



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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December 14, 2018

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

FROM: Mary T. Anderson */RA/*
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Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING
GROUP PUBLIC MEETING HELD ON NOVEMBER 15, 2018

On November 15, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff conducted 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 public meeting notice was issued on November 2, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18313A100). A summary of the discussion topics is presented in this memorandum. The enclosure contains the meeting attendance list.

ROP Enhancement Recommendations

An internal NRC transformation initiative received 72 recommendations related to the ROP (ADAMS Accession No. ML18292A594). In addition, both the National Regional Utilities Group (NRUG) and NEI submitted letters to the NRC outlining industry perspectives and suggestions on how the ROP can be enhanced (ADAMS Accession Nos. ML18127A080 and ML18262A322).

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The NRC staff subsequently binned all recommendations by thematic area, shown below, and is continuing to work on project plans being developed for each thematic area. The focus of the plans is to provide an overarching structure for evaluation and disposition to include key elements such as decision making, drivers for change, and the basis for change while being consistent with NRC Principles of Good Regulation. The thematic areas and assigned NRC staff leads are noted below:

<i>ROP Enhancement Project Team</i>	
SES Sponsor	Ho Nieh
Managers	Chris Miller/Greg Bowman
Team Leader	Russell Gibbs
Assistant Team Leader	Mary Anderson
<i>NRC Thematic Lead(s)</i>	
<i>Themes</i>	
Alex Garmoe/Greg Bowman	Assessment
Alex Garmoe/Greg Bowman	MSPI
Antonios Zoulis/CJ Fong	SDP Infrastructure
Carla Roque-Cruz/Patricia Silva	ISFSI
Tim Reed/Doug Broaddus	Licensing/Backfit
Ami Agrawal/Tom Hipschman	ROP Inspection
Don Johnson/Bob Kahler	Emergency Preparedness
Dave Garmon/Kevin Hsueh	Radiation Protection
Alonzo Richardson/Doug Hyuck	Security

The NRC discussed the project plans with industry and the public. The discussions aimed to reach a common understanding of the recommendations, their priority, and an approximate schedule for implementation of potential changes to the ROP.

Assessment

The staff identified the industry ROP enhancement recommendations that were binned into the Assessment thematic area. Industry provided introductory remarks explaining the basis behind each recommendation. The staff identified four recommendations in which early work towards dispositioning has been undertaken. These four recommendations are 2A (revise public communications on white findings), 2B.5 (promptly close white findings), 2B.6 (redefine finding labels), and 4C (open up communications about inspection results). After discussing item 4C, it was determined that the issue is broader than just the ROP, and thus may no longer be a candidate for near term dispositioning. The staff noted that items 2B.1 (combine columns 1 and 2), 2B.2 (follow-up via resident inspectors), and 4D (standardize issue escalation process) were likely longer term items. The staff will continue ongoing work toward dispositioning the recommendations and will provide additional details at the next ROP public meeting.

MSPI

The staff opened discussion on recommendation 1G to revise the use of the Mitigating Systems Performance Index (MSPI) performance indicator. Industry provided background information on the recommendation, focused generally on the resource burden to collect and analyze the data with limited return on resources expended. The staff noted that MSPI is challenging to inspect and it is not readily understood by the public. There was general agreement that exploring ways to modify MSPI is worthwhile. Industry indicated that they have commenced early work on a

possible improvement that would focus on collective changes to core damage frequency, but was not ready to discuss in more detail. The staff suggested that any proposed modification or replacement should be more straightforward and less burdensome than the existing MSPI. The proposal will be discussed in more detail at future public meetings once the industry's proposal is further developed.

SDP Infrastructure

The staff discussed industry comments and internal Agency recommendations specific to ROP Enhancement. Industry provided background on their recommended enhancements.

An industry and NEI representative discussed the importance of gaining alignment on key inputs to the SDP such as common-cause failures, human reliability analysis, and the exposure time of a degraded condition (Recommendation 3D). Industry and the NRC were aligned that these are important drivers of an analysis and would look into enhancing how those inputs are determined and shared with industry during the SDP.

With regard to IMC 0609 Appendix M, "Significance Determination Process Using Qualitative Criteria," (Recommendation 3C), industry was open to proposed changes and asked to be kept abreast of the changes through the normal ROP monthly meetings.

Regarding Recommendation 3B, industry further acknowledged the NRC's viewpoint that is best kept separate from other SDPs, due to its unique role in processing findings associated with equipment that fulfills a 10 CFR 50.54(hh)(2) security-related regulatory requirement (B.5.b).

