



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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December 8, 2017

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

FROM: Joanna L. Bridge, Reactor Operations Engineer */RA/*
Reactor Oversight Process 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 NOVEMBER 16, 2017

On November 16, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a Reactor Oversight Process (ROP) Working Group (WG) public meeting with the Nuclear Energy Institute's (NEI's) ROP Task Force and other industry representatives. A summary of the discussion topics is provided below.

Enclosure 1 contains the meeting attendance list.

Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17342A364) contains the presentations and handouts discussed during the meeting.

Enclosure 3 (ADAMS Accession No. ML17342A393) 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, FAQs 17-04 and 17-05 were the only FAQs that were open at the

Enclosures:

1. Attendance List
2. Presentations and handouts
3. FAQs

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time of this meeting. NRC staff will review them and provide a response to the industry at the next ROP public meeting in January 2018.

Criteria for Closure of Inspection Procedure (IP) 95001

A brief discussion was held on the criteria for successful completion of Inspection Procedure (IP) 95001, "Supplemental Inspection Response to Action Matrix Column 2 Inputs," based on recent examples where these inspections were not completed successfully the first time. The NRC and the industry plan to have further dialog on this topic at a public meeting in 2018.

Significance Determination Process (SDP) Topics

The NRC summarized and provided feedback on an NEI letter on SDP updates and prioritization. The NEI letter was provided on October 12, 2017, and can be found via ADAMS Accession No. ML17338A031.

Industry is reviewing a revision to Inspection Manual Chapter (IMC) 0609, Appendix F, "Fire Protection Significance Determination Process." This revision was made publicly available in October 2017 (ADAMS Accession No. ML17089A411) to support discussion at this meeting. Industry representatives indicated that they intend to complete their review the revised document and provide the NRC with any feedback in mid-December.

The Divisions of Risk Assessment (DRA) and Inspection and Regional Support (DIRS) in the NRC's Office Nuclear Reactor Regulation (NRR) discussed a revision to IMC 0609, Appendix O, "Significance Determination Process for Mitigating Strategies and Spent Fuel Pool Instrumentation." The purpose of this revision is to address comments from the ROP feedback forms, with a goal of enhancing clarity of the screening questions in the SDP to reduce the number of cases where the SDP unnecessarily directs the inspector to IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria."

Consequential-Steam Generator Tube Rupture (C-SGTR)

The staff informed the public that they are updating the guidance in the Risk Assessment Standardization Project (RASP) Handbook for this area. Upon finishing its internal review to remove proprietary information, the staff will provide the ADAMS accession numbers of the guidance documents to the public and the industry.

Licensee Event Reporting

The Operating Experience Branch (IOEB) in the NRR is working to improve the licensee event report (LER) submission process under Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.73 through the use of a voluntary online LER submittal tool. IOEB briefed industry on the potential benefits of this initiative, including better capture of structured data, improved searchability and data accessibility for all users, consistent document quality, and reduced cost and burden to the NRC and licensees. Staff's presentation included a demonstration of a developmental version of the online LER submittal tool. Industry provided some initial feedback on the tool. At a future public meeting, staff hopes to learn more about licensees' internal LER review and submittal processes in order to determine what improvements can be made to the online LER submittal tool.

Engineering Inspections

The engineering inspection working group (EIWG) continues to make progress with both internal and external stakeholders and have obtained alignment on number of key points:

- 1) the heat sink and boric acid inspections can be accomplished as a focused sample during another inspection,
- 2) the in-service inspection can be improved by modifying both focus areas and agility,
- 3) the engineering design inspections can be improved by modifying both focus areas and agility,
- 4) the fire protection inspection can be improved by modifying both focus areas and agility,
- 5) the 10 CFR 50.59 inspection can be accomplished as a focused sample during a comprehensive engineering inspection, and
- 6) licensee activities that could result in the introduction of latent conditions should be inspected or assessed annually.

The next EIWG public meeting is scheduled on December 12, 2017, and is focused on addressing a number of important open items. The open items include:

- 1) the length of the inspection cycle or frequency of certain inspections,
- 2) how fire protection inspections should be accomplished in the future,
- 3) future comprehensive engineering inspections,
- 4) industry self-assessment initiative,
- 5) pilot of industry proposed self-assessment process,
- 6) measurement of effectiveness of changes to engineering inspection procedures, and
- 7) details and descriptions on what current industry performance indicators/practices could be used to reliably track engineering performance, as well as identify latent conditions

Working Group to Update the ROP for Regulatory Actions Taken Following the Fukushima Dai-ichi Accident

The ROP Inspection Branch (IRIB) in the NRR/DIRS shared with stakeholders that an NRC working group has been established to consider how to integrate oversight of regulatory actions taken by the NRC following the Fukushima Dai-ichi accident into the ROP. The charter for this working group can be found via ADAMS Accession No. ML17164A285. IRIB discussed the charter's scope, key expectations, communications, and milestones. The goal is to begin implementation of any new ROP program documents by January 1, 2020. As a minimum, communications with external stakeholders will occur upon commencement and completion of key milestones. Additional communication opportunities can be scheduled if desired.

