



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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June 12, 2018

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

FROM: Joanna Bridge, Reactor Operations Engineer */RA/*  
Reactor Oversight Process Assessment Branch  
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING  
GROUP PUBLIC MEETING HELD ON MAY 24, 2018

On May 24, 2018, 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, which is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML18145A252, contains the Performance Indicator (PI) Frequently Asked Question (FAQ) Log, the FAQs discussed during the meeting, and NEI 99-02 white papers.

Enclosure 3 (ADAMS Accession No. ML18164A085) contains the meeting briefing material for the staff's discussion of the Reactor Oversight Process self-assessment for calendar year (CY) 2017.

Enclosures:  
As stated

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### Frequently Asked Questions

FAQs 18-01, 18-02, and 18-03 were open at the time of this meeting.

FAQ 18-01 requested to clarify the definition of “initial transient” for boiling water reactors in the unplanned scrams with complications PI. Staff and the ROP Task Force previously discussed and agreed upon proposed wording for the definition at the April 5, 2018, ROP public meeting, and changed the status of the FAQ to tentatively approved. There were no further comments on the proposed resolution at this meeting and the status was changed to final approved.

FAQ 18-02 requested to delay the effective date of the IE01 and IE03 PIs for Watts Bar Unit 2 until the third quarter of CY 2018 “to allow sufficient data for an accurate assessment value.” A proposed NRC response to FAQ 18-02 was made publicly available on March 30 (ADAMS Accession No. ML18088A821). Following discussion at the April 5, 2018, ROP public meeting, the licensee submitted Revisions 1 and 2 of the FAQ (ADAMS Accession Nos. ML18136A858 and ML18136A865, respectively). An updated proposed NRC response was made publicly available on May 17, 2018 (ADAMS Accession No. ML18136A868). After some discussion at this meeting, the status of the updated FAQ response was changed to tentatively approved.

FAQ 18-03 requested a plant-specific exemption from the guidance related to the unplanned scrams with complications PI for Columbia due to unique circumstances surrounding a plant scram that occurred on August 20, 2017. A proposed NRC response to this FAQ was made publicly available on April 27, 2018 (ADAMS Accession No. ML18116A107). There was no further discussion on the proposed response at this meeting and the status of the FAQ response was changed to final approved.

### ROP Self-Assessment SECY Paper

The staff presented the results of the ROP self-assessment for CY 2017, which was provided to the Commission in SECY-18-0045, “Reactor Oversight Process Self-Assessment for Calendar Year 2017,” and is available in ADAMS at Accession No. ML18059A155. The self-assessment program evaluates 26 performance metrics. In 2017, the staff found that they met the Green performance criteria for 22 of those metrics. Three of the metrics were Red and one was Yellow, which indicates that additional attention is warranted in those areas. Two of the Red metrics were established last year by the staff in areas which were self-identified as needing additional focus, and this is the first year the staff is reporting on them. The staff is taking action to improve performance in each of these four areas. The staff also discussed the CY 2018 effectiveness reviews that are ongoing or completed. The first is on the Inspection Finding Resolution Management (IFRM) process, the second is to assess the impact of changes made in 2016 to Inspection Procedure (IP) 95001, and the third is to look at previous initiatives associated with safety culture. The staff will also conduct a baseline inspection procedure assessment in CY 2018, along with the next regional peer review, which will be looking at Region III.

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

The NRC staff from ROP Inspection Branch (IRIB) provided an update on the ROP Fukushima working group's efforts. IRIB also indicated that due to on-going discussions, current plans may change. IRIB discussed that the current plan was to revise IMC 2515, "Light-Water Reactor Inspection Program – Operations Phase," to add guidance for what may constitute a risk-informed FLEX inspection sample, and to revise IMC 2515, Appendix D, "Plant Status," to reiterate that plant tours can also include FLEX storage areas. IRIB also indicated that there is a plan to revise IP 71111.18, "Plant Modifications" to allow for oversight of revisions to site-specific Severe Accident Management Guidelines based on future revisions to the Pressurized and Boiling Water Reactor Owners Group generic guidance.

Note: Due to internal NRC discussions held after the ROP public meeting, staff plans for incorporating Fukushima-related actions into the ROP have changed. External stakeholders will be provided an update at the next ROP public meeting.

### Significance Determination Process Updates

The NRC staff from ROP Assessment Branch (IRAB) provided an update on several ongoing activities involving revisions to Inspection Manual Chapter (IMC) 0609, "Significance Determination Process." This information generally echoed information previously made publicly available in Enclosure 1 to SECY-18-0045, "Reactor Oversight Process Self-Assessment for Calendar Year 2017" (discussed above).

Regarding the Radiation Protection Significance Determination Process (SDP), the staff relayed that changes are being made as outlined in the aforementioned SECY, a more detailed update on the status will be given at a subsequent ROP public meeting, and a draft of the changes to IMC 0609, Appendix D, "Public Radiation Safety Significance Determination Process," are expected to be made publicly available at that time.

The staff also relayed that the new revision of IMC 0609, Appendix F, "Fire Protection Significance Determination Process," was issued on May 2, 2018, and is available on the NRC's external website.