There was discussion of using a portal to access the licensee's models in lieu of using the NRC's Standardized Plant Analysis Risk (SPAR) models (Recommendations 3F and 3G). Industry indicated that this was preliminary and they were open to the NRC's suggestion to utilize external hazard information on a trial basis through this process as a first step into further evaluation of this enhancement. NRC referred to previous efforts to reevaluate the use of SPAR and referenced a report that is publicly available, which may be pertinent to these enhancement efforts (ADAMS Accession No. ML18173A253).

ISFSI

An industry representative provided clarification on Recommendation IH related to independent spent fuel storage installation (ISFSI) inspections. The representative clarified Recommendation IH for the elimination of ISFSI inspection activities to the potential reduction of the number of hours and resources utilized at ISFSIs located at operating reactors. The representative proposed an inspection model similar to NRC Region II, in which the resident inspector staff completes ISFSI inspections. The NRC staff shared concepts from the ROP enhancement project plan for this recommendation and explained that the Office of Nuclear Material Safety and Safeguards (NMSS) was considering reducing the hours and eliminating Inspection Procedure 60855.1 ISFSI inspection from IMC 2515, Appendix C, "Special and Infrequently Performed Inspections." Additional interactions with internal and external stakeholders are tentatively proposed for early 2019.

Licensing/Backfit

Industry presented their recommendations to NRC staff (4A and 4B). The NRC staff briefly introduced a related low-risk design compliance process suggestion stemming from the

feedback solicitation that occurred under the SECY-18-0060, "Achieving Modern Risk-Informed Regulation," initiative. The NRC staff discussed the ongoing efforts with respect to backfit, the Task Interface Agreement (TIA) process and 10 CFR 50.59. Specifically, the NRC staff discussed the changes to the backfit policy (in the form of a revised management directive), the ongoing efforts to update the agency backfit guidance, in the form of a revised NUREG, and the previous training provided to NRC staff in 2017 and 2018. The NRC emphasized that the changes to the backfit policy make it clear that the burden is on the NRC staff when NRC is considering imposing changes to the approved licensing basis for a facility. The NRC staff's proposed backfitting changes to NRC Management Directive 8.4, "Management of Facility-Specific Backfitting and Information Collection," are with the NRC Commission for review and approval. Lower level agency guidance on backfitting has also been updated and will be made available for public comment after the Commission has provided direction on the Management Directive. In addition, the NRC has received training on the licensing basis and backfit, which is available publicly. Licensing basis and backfit training will become part of the NRC qualification program and refresher training for applicable agency positions following Commission approval of the updated agency backfit guidance. The agency TIA guidance is also being updated to improve the effectiveness and efficiency of that process which all agreed is a needed process to support determinations regarding the licensing basis. SECY-18-0060 also suggested risk-informing the 10 CFR 50.59 process. This update would involve rulemaking, which is a lengthy process. The NRC staff committed to looking at the existing regulations, to determine if short term updates could be made within the existing regulatory framework to better address low risk items or area of ambiguity in the licensing basis.

ROP Inspection

In the area of inspection, industry representatives and NRC staff exchanged dialogue in six NEI recommendations.

- Recommendation 1D, regarding reducing baseline inspection hours, NRC staff shared their views on performing minimal sampling for a column 1 plant for a certain period of time in the action matrix. This action could be potentially implemented and procedures changed in a short term period.
- Recommendations 1E and 2B.4, for removing or making Problem Identification and Resolution (PI&R) inspection reactive, NRC staff emphasized that PI&R team inspections result in some of the highest number of findings in the baseline inspection program. Also, PI&R team reviews licensee's corrective action program as a whole along with safety culture and other areas, which is not reviewed by individual inspections, also reviews CAP as indicated by industry. NRC staff shared the possibility of changing the frequency of PI&R inspection from biennial to triennial, which would be longer term project as it would likely require NRC Commission approval.
- Recommendation 1F, which recommends refraining from expanding baseline inspection effort in the future, NRC staff shared that language can be added to the inspection manual chapter to review existing baseline inspection for removal from the baseline program when adding new inspection effort as necessary. This effort might possibly be accomplished in a shorter term.
- Recommendations 2B.2 and 2B.3, involving the performance of IP 95001, NRC staff shared a self-assessment that has already been performed on IP 95001 and the staff has number of recommendations to improve IP 95001 implementation.

NRC staff asked clarifying questions regarding NEI's claim of increase in baseline inspections by 30% since the initiation of ROP. NRC staff did not align with industry and noted that increase

is closer to 10%, and that the majority of the increase is due to security inspections as a result of September 11, 2001.

