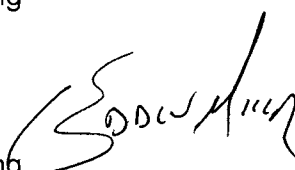




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 21, 2018

MEMORANDUM TO: Douglas A. Broaddus, Chief  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager   
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF SEPTEMBER 6, 2018, PUBLIC MEETING WITH  
NUCLEAR ENERGY INSTITUTE REGARDING PROBABILISTIC  
RISK ASSESSMENT CHANGE CONTROL PROCESS

On September 6, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting<sup>1</sup> with industry representatives including staff from the Nuclear Energy Institute (NEI), NextEra, and the Pressurized Water Reactor (PWR) Owners Group. The purpose of the meeting was to discuss licensee control over the development of new methods for use in their probabilistic risk assessment (PRA) following approval of an amendment to implement, for example, a risk-informed completion time (RICT) program. Specifically, the meeting was primarily to provide NRC staff feedback regarding an NEI proposal for how newly developed PRA methods would be controlled (i.e., accepted for use without prior NRC staff review and approval). This process should include determining when a change in PRA methods would require a licensee to seek regulatory approval prior to implementation of a newly developed. The NRC staff noted its concern that applying a time-frame (e.g., 30 days following submission to the NRC) for the use of newly developed methods could be viewed as tacit approval. NEI indicated that this was not the intent.<sup>2</sup> In addition, the meeting provided NRC feedback regarding a June 14, 2018, letter sent by NEI<sup>3</sup> withdrawing a request for review of NEI 16-04, "New PRA Method Evaluation Process Guidelines."

During the meeting, the NRC staff presented slides that provided NRC perspective on NEI's proposal and letter.<sup>4</sup> The slides also provided the status, outstanding challenges, and next steps for a number of NRC staff efforts currently underway that would support implementation of a PRA methods change control process. It is noted that the slides refer to a license condition in the Technical Specifications Task Force (TSTF) traveler that governs new PRA methods whereas the restriction for risk-informed completion time programs is included in the administrative section of the TSs.

<sup>1</sup> The original meeting notice is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML18208A503.

<sup>2</sup> The NEI proposal is available under ADAMS Accession No. ML18124A307.

<sup>3</sup> The NEI letter is available under ADAMS Accession No. ML18183A059.

<sup>4</sup> The NRC slides are available under ADAMS Accession No. ML18247A148.

Following this presentation, the NRC staff also presented slides<sup>5</sup> describing several enhancements and changes that NRC has suggested to be incorporated to next revision of Regulatory Guide 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," to support this activity. There was general agreement with the NRC staff initiative to define a number of PRA terms; however, industry representatives expressed some reservation with the current wording of some definitions and indicated that they would work with the NRC to resolve these issues. Some industry representatives, although in agreement with some of the NRC staff proposed changes, believed the changes may be more appropriate in the PRA standard.

Additionally, both the NRC and industry acknowledged that there were existing change control processes (e.g., Section 50.59 of Title 10 of the *Code of Federal Regulations*) that could serve as a lodestar for crafting this process. It was further acknowledged that one or more workshops would be an appropriate vehicle for development of this process.

No regulatory decisions were made and both the NRC staff and the NEI indicated that they would consider the items discussed in the meeting. It was agreed that further interaction is needed to continue discussion of this topic. In the near future, it was agreed that a list of items be developed and both parties would interact to determine priority and scheduling for addressing the items.

Following the discussion, an opportunity was afforded to any other participants who wished to ask questions or make comments. Two questions or comments were received in the meeting and were responded to by NRC and other meeting participants.

Enclosure:  
List of Attendees

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<sup>5</sup> The NRC slides are available under ADAMS Accession No. ML18247A144.

# Sign In Sheet

DATE: Sept 6, 2018

Public Meeting to Discuss  
Usage of New PRA Methods

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Name	Organization
Sunil Weerakkal	NRC
Ray Cinthicum	PURPOG
Victoria Anderson	NEI
OWEN SCOTT	SOUTHERN NUCLEAR
FARAMARZ DOORMI	Southern Nuclear
GENE KELLY	Exelon
GREG KRUEGER	NEI
Stephen Geier	NEI
Reed Lutzke	Westinghouse
Robert Rischel	BWR OG / Duke Energy
GREG CASTO	NRC/DRA
GREGORY SUPER	NRC/NRR/DORA
Felix Gonzalez	IAEA/RESOLVE
Stephen Dinsmore	NRC/NRR/PRA
Scrathin Evans	NRC/NRR/DRA
Matthew Leach	NRC/NRR/DRA
Shulp Vasanada	NRC/NRR/DRA
Brian Metzger	NRC/NRR/DRA
MIKE MONTECALVO	NRC/NRR/DRA
Jana Bergman	CURTISS-LORIGHT
Michael Markley	NRR/DORA/LPL2-1
Mike FRANOVICH	NRR/DRA
Mehdi ReisiFard	NRC/NRR/DRA
Stacey Resnikoff	NRC/NRR/DRA



SUBJECT: SUMMARY OF SEPTEMBER 6, 2018, PUBLIC MEETING WITH NUCLEAR ENERGY INSTITUTE REGARDING PROBABILISTIC RISK ASSESSMENT CHANGE CONTROL PROCESS DATED SEPTEMBER 21, 2018

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**\*via e-mail**

OFFICE	NRR/DORL/LSPB/PM	NRR/DORL/LSPB/LA	NRR/DRA/APLA/BC
NAME	GEMiller	JBurkhardt	SRosenberg
DATE	09/18/18	09/18/18	09/18/18
OFFICE	NRR/DORL/LSPB/BC	NRR/DORL/LSPB/PM	
NAME	DBroaddus (JBoska for)	GEMiller	
DATE	09/21/18	09/21/18	

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