



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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October 16, 2017

MEMORANDUM TO: Gregory T. Bowman, Chief
ROP Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Ayesha Athar, Reactor Operations Engineer */RA/*
ROP 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 SEPTEMBER 21, 2017

On September 21, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff (staff) hosted a 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 the Significance Determination Process (SDP) and fee billing enhancements.

Enclosure 1 contains the meeting attendance list.

Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17290A129) contains the presentations and handouts discussed during the meeting.

Enclosure 3 (ADAMS Accession No. ML17290A266) contains the Performance Indicator (PI) Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting.

Frequently Asked Questions

In the area of the PI program, FAQ 17-03 was the only FAQ that was open at the time of this meeting. NRC staff provided a response to the industry, and the FAQ was finalized.

CONTACT: Ayesha Athar, NRR/DIRS/IRAB
301-415-1073

Inspection Manual Chapter 0611 Introduction

Staff discussed the issuance of Inspection Manual Chapter (IMC) 0611, which provides new documentation requirements for inspection reports. Staff discussed feedback the industry had provided based on the concept presented to them at an ROP public meeting about a year ago. Staff discussed a target timeframe for issuance of IMC 0611 in late calendar year (CY) 2017, with the procedure becoming effective in early CY 2018. NEI requested a draft version of IMC 0611. The draft version of IMC 0611 can be found in ADAMS at Accession No. ML17265A575.

Significance Determination Process Discussion

The staff briefed industry representatives on current and planned activities involving the SDP. These activities are focused on the following:

- Providing consistency across all seven cornerstones within the SDP
- Improving time and resources used for the implementing the SDP program (Staff Requirements Memorandum (SRM) M150806B), referred to as Inspection Finding Resolution Management (IFRM)
- Evaluating SDP-related ROP feedback forms (IMC 0801, "Inspection Program Feedback Process")
- Responding to Commission direction for developing the SDP for new reactors (SRM to SECY-13-0137) and streamlining the SDP (SRM M150806B)
- Evaluating opportunities to improve SDP screening questions
- Improving overall assessment of the SDP program (IMC 0307, "Reactor Oversight Process Self-Assessment Program")

In past ROP monthly meetings, Industry representatives had expressed a view that SDP final outcomes of deterministically-based cornerstones (i.e., emergency preparedness (EP), radiation protection (RP), and security) were not consistent with the more probabilistically-determined cornerstones (i.e., initiating events (IE), mitigating systems (MS) and barrier integrity (BI)). As a result, in the July 2017 ROP meeting, the staff requested industry representatives to provide explicit feedback so the staff could evaluate potential changes to the SDP. The staff received feedback that certain aspects of how SDP decisions are made in the EP cornerstone could be improved. No suggestions were offered by industry representatives for the RP and security cornerstones. The staff noted that it was waiting for industry representatives to provide feedback in this area by letter to the NRC.

The staff discussed the ongoing trial period of the IFRM, which is scheduled to end at the conclusion of CY 2017. Fundamental elements of the IFRM include improvement of NRC management oversight for greater than Green (GTG) inspection findings; the introduction of a 255-day metric, which tracks NRC performance for dispositioning inspection findings; reporting and assessing the significance of GTG inspection findings in the IE, MS, and BI cornerstones; and the Inspection Finding Review Board process outlined in IMC 0609, Attachment 05TP, "Inspection Finding Review Board." The staff reported that progress had already been realized during the trial period, with particular emphasis on the 120-day inspection metric, which is a part of the 255-day overall metric. The staff indicated that the IFRM metrics are meant to identify areas that could be improved within the inspection and SDP processes and that certain more complex inspection findings might take longer than the 255 days. The IFRM initiative addresses Commission direction to streamline the SDP (SRM M150806B).

The staff informed the industry representatives of actions being taken to address Commission direction to provide a qualitative structure for certain aspects of new reactor design and to provide clarity on the use of qualitative information for the current operating fleet (SRM to SECY-13-0137). One option being evaluated by the staff to address Commission direction is a significant revision to IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria." Other options are being pursued by the staff and those options will be discussed in a future ROP public meeting. The staff plans to draft a Commission paper in 2018 with the identified options.

