



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 6, 2017

MEMORANDUM TO: Mandy K. Halter, Acting Chief  
Performance Assessment Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Ayesha Athar, Reactor Operations Engineer */RA/*  
Performance Assessment Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING  
GROUP PUBLIC MEETING HELD ON MARCH 23, 2017

On March 23, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff hosted the Reactor Oversight Process (ROP) working group public meeting with the Nuclear Energy Institute (NEI) ROP Task Force and other industry representatives. Meeting attendees discussed various topics including Performance Indicator (PI) Frequently Asked Questions (FAQs) and the ROP for new reactors.

Enclosure 1 contains the meeting attendance list.

Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17100A256) contains the presentations and handouts discussed during the meeting.

Enclosure 3 (ADAMS Accession No. ML17100A263) contains the PI FAQs Log and the FAQs discussed during the meeting.

Branch Updates

The Division of Risk Assessment representative informed the attendees that the Director of the Office of Nuclear Reactor Regulation, William Dean had signed out the NRC letter in response to the Exelon letter, dated January 12, 2017 regarding suggestions for improving the Significance Determination Process (SDP). Specifically, the NRC letter communicates the Agency's intent to continue dialogue between the staff and external stakeholders on refining processes to better risk-inform the NRC oversight activities. NRC staff will coordinate with NEI to conduct public meetings and workshops in the coming months to solicit feedback to enhance processes and guidance.

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Potentially Generic Inspection-Related Issues

NEI introduced an emerging issue pertaining to emergency diesel generator (EDG) load reject surveillance requirements. Enclosure 2 contains the details of this topic.

Industry Efforts

NEI (Jim Slider and Chris Earls) briefed tentative plans in connection with NEI-16-07 (CAP-2):

- NEI now intends to deliver DRAFT NEI 16-07 (CAP-2) guidance to NRC in late-April or early May 2017. NRC suggested a public meeting for NEI to outline the content of the draft guidance in this timeframe.
- Currently, NEI intends for NRC to make the document public but is not requesting NRC review or endorsement.
- NEI intends to conduct workshops with corrective action program (CAP) owners and users and invite the NRC to attend with a purpose to discuss application of CAP-2, answer questions, and address concerns. NEI currently plans to conduct the workshops through the non-public Regional Utility Groups (RUGs) meetings.
- NEI's tentative plan is for the RUG to conduct four (4) ½ day workshops and to seek broad region-based NRC inspector and resident inspector attendance as well as program office Problem Identification & Resolution staff to promote uniform cross-regional understanding. The NRC indicated no commitment at this time on whether, and to what extent, inspection staff could support the NEI proposal. NEI proposed dates for the workshops were as follows
  - a. Region 1 – July 2017
  - b. Region 2 – June 2017
  - c. Region 3 – October 2017
  - d. Region 4 – September 2017
- Following the workshops, NEI will seek to hold a subsequent public meeting at NRC Headquarters in the November-December 2017 time-frame to address any remaining questions or concerns after which DRAFT NEI 16-07 (CAP-2) will be finalized.
- Although NEI does not currently seek formal NRC review, it could revisit that plan following the above activities if it determines that a formal NRC review would be beneficial.
- Four industry Chief Nuclear Officers have been identified as principal communicators of NEI's Delivering the Nuclear Promise (DNP)/CAP-2 initiative.
- NEI's Chris Earls pointed out that NEI plans to issue NEI 16-07 (CAP-2) as a "Red Bulletin" which, Mr. Earls explained, mandates implementation as written by all utilities. A Red Bulletin mandates that, if an 80% affirmative vote is attained, all licensees are required to adopt the initiative.

