

January 19, 2017

MEMORANDUM TO: Stacey L. Rosenberg, Chief  
Probabilistic Risk Assessment Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: Adrienne F. Driver, Risk and Reliability Analyst */RA/*  
Probabilistic Risk Assessment Licensing Branch  
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SUBJECT: SUMMARY OF THE NOVEMBER 29, 2016, PRA TECHNICAL  
ADEQUACY FOR F&O CLOSURE AND EVALUATION OF NEW  
METHODS CATEGORY 2 PUBLIC MEETING BETWEEN NUCLEAR  
REGULATORY COMMISSION AND NUCLEAR ENERGY INSTITUTE  
REPRESENTATIVES

On November 29, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting with the Nuclear Energy Institute (NEI) and industry stakeholders to discuss issues related to 1) Process for Closure of Facts and Observations (F&Os) and 2) Evaluation of New Methods. The meeting notice and agenda was made available at Agencywide Document Access and Management System (ADAMS) Accession No. ML16328A333.

The issues and proposed solutions discussed during this meeting are considered pre-decisional and do not necessarily reflect the Nuclear Regulatory Commission (NRC) staff's position until they are formally accepted for processing. The discussion of meeting topics is included in the summary below.

After formal introductions, the staff provided an update on items concerning the draft RG 1.200 regulatory staff position, draft NEI 05-04, Appendix X guidance, and the pilot observations by giving presentations on "PRA Technical Adequacy Working Group Improved Process for Closure of Industry Peer Review Facts and Observations" and "New PRA Method Evaluation Process." These presentations are available at ML17018A212.

Agenda Topic: Improved Facts and Observations Closure Process

NEI provided an update on the industry's F&O pilot lessons learned, intended guidance changes, and recommended path forward. The discussion included evolution of the host utility pilot fleet procedure and the intentions of the host utility fleet procedure to be used as a model for development of the NEI 05-04, Appendix X guidance governing the F&O closure process.

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The NRC staff provided presentation to address comments received from industry on the draft regulatory staff position along with identified concerns from staff review of the industry guidance and observations of the two industry pilots for F&O closure. NEI plans to pursue incorporation of issues along with recommended paths for resolution discussed in an update of their draft industry guidance. Discussions of staff concerns with the industry draft guidance primarily included (1) Documentation of the resolution (2) Identification of PRA upgrades used for resolution of an F&O (3) Generation of new and potential issues identified by the independent assessment team and (4) Closure for F&Os between Independent assessment team exit meeting and issuance of the final report. The NRC emphasized the importance of incorporating the staff issues identified into the industry draft guidance along with alignment of the staff regulatory position for NRC to endorse the industry guidance governing an F&O closure process.

An update of the staff observations of the two pilots conducted was provided in the presentation. The staff communicated the need to observe an additional pilot using the updated generic guidance incorporating the primary staff concerns along with diversity in review of the implementation of host utility guidance and the overall process.

#### Agenda Topic: NRC Close-Out of Peer Review Findings

NRC staff member provided presentation to engage industry stakeholders on a proposal for NRC review to close-out peer review facts and observations. This presentation received strong objection from the industry with primary concerns regarding peer review reports being made public documents, and NRC participation on the original peer review team.

#### Agenda Topic: New Methods Evaluation Process

The NRC staff provided a presentation to address the NRC review of the industry proposed vetting panel process along with the submission of a fee waiver by the industry. The staff reiterated the technical role of the panel; however, industry indicated that the level of review should be discussed before the panel proceeds with a discussion of its technical review. The staff clarified that the NRC review during the closure process is not expected to be a wholesale review; in fact the review will be directed to the concerns raised with the method, should any be raised.

Further discussions included assessment of the risk impact of the method in the NRC acceptance review and the importance of the method's value for prioritization of resources for all stakeholders. Staff from the PRA licensing branch clarified that it is recommending the fee waiver be accepted for NRC review of NEI 16-04 and the pilot PRA methods to the extent that they support RG 1.200, Revision 3; however, the fee waiver acceptance is subject to the Office of the General Counsel and Office of the Chief Financial Officer for approval. Also, an additional fee waiver does not need to be submitted. NRC staff has agreed to additional dialogue with industry stakeholders specifically regarding risk impact of the method.

#### Agenda Topic: Path Forward

The NRC staff provided a presentation outlining a timeline for the next steps to be taken regarding the F&O closure process, Evaluation of New Methods process, as well RG 1.200 Revision 3 update. The staff communicated to NEI and the industry that although RG 1.200, Revision 3 was scheduled to be issued in 2018, it would still review any updated generic guidance NEI provides concerning the F&O closure process and consider interim approval as early as 2017. Additional discussions regarding the incorporation of the NEI 05-04, and other NEI documents into one governing document was discussed. The industry agreed that updates

to address consistency across the guidance documents is necessary and efforts would be pursued to address in the near future.

Enclosure:  
As stated

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DATED:

DISTRIBUTION:

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**PRA TECHNICAL ADEQUACY  
PUBLIC MEETING BETWEEN NUCLEAR REGULATORY COMMISSION AND  
NUCLEAR ENERGY INSTITUTE REPRESENTATIVES  
LIST OF ATTENDEES**

November 29, 2016

**U. S. Nuclear Regulatory  
Commission Staff**

NRC/NRR/DRA

S. Rosenberg  
A. Driver  
J.S. Hyslop  
L. Fields  
J. Evans  
S. Dinsmore

NRC/RES/DRA

M. Drouin

Et al.

**Stakeholders**

Industry

V. Anderson (NEI)  
P. Amico (Jensen-Hughes)  
R. Linthicum (PWROG, Exelon)  
M. Tschultz (NEI)  
D. Vanover (Jensen-Hughes)  
J. Stone (Exelon)  
A. Mironenko (Duke)  
B. Dolan (TVA)  
G. Krueger (Exelon)  
A. Moldenhauer (Dominion)\*  
A. Maioli\*  
B. Sloane (Jensen-Hughes)\*  
D. Miskiewicz (EPM)\*  
J. Richards\*  
M. Lewis\*  
R. Rishel (Duke)\*  
J. Weglian\*

Members of Public

Jana Bergman (Curtis-Wright)  
Marvin Lewis