

January 3, 2018

MEMORANDUM TO: Sunil Weerakkody, Chief  
PRA Operations and Human Factors Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulation

FROM: Alexander Schwab, Project Manager /ra/  
ROP Support and Generic Communications Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE DECEMBER 14, 2017, PUBLIC PHONE CALL  
BETWEEN NRC STAFF AND THE NUCLEAR ENERGY INSTITUTE TO  
DISCUSS COMMON CAUSE FAILURE

On December 14, 2017, a Category 2 public phone call was held between the U.S. Nuclear Regulatory Commission (NRC) and stakeholders. The purpose of the phone call was to discuss the project plan the Nuclear Energy Institute (NEI) proposed for qualitatively addressing common-cause failure (CCF) with representatives of the industry.

The NRC began the call with an overall summary of their current comments and concerns about the whitepaper NEI had submitted (Agencywide Documents Access and Management System Accession Number ML17349A074) which detailed NEI's proposal for how to qualitatively address CCF. Specifically, the comments included the fact that consideration of qualitative factors may influence the quantified values in positive or negative direction, and that the NRC's development of alpha factors for their CCF calculations captures many of the qualitative factors that were discussed in the whitepaper. The NRC also mentioned that crediting qualitative factors could potentially be non-conservative if it does not take into account certain considerations, such as inter system dependencies.

The Nuclear Energy Institute began the call by stating that their goal with the whitepaper was to save resources, and that they wanted to do this by focusing on qualitative factors, not making adjustments to how the quantitative CCF contribution was calculated. They also mentioned that their desired end product for the whitepaper would most likely be some type of letter to the Division Director of the Division of Risk Assessment.

The NRC then discussed their plan to publish the revision to the CCF NUREG in the near future since it had already been out for public comment. The NRC also mentioned that the revision to the NUREG would include only the quantitative discussions, and that all the qualitative discussions on CCF would remain in the Risk Assessment Standardization Project Handbook.

The Nuclear Energy Institute also discussed their desire to work with the joint Pressurized Water Reactor Owners Group and Boiling Water Reactor Owners Group to update the CCF data to reflect the current CCF practices at nuclear power plants. They stated that they planned to attempt to go through all of the old data and characterize it by the end of 2018.

The NRC then discussed how they would like a revised version of the whitepaper addressing the comments already put forth by the NRC before they send it officially to the Regions for comment, so they wouldn't have to ask the Regions for comment more than once. The NRC also discussed the process of how they would be reviewing the whitepaper and subsequent iterations, and committed to getting a schedule together for the review process.

During the meeting the attendees were reminded that although their comments were discussed with the staff, no decisions would be made at the meeting. A list of meeting attendees is enclosed.

Please direct any inquiries to Alexander Schwab, Project Manager, at 301-415-8539, or via e-mail to [Alexander.Schwab@nrc.gov](mailto:Alexander.Schwab@nrc.gov).

Enclosure:  
List of Attendees

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**List of Attendees**

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TO DISCUSS COMMON CAUSE FAILURE**

**(CATEGORY 2 MEETING)**

**December 14, 2017**

<b>Name</b>	<b>Organization</b>
Greg Krueger	NEI
Jim Slider	NEI
Jeff Stone	Exelon
Fernando Ferrante	EPRI
Roy Linthicum	PWROG
Mark Brossart	Xcel Energy
David Bidwell	Jensen Hughes
Chris Cahill	NRC/Region I
George MacDonald	NRC/Region II
Rick Deese	NRC/Region IV
Steven Alferink	NRC/Region IV
Sunil Weerakkody	NRC/NRR/DRA
Jeff Mitman	NRC/NRR/DRA
Victoria Huckabay	NRC/NRR/DRA
Jeff Circle	NRC/NRR/DRA
Alexander Schwab	NRC/NRR/DIRS

Enclosure