As part of an effort to improve the efficiency of the SDP, the staff is evaluating how SDP screening questions could be improved. The staff discussed the large amount of resources and time the staff expends on inspection findings that do not screen to Green in Phase 1 of the SDP. These findings are assessed through a detailed risk evaluation, which often concludes that the inspection finding is of Green safety significance. As an initial effort, the staff plans to evaluate IMC 0609, Appendix A, "At-Power Significance Determination Process," to evaluate lessons learned to determine if the Phase 1 screening questions could appropriately screen inspection findings to Green more effectively.

The staff discussed the overall high level of activity ongoing with improving the SDP, as many SDP manual chapters are being either currently reviewed (IMC 0609, Appendices D, E, F, G, H, M and O) or being considered for future revision. The staff therefore asked for feedback from the industry representatives about which SDP appendices they believe should be addressed in a prioritized fashion.

The staff presented more specific information on plans to revise IMC 0609, Appendix F, "Fire Protection Significance Determination Process," and IMC 0609 Appendix E, "Security Significance Determination Process." A summary of the information discussed is provided below.

Update to IMC 0609, Appendix F, "Fire Protection Significance Determination Process"

IMC 0609, Appendix F is a screening tool for fire protection-related findings that occur during full power operation. The procedure includes qualitative screening questions and a conservative quantitative process to screen findings to Green. Findings that do not screen to Green are assessed using a detailed risk evaluation, which is not part of Appendix F. Appendix F is being revised based on inspector feedback that indicated the current procedure is cumbersome to use. The procedure is being reorganized for efficiency and updated with current fire protection-related information. In addition, the need to use the Fire Dynamics Tools spreadsheets is being removed. The changes will not impact the final risk significance determination for any greater than Green findings. The staff indicated that the revised procedure will be issued soon, but will not become effective until January 2018, so that inspectors can be trained on the revised process.

SDP for the Security Cornerstone

The staff discussed that the NRC's Office of Nuclear Security and Incident Response (NSIR) has chartered a task force to review the security SDP; the task force is comprised of regional security inspectors from all four regions; force-on-force (FOF) security inspectors; and staff members from NSIR, the Office of Nuclear Reactor Regulation, and the Office of Enforcement.

The task force has completed an evaluation of IMC 0609, Appendix E, Part I (Baseline Security SDP) and Part II (FOF SDP). The task force briefed NSIR management on recommended changes to the SDP in September 2017 and will conduct a closed meeting with the Industry in November 2017 to discuss the results of its evaluation and the proposed changes. The staff indicated the recommended changes to the SDP should be completed by July 2018.

Fee Billing Enhancements

NRC staff provided a presentation on fee billing enhancements, which is available in Enclosure 2 to this summary.

G. Bowman

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PUBLIC MEETING HELD ON SEPTEMBER 21, 2017**

Dated: October 16, 2017

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***concurred via email**

OFFICE	NRR/DIRS/IRAB	BC:NRR/DIRS/IRIB	BC:NRR/DIRS/IRAB	NRR/DIRS/IRAB
NAME	AAthar	SAnderson	GBowman	AAthar
DATE	10/10/2017	10/16/2017	10/16/2017	10/16/2017

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
September 21, 2017**

Alonzo Richardson	NRC	Robin Ritzman	First Energy
Russell Gibbs	NRC	Michael Murray	STPNOC
Michelle Kichline	NRC	Diane Aitken	Dominion Energy
Mike King	NRC	Peter Wilson	TVA
Steve Campbell	NRC	Ken Heffner	Certrec
Alex Garmoe	NRC	James Slider	NEI
Matt Humberstone	NRC	Greg Halnon*	FENOC
Dan Merzke	NRC	Larry Parker	STARS Alliance
Joanna Bridge	NRC	Erin Anners	SNC
Molly Keefe-Forsyth	NRC	Tony Zimmerman	Duke Energy
John Rutkowski*	NRC	Jeff Hardy	Entergy
Diane Sieracki*	NRC	Deann Raleigh	Curtiss Wright
Theresa Clark*	NRC	Daniel McGinnis	Dominion Energy
Richard Skokowski*	NRC	Chris Nolan	Duke Energy
Jimmy Wong*	NRC	Lenny Sueper*	Xcel Energy
Catherine Thompson*	NRC	Bruce Mrowca*	ISL
Chris Cahill*	NRC	Jim Landale*	Exelon
Wendy Reed*	NRC	Eric Lundell*	
Robert Krsek*	NRC	Jimmy Alldredge*	
Anne DeFrancisco*	NRC	Craig Stewart*	
		Richard Lemons*	Duke Energy
		Carlos Sisco*	Winston & Strawn

*participated via teleconference and/or
online meeting