



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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June 6, 2017

MEMORANDUM TO: Mandy K. Halter, 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 MAY 18, 2017

On May 18, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff (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. MLXXXX) contains the presentations and handouts discussed during the meeting.

Enclosure 3 (ADAMS Accession No. ML17159A482) contains the PI FAQs Log and the FAQs discussed during the meeting.

Branch Updates

The Performance Assessment Branch provided an update on the topic of Minor/More-than-Minor consistency across the regions. One area where staff took action was to evaluate whether something is more or more than minor. Staff will not take away the threshold for minor, but plans to spend less time documenting this particularly for green findings. The Performance Assessment Branch Chief recognized that the NRC staff can do more to provide NRC inspectors with guidance on how to decide whether an issue is minor.

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NRC staff from the Office of Nuclear Reactor Regulation's Division of Inspection and Regional Support (NRR/Division of Inspection & Regional Support (DIRS)) requested that the most appropriate industry representatives be present at the July 13, 2017 ROP meeting to discuss the following:

- Industry feedback on the Inspection Finding Resolution Management initiative trial period
- The role of the Senior Reactor Analyst for both inspections and the Significance Determination Process
- The efficacy of the Significance Determination Processes (SDPs) used for the emergency preparedness, radiation protection and security cornerstones, Inspection Manual Chapter (IMC) 0609 Appendices B, C, D and E, respectively

In addition, the staff updated industry on the progress of the enhancements being made to IMC 0609 Appendix M whose focus is to provide clarity and specificity to its entry conditions, identify the necessary decision-making attributes, develop a method to evaluate these attributes and provide a means to integrate the results into a significance determination.

#### Holistic Review of Engineering Inspections

NRC holistic engineering working group will meet during the week of May 30<sup>th</sup> through June 2<sup>nd</sup> to develop recommendations for the engineering inspection program. The following Inspection Procedures (IPs) are included in the scope of NRC review:

- IP 71111.05T, "Fire Protection (Triennial)" or IP 71111.05XT, "Fire Protection-NFPA 805 (Triennial)"
- IP 71111.07, "Heat Sink Performance"
- IP 71111.08, "Inservice Inspection Activities"
- IP 71111.12, "Maintenance Effectiveness,"
- IP 71111.18, "Plant Modifications,"
- 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)"

The first public meeting on this topic is scheduled for June 6<sup>th</sup> from 1 to 5 PM EDT to discuss both industry and NRC's efforts to date.

NRC staff indicated that they are open to suggestions for incorporating the industry's self-assessment in lieu of selected NRC team inspections. The NRC staff is looking to the industry to develop what the self-assessment process and the feature of self-assessment must include NRC's ability to independently verify its results as well as the self-assessment product needs to be available to the members of the public

NRC does not plan to conduct another Equipment Qualification (EQ) inspection during Calendar Year (CY) 2017 – 2020 at sites where pilot EQ inspection was conducted during CY 2015 and 2016.

### Frequently Asked Questions

In the area of the PI program, these are the current FAQs under discussion:

- FAQ 17-01: This FAQ was proposed by Entergy regarding multiple power oscillations in June, 2016. It was discussed during this meeting; a draft response provided in March was edited following internal staff discussion and Working Group comments. The staff is making some minor editorial changes and will provide a final draft for discussion at the June 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 believed 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 proposed a draft response and based on feedback will make some minor editorial changes and return with a final draft in the June meeting.
- FAQ 17-03: This FAQ, involving a previously presented white paper on critical hours updates for changes to Mitigating Systems Performance Indicator maintenance philosophy, was introduced and discussed. The staff will provide a draft response for discussion in the June meeting.

Staff white paper 17-01 was also introduced. This white paper attempts to address lessons learned from the Crystal River and Fort Calhoun shutdowns regarding the effect of low critical hours on certain initiating events PIs and Mitigating Systems Performance Index. The staff proposed adding additional guidance to NEI 99-02 to clarify when these PIs would be considered invalid and valid following subsequent startup. The working group provided some editorial feedback but also stated that new industry white papers were pending that may provide additional information for consideration. The staff agreed to consider these white papers before bringing the staff white paper back to the working group for discussion.

### Update to Radiation Protection Significance Determination Process and Bases

The staff introduced an effort to update the radiation protection SDPs as described in IMC 0609, Appendices C and D and IMC 0308, Appendices C and D. The updates are necessary to address administrative inconsistencies with the NRC's current inspection program and to address a gap in addressing transportation-related findings where licensees use incorrect packaging. NRC staff requested industry participation in the development of the new SDP, consistent with IMC 0609 direction. Staff also stated that, based on recent Commission guidance, the new SDP would require Commission approval before implementation. Therefore, rather than publishing a new SDP in September 2017, staff would be routing a Commission paper at that time to request approval for implementation.

### ROP for New Reactors

The staff discussed a proposed approach to evaluating and revising baseline inspection procedures for samples, hours and inspection staffing of AP1000 design plants. The staff communicated Inspection sample sizes may be based on the importance (high, intermediate and Regulatory Treatment of Non-Safety Systems) of the systems both inside and outside containment. The importance of each system is obtained from IMC 2519 – Construction Significance Determination Process and the list of important AP1000 systems was obtained from the safety performance verification matrix, the VC Summer combined license (ADAMS

Accession No. ML14100A092) and the AP1000 technology manual. The possibility of reducing inspection hours based on the percent reduction of components between AP1000 and conventional reactor designs (ADAMS Accession No. ML14274A306) was also discussed. The staff is assessing a proposal for appropriate inspection staffing levels based on the availability of important equipment during power operations and while a plant was in shutdown conditions.

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**ADAMS ACCESSION NO.: ML17159A473**

**ADAMS Package No.: ML17159A472**

**\*concurrent via email**

<b>OFFICE</b>	<b>NRR/DIRS/IPAB</b>	<b>BC:NRR/DIRS/IRIB</b>	<b>BC:NRR/DIRS/IPAB</b>	<b>NRR/DIRS/IPAB</b>
<b>NAME</b>	AAthar	SAnderson	MHalter	AAthar
<b>DATE</b>	06/05/2017	06/06/2017	06/06/2017	06/06/2017

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
May 18, 2017**

Eric Schrader	NRC	Jim Landale	Exelon
Jim Hickey	NRC	George Andrews	APS
Tony Brown	NRC	James Slider	NEI
Ross Telson	NRC	Tony Zimmerman	Duke
Steve Campbell	NRC	Kevin Ellis	Duke
Lauren Gibson	NRC	Greg Halnon	FENOC
Joanna Bridge	NRC	James Mallon	PSEG
Mandy Halter	NRC	James Pak	Dominion Energy
David Garmon	NRC	Robin Ritzman	First Energy
Chris Miller	NRC	Larry Parker	STARS Alliance
Russell Gibbs	NRC	Yasuyuki Shirao	Chubu Electric
Jim Isom	NRC	Desiree Wolfgramm*	Energy Northwest
Zachary Hollcraft	NRC	Lenny Sueper	Xcel Energy
Ayesha Athar	NRC	Darani Reddick	Exelon
Heather Jones*	NRC	Richard Rasmussen	Conger-Elsea
Philip McKenna*	NRC	Bruce Mrowca	ISL
Mary Anderson*	NRC	Ron Gaston	Exelon
Nicholas Karlovich*	NRC	Ken Heffner	Certrec
Robert Krsek	NRC	Deann Raleigh	Curtiss Wright
		Kevin Walden*	
		Southern Company	
		Keith Jury*	Exelon
		Michael Murray	STPNOC
		Peter Wilson	TVA

\*participated via teleconference and/or  
online meeting