

Enclosure 6

Closure Process for Industry

Peer Review

Facts and Observations

Meeting Summary of the 11/29/2016 Meeting with

U.S. Nuclear Regulatory Commission

and

Nuclear Energy Institute

DATED: January 19, 2017

Closure Process for Industry Peer Review Facts and Observations

Public Meeting: Risk-Informed Steering Committee
December 6, 2016

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F&O Closure Process History

- **June 2015** – NEI submitted white paper to NRC recommending Hybrid Approach
- **January 2016** – NRC response letter recommend the Hybrid Approach concept be further pursued
- **February 2016** – NEI submitted one page draft guidance introducing the Independent Assessment option
- **April 2016** – NRC issued draft staff regulatory position
- **May 2016** – Public meeting to discuss staff position and NEI guidance
- **July 2016** – First industry pilot
- **September 9, 2016** -- NEI letter clarified that the licensee close-out was renamed Independent-Assessment.
- **November 2016** – Second industry pilot
- **November 29, 2016** -- Public meeting with industry WG

November 29th Public Meeting

- **NRC Perspectives: RG 1.200 Draft Staff Position**

- Generic guidance received February 2016 insufficient for staff endorsement
 - Generic guidance needs to address staff position and lessons learned from the pilots
- Additional pilot needed:
 - First two pilots based on host utility guidance, not on NEI generic guidance
 - Pilot with different utility to observe using updated generic guidance

Pilot Independent Assessment NRC Observations

- **NRC Perspective of Pilot(s):** Overall the process appears suitable for closure of F&Os addressing:
 - Documentation issues
 - Individual modelling and method errors
 - Incorrect F&O's

- 1. Insufficient guidance for identification and disposition of model upgrades
 - Focused scope peer review per ASME Standard may still be needed
 - **Path for Resolution:** Industry to incorporate into their guidance a requirement to review the licensee's determination of upgrades for each F&O

- 2. Independent Assessment (IA) process guidance prohibits finding and/or documenting new F&Os
 - **Path for Resolution:** Improve NEI guidance that new F&Os should not be ignored but documented in the IA team report and submitted to the NRC for future risk applications by the licensee

Pilot Independent Assessment NRC Observations

3. Documentation of the resolution

- F&Os are characterized as documentation, however SR write-up in peer review reports are unclear at times
- F&Os should not be closed with a suggestion stating documentation is incomplete
- **Path for Resolution:** Generic guidance to address a new category, “partially resolved – documentation only.” Any partially resolved F&O(s) should still be submitted to NRC for future risk applications by the licensee

4. IA team’s exit meeting and issuance of the final report

- Staff is uncertain which F&Os are considered for closure during this interim time
- Unclear which unresolved F&Os can be closed
- **Path for Resolution:** Generic guidance to address how the IA team addresses resolution of F&Os considered open after the assessment is performed but prior to completion of the independent assessment final report.

NRC Schedule and Audits

December 2016 – NRC staff to update regulatory position on the F&O closure process based on industry comments and lessons learned from pilots

December 2016/January 2017 – NEI to provide final guidance on F&O closure process

January/April – NRC staff to observe additional pilot(s) using updated industry generic guidance.

April/May 2017* – NRC to issue “letter” on acceptability of F&O closure process

**Milestone date contingent upon the alignment of industry generic guidance with NRC staff regulatory position*