



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MEMORANDUM TO: Dennis C. Morey, Chief
Licensing Processes Branch
Division of Licensing Projects
Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager
Licensing Processes Branch */RA/*
Division of Licensing Projects
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER 25, 2018, MEETING TO DISCUSS THE
NUCLEAR REGULATORY COMMISSION STAFF FEEDBACK ON
ENTRY CRITERIA FOR OPERABILITY DETERMINATION

On October 25, 2018, U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 meeting with representatives from the Nuclear Energy Institute (NEI) and industry. This group will be collectively called the industry in this summary. This was the second in a series of meetings discussing the operability determination process enhancements that the industry is working on through its draft guidance contained in NEI 18-03, "Operability Determination."

One purpose of the meeting was for the NRC staff to provide feedback on NEI entry criteria for operability determinations. All information related to the meeting and discussed in this summary can be found in the Agencywide Documents Access and Management System Accession (ADAMS) Package No. ML18204A032.

In its presentation, found in the reference ADAMS package, the NRC staff provided its understanding that the entry criteria do not represent an operability determination. Rather, the three required entry criteria are a screening mechanism to determine if a licensee needs to enter the documented operability determination process. In addition, the NRC staff stated that it did not have an objection to the position industry was taking but the proposed 10-percent criterion could be challenged for adequacy during inspections. Industry agreed and said this was a topic where more interaction in the future would be beneficial.

Next, industry gave a presentation, which is in the reference ADAMS package. The presentation focused on:

- The industry's separation between issue management using its corrective action program (CAP) and its proposed operability determination process,

CONTACT: Joseph J. Holonich, NRR/DLP
301-415-7297

- Those items the industry does not plan to incorporate into its draft operability guidance which are currently included in the NRC's Manual Chapter 0326, "Operability Determinations & Functionality Assessments for Conditions Adverse To Quality Or Safety"; and
- A set of definitions the industry proposed to incorporate into its operability guidance, including a definition for specified safety function (SSF).

The industry identified two key points regarding its proposed definition of SSF.

First, the industry stated its belief that the specified safety function must be a function that requires limiting conditions for operation (LCOs) to be met; and secondly, that the SSFs are plant specific and depend on the Technical Specification related licensing basis documentation. The industry proposed that the SSF would be defined by:

- the analyses summarized in the Updated Final Safety Analysis Report, Chapters 6 and 15 (or the plant-specific equivalent chapters), and
- those subset of functions that meet one or more criterion in Title 10 of the *Code of Federal Regulations*, Section 50.36(c)(2)(ii)

During the discussions, the NRC staff asked a number of questions to clarify topics or to gain a better understanding of the industry's proposal.

At the end of the meeting, all participants agreed that there was good dialogue on the topics. Several areas were identified to consider for future meetings. Industry committed to look at what topics would be ready for discussion at the next meeting.

NRC staff proposed that some future meetings would be held in the NRC regional offices. Potential dates for the next meeting were discussed.

Following the meeting, a stakeholder provided comments on NEI 18-03, "Operability Determination," via email. NEI 18-03 and the full text of the comments can be found in the referenced meeting package. Overall, the stakeholder commented that Sections A5 through A7 of the NEI 18-03 draft provided at the June 2018 public meeting have several shortcomings related to the treatment of the American Society of Mechanical Engineers (ASME) structures, systems, and components (SSCs).

"The sections lack structure and provide pointers to several documents of secondary importance in the understanding of the cause of damage, and in the evaluation of adequacy of ASME SSCs. Instead, NEI 18-03 should structure the evaluation of ASME SSCs to address: (1) wall thinning, (2) crack-like flaws, (3) embrittlement, (4) overload, and (5) loss of active function. In all these cases NEI 18-03 should point to industry and NRC agreed-upon methods and criteria. Otherwise, NEI 18-03 could simply defer to ASME III, ASME XI, and ASME Operation and Maintenance."

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SUBJECT: SUMMARY OF OCTOBER 25, 2018, MEETING TO DISCUSS THE NUCLEAR REGULATORY COMMISSION STAFF FEEDBACK ON ENTRY CRITERIA FOR OPERABILITY DETERMINATION DATE: NOVEMBER 28, 2018

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ADAMS Accession Nos. ML18204A043-Summary; ML18204A032-Package

*concurrence via email

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NAME	JHolonich	KO'Brien	JMarshall	DMorey	JHolonich
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