Regarding the use of qualitative factors in SDP, the staff reminded the audience that this is a long-standing revision effort, with some recent changes in direction. Specifically, due to the lack of broad alignment on prior approaches, a more targeted update is now underway that focuses on clarification of existing entry conditions and clarification of existing decision-making attributes. Over the coming months, the staff will engage external stakeholders through ROP public meetings, and intends to issue the new revision of IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria," by the end of the calendar year.

During later discussions it was also relayed that revisions will be ongoing to IMC 0609, Appendix O, "Significance Determination Process for Mitigating Strategies and Spent Fuel Pool Instrumentation."

Finally, related to SDP, staff discussed that a focused self-assessment activity under IMC 0307, "Reactor Oversight Process Self-Assessment Program," has begun for the Emergency Preparedness (EP) SDP. This is consistent with a recent NRC letter, which was issued on February 7, 2018, and is publically available in ADAMS at Accession No. ML18024A427, indicating that the staff would be taking a fresh look at IMC 0609, Appendix B, "Emergency Preparedness Significance Determination Process." The staff indicated that it plans on

conducting an initial public meeting on this assessment in late June. The staff indicated that the effort is expected to involve additional public meetings later in the process, and that the staff anticipates developing a Commission paper conveying the results and recommendations.

### ROP Transformation

The industry presented on a letter entitled, "Transforming the Reactor Oversight Process to a New Paradigm," from Greg Halnon, Chairman of the National/Regional Utility Group, to Chris Miller, Director of the Division of Inspection and Regional Support in the NRC's Office of Nuclear Reactor Regulation. The letter can be found in ADAMS at Accession No. ML18127A080. The NRC briefly described the numerous transformation ideas and ongoing activities related to the ROP. The NRC and the industry agreed on the need for further discussion on this topic and the need to develop a path forward for addressing these comments. This topic will be addressed at a future ROP public meeting.

### Actions from this Meeting

The June ROP public meeting is canceled.

ROP feedback forms are not public documents. As such, when publishing change notices that reference ROP feedback forms, industry requested that consideration be given to more fully explain the reason/action/issue for the changes, rather than just indicating the changes were to address ROP feedback forms. (Action: NRR/DIRS/IRGB)

Add an agenda item for industry feedback on the new inspection report format to a future ROP public meeting. (Action: NRR/DIRS/IRIB)

Work with staff from the Office of Nuclear Security and Incident Response to add a topic on "Cyber Security Inspection URIs and Milestone 8" to future ROP public meeting. (Action: NRR/DIRS/IRIB)

Add an agenda item for a future ROP public meeting to provide an explanation of how the NRC develop estimates for the total charges associated with the inspection program. (Action: NRR/DIRS/IRAB and NRC/OCFO)

Add an agenda item for a future ROP public meeting to discuss ROP timeliness metrics and related findings from the IFRM effectiveness review. (Action: NRR/DIRS/IRAB).

Add an agenda item for a future ROP public meeting to discuss the NRC's process for dispositioning findings from the Temporary Instruction 191 inspections. (Action: NRR/DIRS/IRAB)

Add an agenda item for a future ROP public meeting for continued discussions on ROP transformation and the path forward to assess the various recommendations. (Action: NRR/DIRS/IRAB)

Add an agenda item for a future ROP public meeting to discuss NRC's activities associated with backfit training for NRC staff. (Action: NRR/DIRS/IRAB)

Add an agenda item for a future ROP public meeting to provide an update on the NRC's work to update IMC 0609, Appendix D. (Action: NRR/DIRS/IRAB)



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PUBLIC MEETING HELD ON MAY 24, 2018

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**ADAMS Package No. ML18164A074**

**ADAMS ACCESSION No. ML18164A078**

**\*concurring via email**

OFFICE	NRR/DIRS/IRIB*	BC:NRR/DIRS/IRAB*	NRR/DIRS/IRIB
NAME	JBridge	GBowman	JBridge
DATE	6/08/18	06/11/18	6/12/18

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
May 24, 2018**

Erin Anners	Southern Nuclear	Ryan Alexander	NRC
Steve Catron	NextEra Energy	Melissa Ash	NRC
John Costello	Dominion Energy	Ayesha Athar	NRC
Steven Dolley	S&P Global Platts	Greg Bowman	NRC
David Gudger	Exelon	Joanna Bridge	NRC
Greg Halnon	First Energy	Patrick Castleman	NRC
Ken Heffner	Certrec Corporation	Raymond Gibson	NRC
Kimberly Hulvey	TVA	Ravi Grover	NRC
Greg KRUEGER	NEI	Don Helton	NRC
Roy Linthicum	PWROG	Tom Hipschman	NRC
Daniel McGinnis	Dominion Energy	Tara Inverso	NRC
Bruce Mrowca	ISL Global	Mike King	NRC
Marty Murphy	Xcel Energy	Robert Krsek	NRC
Chris Nolan	Duke Energy	Aron Lewin	NRC
James Pak	Dominion Energy	Mark S. Miller	NRC
Larry Parker	Star Alliance	John Rutkowski	NRC
James Polickoski	TVA		
Deann Raleigh	Curtis Wright		
Tim Riti,	NEI		
James Slider	NEI		
Danny Stephens	Columbia Generating Station		
Leonard Sueper	Xcel Energy		
Tyler Swearingen	Dominion Energy		
Tony Zimmerman	Duke Energy		

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