

April 19, 2017

MEMORANDUM TO: Kevin Hsueh, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager */RA/*
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SUBJECT: SUMMARY OF FEBRUARY 28, 2017, MEETING ON DIGITAL
INSTRUMENTATION AND CONTROL INTEGRATED ACTION PLAN
MODERNIZATION PLAN #4

On February 28, 2017, U.S. Nuclear Regulatory Commission (NRC) staff met with representatives from the Nuclear Energy Institute (NEI). The purpose of the meeting was to discuss Modernization Plan #4 (MP #4) of the digital instrumentation and control (DI&C) Integrated Action Plan (Agencywide Documents Access and Management System (ADAMS) Package Accession Number ML16126A137). Information related to the meeting and discussed in this summary can be found in the ADAMS Package Accession Number ML17032A040.

During its presentation, the NRC staff was asked what is meant by technology-neutral. In response, the NRC staff explained that technology-neutral I&C regulations have two aspects: 1) they equally apply to any reactor type; and 2) they equally apply to any I&C technology.

NRC staff was then asked whether analog technology will be considered within the technology-neutral scope of MP #4. The NRC staff answered that the direction from the Commission includes addressing technology neutrality in modernization of the DI&C regulatory infrastructure, which includes both regulations and guidance. When developing the modernized DI&C regulatory infrastructure, the NRC staff stated their objective that regulations equally apply to both digital and analog technology. NRC staff also stated high-level guidance can also be technology-neutral. However, the NRC staff noted that some guidance is technology-specific, and lower-level guidance could continue to contain technology-specific provisions.

During the NRC staff presentation, it noted industry's issue of having the review of Factory Acceptance Test (FAT) results be part of a DI&C design's license amendment review rather than inspection. The NEI representatives acknowledged this, but added FAT was only one aspect of post design information that should be considered for the inspection when revising the license amendment process. The NRC staff agreed FAT was just one aspect to be considered.

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The NEI representatives also raised the need for “good, clean” inspection guidance for consistent inspections of DI&C modifications. One point raised by the NEI representatives was that they expected continued focus by inspectors of DI&C modifications based on their recent experiences. The NRC staff stated that inspection guidance is considered part of the DI&C regulatory infrastructure and is part of the MP #4 scope.

One recommendation made by the NEI representatives was the development of a communication and assessment plan. This was later augmented by a comment that a resource plan also be included. The NRC staff agreed such a plan could aid modernization planning and awareness.

The NRC staff discussed the workshops identified in its presentation. As part of the workshops, the NRC expected participation from industry (new and operating reactors), vendors, other experts (such as British regulators), and other public stakeholders.

NEI representatives made two presentations that can be found in the ADAMS package cited earlier.

Following these presentations, NEI representatives proposed the near-term focus of MP #4 be revising the DI&C license amendment process. Staff agreed there are opportunities to improve the DI&C license amendment process, including consideration of various industry concepts and suggestions. Following the proposal, NRC staff asked why this should be a near-term priority and when it would need to be completed. NEI representatives responded that a completion in December 2017 is needed to support a substantial DI&C modification. This modification requires a lead-time of 2-years to support licensee planning.

After this discussion, the general approach to future MP #4 public meetings was raised by NEI representatives. NEI representatives highlighted preliminary discussions and agreements that future meetings be less presentation-oriented and more “roll-up-your-sleeves working meetings.” To support this approach, the plan is to exchange short topic-specific white papers 10-days before the meetings, and then meet to have focused discussions on them. NRC staff stated this approach is intended to yield timely decision making and progress. NEI representatives also proposed scheduling MP #4 meetings at about 6-week intervals and setting dates for the next four MP #4 meetings. The NRC staff agreed with these approaches.

Industry proposed the first meeting focus on a revised DI&C license amendment process. NRC staff requested any white papers on a revised DI&C license amendment process include milestones to support a December 2017 completion.

Actions identified during the meeting are:

- 1) NRC/NEI - Finalize the topic, date, and location for the next MP #4 public meeting (proposed by NEI representatives for April 13, 2017, on a revised DI&C license amendment process, to be held at an industry location);
- 2) NRC/NEI – Prepare white papers on finalized topic and exchange white papers 10 days before the next meeting;
- 3) NRC/NEI - Set dates for the next four MP #4 meetings at about 6-week intervals.

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