### Frequently Asked Questions

In the area of the PI program, staff and industry discussed FAQ 16-04, FAQ 17-01, and FAQ 17-02:

- FAQ 16-04: This FAQ was proposed by Tennessee Valley Authority (TVA), concerning a reported Safety System Functional Failure (SSFF) at their Browns Ferry 2 unit during a planned maintenance outage for the High Pressure Safety Injection system where a breaker failed. The resident inspectors determined that this failure was not related to the maintenance activity and therefore was reportable as a SSFF. The licensee stated that since the failure occurred during a maintenance outage, it should not count towards the SSFF PI and is requesting that NEI 99-02, "Regulatory Assessment Performance Indicator Guidelines," be updated to include guidance that would allow licensees to not report SSFFs for the PI under these circumstances. The staff provided a draft response outlining that NUREG-1022 already allows for licensees to not report conditions caused during planned maintenance as long as Technical Specification action statements are met. As such, no update to NEI 99-02 guidance is required. The staff committed to making editorial changes to the NRC response and providing the updated FAQ to industry prior to the April public meeting.
- FAQ 17-01: This FAQ was proposed by Entergy regarding an event that occurred in June 2016. During turbine stop valve testing, a solenoid valve failure led to multiple vessel level and reactor power oscillations over an extended period of time, followed by an automatic reactor scram. The NEI 99-02 guidance for the Unplanned Power Changes per 7000 hours PI does not account for an event such as this. The licensee is seeking clarity from the ROP Working Group on whether this event should count only as a reactor scram, or if it should count towards the Unplanned Power Change PI as well, and if so, how many times. The working group briefly discussed some of the interpretations and approaches that could be taken for this FAQ. The staff conducted multiple internal discussions with the region to determine the best approach to this response. An Appendix D site specific FAQ was drafted that addressed this particular issue without attempting to update the NEI 99-02 guidance. The staff endeavored to adhere to the basic principles of the IE03 PI and the ROP in general while understanding that a literal interpretation of the NEI guidance was not possible. Headquarters and regional staff independently attempted to measure the number of discreet issues that led to this transient. Then compared their numbers and settled on three unplanned power changes for PI purposes. A draft response was provided to the ROP Working group and industry discussed whether the operator errors that contributed to this event should count as one error or multiple. The staff committed to discussing this with operator licensing and returning with any changed response in the April meeting.
- FAQ 17-02: This FAQ was proposed by Arizona Public Service regarding a rapid downpower due to a turbine trip followed by a manual scram. The licensee believes this event should count as one unplanned scram, but the residents believe that the scram was a separate event and should count as a separate scram along with an unplanned power change. The staff received this FAQ, discussed the event with the licensee, and committed to providing a draft response at the April meeting.

The staff also discussed the effort to update NEI PI guidance for plants in extended shutdowns or during initial startup. The staff committed to submitting a white paper with proposed guidance for incorporation into NEI 99-02. This guidance will clarify when to label PIs invalid and monitorable during and following extended shutdowns and during initial startup.

### Holistic Review of Engineering Inspections

NRC staff provided the following update to the Agency's plans for performing a holistic review of the ROP baseline engineering inspections procedures. The purpose for performing the holistic review is to identify more efficient ways to perform the current slate of engineering inspections the baseline inspection program. The inspection procedures (IPs) which will be included in this holistic review includes:

- IP 71111.05T, "Fire Protection (Triennial)"
- IP 71111.07, "Heat Sink Performance"
- IP 71111.08, "Inservice Inspection Activities"
- IP 71111.17T, "Evaluations of Changes, Tests, and Experiments"
- IP 71111.21M, "Design Bases Assurance Inspection (Team)"
- IP 71111.21N, "Design Bases Assurance Inspection (Program)"

As well as some of the engineering inspections being performed by the resident inspector staff.

NRC staff is currently working on developing a charter for performing the holistic review.

NRC has identified working group members and the first meeting of the working group was held on March 21, 2017.

NRC plans to conduct an internal meeting in April or May of 2017 for the purposes of performing the holistic review with its working group members. The staff plans to conduct additional public engagement to discuss the results of their review during the summer of 2017.