Safety Culture Monitoring

The industry provided a brief on the updates being made to improve safety culture across the industry. Slides from this presentation can be found in Enclosure 2.

Actions from this Meeting:

- 1) Sunil Weerakkody (NRR/DRA) will provide the expected publication date of Regulatory Guide (RG) 1.174.
 - a. Answer: The estimated publication date for RG 1.174, Revision 3, is late-February/early-March 2018.
- 2) Sunil Weerakkody (NRR/DRA) will provide an update on RASP.
 - a. Answer: Once the draft RASP guidance on C-SGTR is made publicly available, the staff will make the ADAMS accession number available. The NRC will provide an update on this action at the next ROP public meeting.
- 3) Alex Garmoe (NRR/DIRS) will provide a status update on revisions to the IMC 0609 appendixes.
 - a. Answer:

SDP Appendix	Revision Currently in Progress?	Status/Notes
Appendix A – At Power SDP	No	Will need to be considered for new reactor revisions.
Appendix B – Emergency Preparedness SDP	No	Awaiting upcoming letter from NEI with industry perspectives on revising this Appendix.
Appendix C – Occupational Radiation Safety SDP	Yes	Draft update in progress – update was previously discussed at a public meeting, staff plans to solicit public feedback in early 2018.
Appendix D – Public Radiation Safety SDP	Yes	Draft update in progress – update was previously discussed at a public meeting, staff plans to solicit public feedback in early 2018.

Appendix E – Security SDP	Yes	Draft update in progress – closed meeting in December 2017 to discuss ongoing revision with industry.
Appendix F – Fire Protection SDP	Yes	Awaiting industry comments on draft revision, which was made publicly available in October 2017.
Appendix G – Shutdown SDP	No	Will need to be considered for new reactor revisions. Consider future revision to resolve numerous feedback forms.
Appendix H – Containment Integrity SDP	No	Will need to be considered for new reactor revisions. Consider future revision to disposition a feedback form on defining “close in population.”
Appendix I – Operator Requalification SDP	No	Draft update in progress – no change to content but Appendix will be reorganized to better sync with an upcoming IP 71111.11 update. No update needed for new reactors.
Appendix J – Steam Generator Tube Integrity SDP	No	None currently identified.
Appendix K – Maintenance Risk SDP	No	None currently identified.
Appendix L – B.5.b SDP	No	Consider whether this could be combined with the new mitigating strategies SDP.
Appendix M – Qualitative Criteria SDP	Yes	Staff working to clearly define the scope of the recommended update. Update will be provided as an option in response to SRM-SECY-13-0137 direction on considering use of qualitative factors for operating reactors. Will need to be considered for new reactor revisions.
Appendix O – Mitigating Strategies and Spent Fuel Pool SDP	Yes	Staff revising earlier draft to preclude premature entry into Appendix M. Will need to be considered for new reactor revisions.

- 4) NEI will send updated FAQs with serialized numbers.
 - a. Answer: FAQs with serial numbers are included in Enclosure 3.
- 5) NEI will coordinate with NRC to establish 2018 ROP public meeting dates.
 - a. Answer: In progress. An update will be provided at the next ROP public meeting

G. Bowman

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***concurring via email**

OFFICE	NRR/DIRS/IRAB	BC:NRR/DIRS/IRIB	BC:NRR/DIRS/IRAB	NRR/DIRS/IRAB
NAME	JBridge	SAnderson	GBowman	JBridge
DATE	12/4/17	12/7/17	12/7/17	12/8/17

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
November 16, 2017**

Steve Alferink	NRC	Munehisa Iwamoto	Japanese Electric Power Information Center
Eric Bowman	NRC	Eric Katzman	Next Era Energy
Gregory Bowman	NRC	Roy Linthicum	Exelon
Joanna Bridge	NRC	Daniel McGinnis	Dominion Energy
Robert Dexter	NRC	Larry Parker	STARS
Alex Garmoe	NRC	Deann Raleigh	Curtiss Wright
Tony Gody	NRC	Richard Rasmussen	Conger & Elsea
Jim Isom	NRC	Mark Reidmeyer	Certrec
Molly Keefe-Forsyth	NRC	Robin Ritzman	First Energy
Robert Krsek	NRC	Jim Slider	NEI
Michael Levine	NRC	Lenny Sueper	Xcel Energy
Benjamin Mabbott	NRC	Ryan Treadway	Duke Energy
Chris Miller	NRC	Steve Vaughn	NEI
Daniel Merzke	NRC	Andy Vomastek	Dominion Energy
Michael Montcalvo	NRC		
Ching Ng	NRC		
Caty Nolan	NRC		
William Orders	NRC		
Jesse Robles	NRC		
Kevin Roche	NRC		
Shane Sandal	NRC		
Stu Sheldon	NRC		
Eric Thomas	NRC		
Sunil Weer	NRC		
Diane Aitken	Dominion Energy		
Erin Anners	Southern Nuclear		
Rob Burg	EMP		
Christopher E. Earls	NEI		
Adam Goodman	Duke		
David Gudger	Exelon		
Lori Hayes	Duke		
Erin Henderson	TVA		
Greg Halnon	First Energy		

Please note that the attendance list may not include all attendees.