



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

July 9, 2018

MEMORANDUM TO: Mark S. Miller, Director (Acting)
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Thomas R. Hipschman, Branch Chief */RA/*
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: PANEL FOR REVIEWING ISSUES IDENTIFIED DURING
PERFORMANCE OF TEMPORARY INSTRUCTION 2515/193

The purpose of this memorandum is to establish a panel to review issues identified during performance of Temporary Instruction (TI) 2515/193, "Inspection of the Implementation of EA-13-109: Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17249A105). Establishment of a panel will support achieving regulatory consistency when dispositioning identified issues. Inspections are estimated to commence in summer 2018 and be completed by the end of 2020.

A charter for the panel is enclosed. Panel members include representatives from the program office and all regions. The panel is expected to be in place until completion of inspection activities associated with TI 2515/193.

Enclosure:
As stated

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OF TEMPORARY INSTRUCTION 2515/193

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ADAMS Accession No. ML18141A653

***via email**

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DATE	05/23/18	05/21/18	05/23/18	05/25/18
OFFICE	NRR/DIRS/IRAB/BC	RI/DRP	NRR/DLP/D	RI/DRS*
NAME	GBowman*	RLorson*	LLund	JYerokun
DATE	05/24/18	06/18/18	06/08/18	06/18/18
OFFICE	RII/DRP*	RII/DRS*	RIII/DRP*	RIII/DRS*
NAME	JMunday	OLopez-Santiago	PLouden	KO'Brien
DATE	06/28/18	06/28/18	06/19/18	06/19/18
OFFICE	RIV/DRS*	RIV/DRP*		
NAME	MShaffer	AVegal		
DATE	06/20/18	06/20/18		

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PANEL FOR REVIEWING ISSUES IDENTIFIED
DURING PERFORMANCE OF TEMPORARY INSTRUCTION 2515/193

Objective

The panel will help promote the achievement of regulatory consistency when dispositioning issues identified during performance of Temporary Instruction (TI) 2515/193, "Inspection of the Implementation of EA-13-109: Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17249A105). The panel will achieve this objective by providing a forum for regional and headquarters staff to discuss and obtain consensus on identified issues.

Other issues related to EA-13-109 (ADAMS Accession No. ML13143A321) may be raised for panel discussion upon request.

Background

Following the earthquake and tsunami at the Fukushima Dai-ichi nuclear power plant in March 2011, the NRC ordered licensees of boiling-water reactors (BWRs) with Mark I and Mark II containment designs to install a hardened containment vent system (HCVS). At Fukushima, limitations in time and unpredictable conditions associated with the accident significantly challenged attempts by the responders to preclude core damage and containment failure. In particular, the operators were unable to successfully operate the containment venting system.

Order EA-13-109 requirements ensure that BWR Mark I and Mark II containments have reliable hardened venting capability. Order EA-13-109 requires installation of reliable hardened wetwell vents that not only will assist in preventing core damage when normal containment heat-removal capability is lost, but also will function in severe accident conditions (i.e., after core damage has occurred). Severe accident conditions include the elevated temperatures, pressures, radiation levels, and concentrations of combustible gases, such as hydrogen and carbon monoxide that could result from accidents involving extensive core damage, including accidents involving a breach of the reactor vessel by molten core debris. The order includes provisions for the control of combustible gasses and for equipment operation in post-core-damage radiation environments. The order was structured as having two phases with different implementation schedules. Phase 1 requires installation of a severe-accident-capable hardened wetwell venting system. Phase 2 requires licensees to either install a severe-accident-capable drywell venting system or develop and implement a reliable containment venting strategy that makes it unlikely that a licensee would need to vent from the containment drywell during severe accident conditions.

TI 2515/193 was issued in October 2017. The purpose of the TI is to confirm implementation of Order EA-13-109. Inspections are estimated to commence in summer 2018 and be completed by the end of 2020. Additional background information can be found in TI 2515/193.

Scope

The panel will discuss and obtain consensus on all issues identified during performance of TI 2515/193. Aspects to be discussed include the identified issue of concern, associated performance deficiency, finding determination (i.e. minor or more-than-minor), and significance determination. Attachment 1, "TI 2515/193 Inspection Issue for Panel Discussion," provides a worksheet for discussing such aspects, and will be provided to panel members prior to panel meetings.

The panel does not take the place of a Significance and Enforcement Review Panel (SERP). All potentially greater than green findings and any violations of Severity Level III or higher will be evaluated via a SERP.

Participation

The panel will consist of a member from each organization as indicated in Table 1, "List of Panel Members." Panel members may designate representatives to attend meetings in their place. If the group determines that additional expertise and involvement is needed, additional staff may participate in meetings as necessary. In addition, NRR/DIRS/IRIB will coordinate overall project management of the panel effort.

Table 1: List of Panel Members
Organization
NRR/DIRS
NRR/DLP
Region I
Region II
Region III
Region IV

Meetings

Panel members will meet when an issue is identified during performance of TI 2515/193. NRR/DIRS/IRIB will coordinate meeting schedules. In preparation for each meeting, the presenter for each identified issue shall complete the worksheet in Attachment 1, "TI 2515/193 Inspection Issue for Panel Discussion." If there are multiple issues at one site, a separate worksheet for each issue will be completed. Worksheets will be provided to NRR/DIRS/IRIB at least five business days prior to a scheduled meeting. NRR/DIRS/IRIB will then forward the worksheets to all panel members.

A meeting quorum consists of all panel members (or their designated representatives). At the meeting, NRR/DIRS/IRIB will facilitate the discussion. After the discussion, panel members will vote on how to disposition the issue. Issues should be elevated with management if there is a concern with the outcome of a vote. NRR/DIRS/IRIB will document a summary of panel meetings.

Communications

A SharePoint site for the panel will be established by NRR/DIRS/IRIB with links provided to panel members. The SharePoint site will contain completed Attachment 1 worksheets, a summary of panel meetings, and other information deemed necessary by panel members.

Disband

The panel will disband upon completion of all efforts associated with TI 2515/193 inspections.

TI 2515/193 Inspection Issue for Panel Discussion

Site/Plant Name:

1. What is the Issue of Concern?
2. Is this Issue of Concern similar to ones that were previously dispositioned by the panel? If yes, briefly describe the issue and the final outcome of that issue.
3. Does the Issue of Concern meet the criteria for Traditional Enforcement? If yes, discuss the violation, the bases for traditional enforcement, and the Severity Level.
4. Is there a Performance Deficiency? Discuss the justification for the determination, including the regulation or standard that was not met.
5. Is the Performance Deficiency a Finding? Discuss the justification for the determination.
6. If a finding exists, what is the proposed color? Discuss which Appendixes of IMC 0609, "Significance Determination Process," were used and briefly discuss the bases for the determination.