




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

November 17, 2017

MEMORANDUM TO: Michael T. Markley, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation 

SUBJECT: SUMMARY OF OCTOBER 23, 2017, PUBLIC MEETING WITH  
NUCLEAR ENERGY INSTITUTE REGARDING 10 CFR 50.69  
LICENSE AMENDMENT REQUESTS

On October 23, 2017, a Category 2 public meeting<sup>1</sup> was held between representatives of the U.S. Nuclear Regulatory Commission (NRC), Nuclear Energy Institute (NEI), Electric Power Research Institute (EPRI), and other licensees. The purpose of the meeting was to discuss NEI's model license amendment request to implement a risk-informed program for categorization and treatment of structures, systems, and components (SSCs) for nuclear power reactors in accordance with Section 50.69, "Risk-informed categorization and treatment of structures, systems, and components for nuclear power reactors," of Title 10 of the *Code of Federal Regulations* (10 CFR 50.69). This public meeting was a continuation of public meetings held on August 18, 2016,<sup>2</sup> and January 25,<sup>3</sup> June 21,<sup>4</sup> and September 6, 2017,<sup>5</sup> on the same topic. This meeting focused on approaches to implementing 10 CFR 50.69 when a licensee did not have seismic probabilistic risk assessment (SPRA) or a seismic margins analysis.

During the meeting, the NEI staff presented slides that analyzed the value of including seismic hazards in the categorization of SSCs for sites that had high seismic hazards and had performed SPRAs.<sup>6</sup> The slides indicated that in the two examples, inclusion of the SPRA did not uniquely identify any SSCs with high safety significance (i.e., all SSCs identified by the SPRA were also identified as high safety significance by another model such as the fire probabilistic risk assessment). The conclusion of the analysis asserted that explicit consideration of seismic risks in the categorization process was not necessary.

<sup>1</sup> The meeting notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML17285A065.

<sup>2</sup> The meeting summary for the August 18, 2016, meeting is available under ADAMS Accession No. ML16250A548.

<sup>3</sup> The meeting summary for the January 25, 2017, meeting is available under ADAMS Accession No. ML17027A251.

<sup>4</sup> The meeting summary for the June 21, 2017, meeting is available under ADAMS Accession No. ML17177A063.

<sup>5</sup> The meeting summary for the September 6, 2017, public meeting is available under ADAMS Accession No. ML17265A020.

<sup>6</sup> The NEI slides (prepared by EPRI) are available under ADAMS Accession No. ML17296A563.

The NRC staff indicated that such an approach to the seismic component of 10 CFR 50.69 applications may be feasible, but indicated that it would be a deviation from the currently endorsed guidance. The NRC staff indicated that although not an exhaustive list, if such an approach was pursued, the following would need to be addressed:

- Justification for how the two studies presented can be generalized to be applicable for the remainder of the fleet
- Justification of any changes needed to address the impact on the categorization process:
  - Integrated importance assessment
  - Additional information that may need to be provided to the integrated decision-making panel
- Specific entry conditions of usage for the analysis such as:
  - Magnitude and spectrum of the site-specific seismic hazard
  - Containment type
  - Component limitations
  - Estimated seismic risk

The feedback provided by the NRC staff is not all-inclusive and it is possible that additional questions could arise during an actual review where this concept is applied.

No regulatory decisions were made and both the NRC staff and the NEI indicated that they would consider the items discussed in the meeting. The NRC staff will consider the possibility that this approach may necessitate modifications to the license condition described in RG 1.201, "Guidelines for Categorizing Structures, Systems, and Components in Nuclear power Plants According to Their Safety Significance."

Following the discussion, an opportunity was afforded to any other participants who wished to ask questions or make comments. No questions or comments were received.

The list of attendees is enclosed to this summary.

Enclosure:  
List of Attendees

**ENCLOSURE**  
**LIST OF ATTENDEES**

# Sign In Sheet

DATE: Oct 23, 2017

## Public Meeting With NEI to Discuss 50.69 Seismic Approaches

Name	Organization
Jana Bergman	CURTISS-WRIGHT/scientist
GREGORY KRUEGER	NEI
PHILIP J. TARPINAN JR.	EXELON
Gary DeMoss	PSEG
Patrick O'Regan	EPRI
EUGENE KELLY	EXELON Nuclear
Stacey Rosenberg	NRC/DRA
Michael Bino	NRC/DRA
Jonathan Evans	NRC/DRA
WILLIAM WEBSTER	DOMINION ENERGY
ED MILLER	NRC/DORL
<hr/>	
VIA PHONE	
ALLEN MOLDENHAUER	DOMINION
THOMAS JOHN	DOMINION
JOE VASQUEZ	DOMINION
ROCKY KREIDER	EPM
STEVEN DAWSON	SARGENT LUNDY

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# Sign In Sheet

DATE: Oct 23, 2017

Public Meeting With NEI to  
Discuss 50.69 Seismic  
Approaches

Name	Organization
John Richards	EPRI
Greg Hardy	SGH
Dan W. Wald	NRC/DRA
Adrienne Driven	NRC/DRA
STEPHEN DIASMORE	NRC/DRA/PLA

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SUBJECT: SUMMARY OF OCTOBER 23, 2017, PUBLIC MEETING WITH NUCLEAR ENERGY INSTITUTE REGARDING 10 CFR 50.69 LICENSE AMENDMENT REQUESTS DATED NOVEMBER 17, 2017.

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ADriver, NRR

DO'Neal, NRR

GEMiller, NRR

JEvans, NRR

MBiro, NRR

SDinsmore, NRR

SRosenberg, NRR

TWertz, NRR

**ADAMS Accession No. ML17305A242****\*via e-mail**

OFFICE	NRR/DORL/LSPB/PM	NRR/DORL/LSPB/LAiT	NRR/DORL/LSPB/LA
NAME	GEMiller	IBetts	JBurkhardt
DATE	11/17/2017	11/3/2017	11/6/2017
OFFICE	NRR/DRA/APLA/BC	NRR/DORL/LPL2-1/BC	NRR/DORL/LSPB/PM
NAME	SRosenberg	MMarkley	GEMiller
DATE	11/17/2017	11/17/2017	11/17/2017

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