

Modernization Plan #1-Protection Against Common Cause Failure

Public Meeting to Preview

NEI 16-16, Appendix A

April 11, 2017

MP #1B/1C Working Group

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Outline

- Opening Remarks, Safety, Introductions
- Objectives of MP #1B and #1C
- NEI 16-16 Review Recap
- Preview of Nuclear Energy Institute (NEI) 16-16, Appendix A
- Stakeholder Participation
- Summary and Action Items

Objectives

- MP #1B - Evaluate Industry's proposed guidance in NEI 16-16.
- MP #1C – Evaluate the current position of the Nuclear Regulatory Commission (NRC) on protection of DI&C systems and components against CCF.

For more details, see Revision 1-Draft to Integrated Action Plan (IAP) to Modernize Digital Instrumentation and Controls Regulatory Infrastructure [Agencywide Document Access and Management System (ADAMS) Accession Number [ML16326A275](#)]. Note that IAP Revision 1 will be finalized in April.

NEI 16-16 Review Recap

- December 2016 - NEI 16-16 [Draft 1] submitted.
 - Early draft intended to give staff an idea of framework and structure of the document.
 - ADAMS Accession Number [ML17033B139](#)
- February 8, 2017 – Public Meeting on NEI 16-16 and NEI 96-07.
 - ADAMS Accession Number [ML17004A259](#)
- March 13, 2017 – NRC comments sent to NEI.
 - ADAMS Accession Number: [ML17072A142](#)
- March 29, 2017 – NRC and NEI met to discuss and clarify NRC comments on NEI 16-16 [Draft 1].
 - ADAMS Accession Number [ML17073A002](#)

Discussion, Questions, Feedback

- This portion of the meeting turned over to NEI to lead discussion on NEI 16-16, Appendix A.

Next Actions

- April 28, 2017 – NEI to submit NEI 16-16 [Draft 2] with Appendix A included.
- May 31, 2017 – NRC to complete review and provide comments on NEI 16-16 [Draft 2].
- Develop understanding of next steps – NRC and NEI interactions on NEI 16-16 drafts.

Path forward – Draft Schedule MP #1B

Evaluation of NEI 16-16

	Activity	Schedule
B.1	Begin staff evaluation of NEI 16-16 [Draft 1] received 12/22/2016 and develop staff comments/gap analysis.	December 2016
B.2	Meeting to discuss NEI's plans for completion of CCF likelihood technical basis, associated defensive measures, Appendices, and the balance of NEI 16-16 content.	February 8-9 2017
B.3	NRC to provide comments on NEI 16-16 [Draft 1]	March 13, 2017
B.4	Meeting to discuss and clarify NRC comments on NEI 16-16 [Draft 1]	March 29, 2017
B.5	Meeting to preview NEI 16-16 Appendix A content to be included in Draft 2 of NEI 16-16.	April 11, 2017
B.6	NEI to deliver Draft 2 of NEI 16-16, including technical basis, examples, and Appendices.	April 28, 2017
B.7	NRC staff to review and provide comments on NEI 16-16 [Draft 2].	May 31, 2017
B.8*	NEI to deliver draft updates of NEI 16-16.	April – August 2017 (As-needed)

Path forward – Draft Schedule MP #1B

Evaluation of NEI 16-16

	Activity	Schedule
B.9*	Meetings to discuss methodology, content, and technical basis.	April – August 2017 (As-needed)
B.10*	NRC staff to review and provide comments on NEI 16-16 draft updates.	April - September 2017 (As-needed)
B.11**	Complete staff review of NEI 16-16, and make determination as to its “endorse-ability” or partial “endorse-ability.”	October 2017
B.12*	Draft Final Staff Evaluation of NEI 16-16.	November 2017
B.13*	Present to Advisory Committee on Reactor Safeguards (ACRS)	December 2017
B.14*	Issue NRC Management’s letter with regard to recommendations on endorsing NEI 16-16.	January 2018
B.15*	NEI to submit NEI 16-16 Final.	February 2018
B.16*	Final Staff Evaluation of NEI 16-16.	May 2018
B.17*	Issuance of Staff evaluation and implementation of NEI 16-16 (post Commission decisions, if needed, with regard to MP #1C).	June 2018

*Scheduled dates may change as NRC staff and NEI engage in NEI 16-16 draft update and review process.

+ Related to MP #1C item C.3.

Path forward – Draft Schedule MP #1C

Evaluation of NRC's current position on defense against CCF*

	Activity	Schedule
C.1	Begin staff review to identify specific aspects of NRC's position on CCF and communicate any policy issues that need to be modified. Meet with DI&C Steering Committee and other stakeholders as needed.	April-July 2017
C.2	Develop and finalize list of specific aspects of NRC's position on CCF impacted by review of NEI 16-16 draft updates and alert Commission of policy issues that will require attention.	April - August 2017
C.3+	Decide on need to affirm or modify NRC's position on defense against CCF in DI&C systems and components.	October 2017
C.4	Produce technical basis document to support affirmation or modification of NRC's position.	November 2017
C.5	Engage outside peer reviewer to assess staff's findings.	January – April 2018
C.6	Solicit and disposition public comments	February 2018
C.7	Present to ACRS	April 2018

Path forward – Draft Schedule MP #1C

Evaluation of NRC's current position on defense against CCF*

	Activity	Schedule
C.8	Submit Commission paper (SECY) identifying proposed action to modify or affirm existing position to the Commission.	May 2018
C.9	Implement resolution as determined by the Commission.	June 2018
C.10	Revise Branch Technical Position 7-19 for consistency with Commission decision.	September 2018

*Schedule of MP #1C may be adjusted as NEI 16-16 is reviewed.

+ Related to MP #1B item B.8.

Acronyms

ACRS – Advisory Commission on Reactor Safeguards

ADAMS - Agencywide Document Access and Management System

CCF – Common Cause Failure

DI&C – Digital Instrumentation and Controls

MP – Modernization Plan

NEI – Nuclear Energy Institute

NRC – Nuclear Regulatory Commission
