbertson	NRC
Matt Humberstone	NRC
James Slider	NEI
Candace Pfefferkorn*	NRC
Scott Greenlee	Exelon
Susan Cooper*	NRC
Mark Caruso	NRC
Miheala Biro	NRC
Mary Drouin	NRC
Ami Patel	NRC

* Participated by teleconference