

## Highlights of ROP / Fukushima Working Group Efforts

### Background

A NRC working group was established on October 2, 2017 to consider how to integrate the results of regulatory actions taken by the NRC following the Fukushima Dai-ichi accident into the ROP. The charter can be found in ADAMS under ML17164A285. Multiple NRC offices, including all Regions, are represented on the working group. The goal is to begin implementation of any new ROP program documents by January 1, 2020. The first milestone (March 31, 2018) is to develop final proposals (i.e. NRC management approval on proposal for inspection requirements, level of effort, resource estimates, etc.)

### Highlights of Effort to Date

- The working group has commenced looking into how to integrate oversight of FLEX into the ROP. If changes are being recommended, the group is considering affording inspectors flexibility in sample selection (i.e. no dedicated FLEX inspection sample requirements).
- The working group will be taking into consideration the current ROP basis per IMC 308, Attachment 2 (ML17114A050), as well as what level of Commission interaction would be needed per COMSECY 16-0022 (ML17132A359).
- Although work is still in progress, the group has currently given consideration to the following changes:
  - Revise IP 71111.01, “Adverse Weather Protection,” to allow for oversight of FLEX availability.
  - Revise IP 71111.15, “Operability Determinations and Functionality Assessments,” to allow for oversight of functionality assessments associated with FLEX.
  - Revise IP 71111.22, “Surveillance Testing,” to also allow for oversight of FLEX testing.
  - Revise IMC 2515D, “Plant Status” to allow for touring of FLEX storage buildings.

### Next Near-Term Efforts

- Continue considering what other aspects of FLEX may warrant oversight and potential IP revisions.
- Consider aspects of hardened containment vents, SAMGs, multi-source dose assessment, and focused evaluations & integrated assessments that may warrant oversight and potential IP revisions.
- Determine if the current ROP basis would support the proposed revisions, and if not, what additional changes / level of Commission interaction would be needed.
- Continue to engage external stakeholders and NRC management to solicit feedback.