### ROP for New Reactors

The staff presented what it envisions to be the modified SDP for New Reactors (i.e., AP 1000). Central to the staff's initial findings is NRC Commission direction provided in SRM-SECY-13-0137, Recommendations for Risk Informing the Reactor Oversight Process for New Reactors. The staff performed a gap analysis of the existing SDP program and determined that nine documents would likely be affected. These include the following Inspection Manual Chapters (IMCs):

- IMC 0308, Attachment 3, Significance Determination Process Technical Basis Document
- IMC 0609, Appendix A, The Significance Determination Process (SDP) for Findings At-Power and associated technical basis document
- IMC 0609, Appendix G, Shutdown Operations Significance Determination Process and associated technical basis document
- IMC 0609, Appendix H, Containment Integrity Significance Determination Process and associated technical basis document
- IMC 0609, Appendix M, Significance Determination Process Using Qualitative Criteria and associated technical basis document

The staff requested that industry representatives formulate their views on any additional changes that might be needed to accommodate the AP 1000 design. The staff will document its conclusions in a Commission paper to be completed by December 2017, and any necessary changes to the SDP program will be completed prior to December 2018.

The staff acknowledged receipt of the industry's comments on the Draft Implementation Plan to Ensure NRC Staff Readiness for AP1000 Operations, Rev. 0 (ADAMS Accession No. ML15299A390) and noted its intent to discuss this draft document and the industry's comments

at a future ROP Working Group meeting, potentially in May 2017. The staff also noted its intent to discuss the results of the baseline inspection procedure change analysis with stakeholders during the May 2017 ROP Working Group meeting. The next steps are to develop and share the draft Commission paper proposing the recommended changes to the ROP for new reactors in August 2017, discussing the draft Commission paper with the Advisory Committee on Reactor Safeguards (ACRS) and other stakeholders in September and October 2017, and incorporating feedback and issuing the Commission paper by the end of 2017.

M. Halter

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**ADAMS ACCESSION NO.: ML17100A268**

**ADAMS Package No.: ML17100A235**

**\*concurrent via email**

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<b>NAME</b>	AAthar	CRegan	MHalter	AAthar
<b>DATE</b>	4/5/2017	4/5/2017	4/6/2017	4/6/2017

**OFFICIAL RECORD COPY**

**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
March 23, 2017**

Theresa Clark*	NRC	Peter Wilson*	TVA
Stephen Campbell	NRC	Robin Ritzman	First Energy
Sunil Weerakkody	NRC	James Slider	NEI
John Rutkowski*	NRC	Jim Landale	Exelon
Ross Telson	NRC	Carlos Cisco*	Winston
Ayesha Athar	NRC	Ken Heffner	Certrec
Daniel Merzke	NRC	Jeff Hardy	Entergy
Robert Krsek	NRC	Larry Parker	STARS Alliance
Mandy Halter	NRC	Darani Reddick	Exelon
See-Meng Wong	NRC	Diane Aitken	Dominion
Ron Frahm	NRC	Erin Anners	Southern
Jim Isom	NRC	Deann Raleigh	Curtiss Wright
Russell Gibbs	NRC	James Pak	Dominion
Patrick Castleman	NRC	Ron Gaston	Exelon
Chris Miller	NRC	Tony Zimmerman	Duke Energy
Odunayo Ayegbusi	NRC	Bryan Ford	Entergy
Michael Levine	NRC	Lenny Sueper	Xcel Energy
Jeff Mitman	NRC	Keith Jury	Exelon
Christopher Regan	NRC	Chris Earls	NEI
Kenneth O'Brien*	NRC	Greg Cameron	NEI
Matt Young*	NRC	George Andrews	APS
Stephen Monarque*	NRC	Ryan Treadway	Duke
Scott Freeman*	NRC	Mike Murray	STP
		Robert Chu	APS
		Kenichi Watanabe	Japanese NRA <sup>†</sup>
		Izumi Amagasa	Japanese NRA <sup>†</sup>
		Masakazu Ishii	Japanese NRA <sup>†</sup>
		Kazuhiko Kishioka	Japanese NRA <sup>†</sup>

\*participated via teleconference and/or online meeting

<sup>†</sup>on rotation to NRC from Japanese Nuclear Regulation Authority