

February 2, 2017

MEMORANDUM TO: Alexander R. Klein, Chief
Technical Specifications Branch
Division of Safety Systems
Office of Nuclear Reactor Regulation

FROM: Michelle C. Honcharik, Senior Project Manager */RA/*
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE JANUARY 23, 2017, CATEGORY 2 PUBLIC
MEETING BETWEEN NRC AND NUCLEAR ENERGY INSTITUTE
REPRESENTATIVES RE: REQUEST TO REVISE EGM 11-003

On January 23, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting with the Nuclear Energy Institute (NEI) and industry stakeholders to discuss NEI's request for a clarifying revision to Revision 3 of Enforcement Guidance Memorandum (EGM) 11-003, "Dispositioning Boiling Water Reactor Licensee Noncompliance with Technical Specification Containment Requirements During Operations with a Potential for Draining the Reactor Vessel." The issues and proposed solutions discussed during this meeting are considered pre-decisional and do not necessarily reflect the NRC staff's position until the EGM is revised.

The following documents related to this meeting are available in the Agencywide Document Access and Management System (ADAMS):

- the meeting notice and agenda (ADAMS Accession No. ML17003A308),
- the NEI letter dated October 11, 2016, requested a revision to EGM 11-003 (ADAMS Accession No. ML16286A047),
- the NRC handout, "Potential Change to EGM 11-003" (ADAMS Accession No. ML17026A231), and
- the meeting attendee list (ADAMS Accession Nos. ML17026A232 and ML17026A234).

In their letter dated October 11, 2016, NEI requested that the EGM 11-003 be revised to define limited exclusions for evolutions that are currently treated as OPDRVs. This would include evolutions which involve the planned removal of water from the reactor pressure vessel (RPV) or refueling cavity using systems that have safety-related, redundant, and automatic isolation capability.

The NRC staff requested that NEI and industry representatives describe what, if any, specific routine evolutions would be permitted if the EGM were to be revised per the request. The NRC staff also requested insights into other benefits that could be realized by NEI's requested revision to the EGM.

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The industry participants explained that the requested revision of the EGM would permit the use of the reactor water cleanup (RWCU) system for draining evolutions. The participants described the benefits of using the RWCU system for this purpose.

In their meeting handout, the NRC staff proposed a slightly different approach for revising the EGM. The NRC staff requested that NEI review the proposed revision and requested feedback on whether the alternative approach would provide the desired benefits and did not have any unintended consequences.

The meeting participants identified some areas in which the proposed wording was not clear, and indicated that further review by stakeholders would be beneficial.

Path Forward:

- 1) NRC staff will draft a revision to the EGM to address feedback received during the January 23, 2017, meeting.
- 2) NRC staff will conduct another public meeting tentatively near the end of February with NEI and industry stakeholders to obtain industry perspectives on the draft revision to the EGM in response to feedback from the January 23, 2017, meeting.

The public was given an opportunity to comment near the end of the meeting. No comments were received and the meeting was adjourned.

Project No. 689

SUBJECT: SUMMARY OF THE JANUARY, 23, 2017, CATEGORY 2 PUBLIC MEETING
BETWEEN NRC AND NUCLEAR ENERGY INSTITUTE REPRESENTATIVES
RE: REQUEST TO REVISE EGM 11-003

DATED: February 2, 2017

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Accession Numbers: Package: ML17026A406;

Summary: ML17030A228;

NRC staff handout: ML17026A231

Sign-In Sheet pages 1 and 2: ML17026A232 and ML17026A234

NRR-106

*Concurred via e-mail

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Date	2/2/2017	1/31/2017	2/2/2017