Emergency Protection

NRC staff provided an update on the status of the emergency preparedness (EP) SDP Focused Self-Assessment (FSA) and the draft plan to incorporate any recommendations from the FSA into the ROP Enhancement Project. The NRC staff gave a general idea of the types of enhancements being discussed, however, the public was advised that the process has not been completed and any staff positions going forward have not been finalized. A public meeting will be held on January 10, 2019, to discuss the draft results of the FSA.

Radiation Protection

NRC staff conducted a public meeting with several representatives from the nuclear industry to discuss the radiation protection aspects of the ROP Enhancement effort. NRC staff provided a background of the ROP Enhancement effort; reviewed recommendations provided by industry for enhancing oversight in the radiation protection area and asked clarifying questions in regards to industry's recommendations (Recommendations 1A and 3A.1). The NRC agreed to host a public meeting in December 2018 to further discuss topics in this area. Specifically, NRC staff and industry representatives agreed that the enhancement effort will focus attention on oversight of specific radiation protection program areas: (1) ALARA, (2) Radiation Protection Instrumentation, (3) Effluents and (4) Self-Assessments. Industry agreed to lead discussions at the December meeting on each of the focus areas to provide insights into how and why oversight can be enhanced in each of these areas. As it pertains to self-assessments, industry agreed to provide insights into how self-assessments can be more effectively used in the oversight of radiation protection programs. NRC staff verified that industry's recommendations were well understood by the staff and that industry representatives recognize the notional timeframe for the ROP Enhancement effort.

Security

To address Recommendations 1C and 3A.1), NRC staff provided a summary of the status of actions to revise the security inspection program and the intent to expand the EP approach to the Security SDP. With respect to revising the security inspection program, NRC staff noted that all security baseline inspection procedures have been revised with exception of the Force on Force (FOF) inspection procedures. The revision will include several efficiencies and enhancements. NRC staff noted that the FOF inspection related procedures will be revised, once the staff receive direction from the Commission on SRM-SECY-17-0100, "Security Baseline Inspection Program Assessment Results and Recommendations for Program Efficiencies including the FOF Inspection Program". With regard to expanding the EP approach to Security SDP, NRC staff discussed the status of the Security SDP working group. This working group had previously coordinated with the industry and revised and issued Appendix E Part I the Baseline Security Significance Determination on September 17, 2018 (ML18164A326). IMC 0609, Appendix E, Part II FOF SDP revision has been placed on hold until NRC staff addresses SRM-SECY-17-0100.

IMC 0609 Appendix H

A draft version of a revision to IMC 0609, Appendix H, "Containment Integrity Significant Determination Process," was previously made publicly available in ADAMS (ML18285A030) for an external review. The NRC staff discussed provided time for industry feedback. One industry representative expressed that the added section of Consequential Steam Generator Tube Ruptures (C-SGTR) treated these events with too much conservatism, with regard to the probability of a large, early release given C-SGTR. Another comment was received regarding the treatment of hydrogen igniters in ice condenser plants which the industry felt was too conservative. The commenter recommended using plant-specific values (e.g., based on licensee PRAs). The NRC staff received those comments, and pointed out that Appendix H only provides an intermediate (Phase 2 risk assessment), and that any finding that does not screen to a Green significance level would receive a detailed risk evaluation that would factor in this type of information. Another industry participant indicated that they had provided comments to NEI, and would follow up with the relevant point-of-contact at NEI to find out if those comments would be provided to NRC. NRC staff plans to evaluate the feedback received, make any appropriate revisions to the document, and then issue the document.

Frequently Asked Questions

Frequently Asked Question (FAQ) 18-05 requests guidance interpretation for the unplanned power change performance indicator definition regarding an event that occurred at Turkey Point Unit 3 on November 20, 2017. A proposed NRC response to this FAQ was made publicly available on November 8, 2018 (ADAMS as Accession No. ML18312A217) and discussed during the meeting. The licensee provided feedback regarding the NRC's proposed response. The NRC staff will take into consideration the feedback received and provide an updated proposed NRC response to be discuss during the next ROP public meeting in January 2019.

Enclosure:
Attendance List

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PUBLIC MEETING HELD ON NOVEMBER 15, 2018**

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JWillis	ESchrader	

ADAMS ACCESSION NO:ML18348B256

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NAME	MAnderson	RGibbs
DATE	12/14/18	12/ 14 /18

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
November 15, 2018**

Mary Anderson	NRC	Jerry Bonanno	NEI
Greg Bowman	NRC	Greg Halnon	First Energy
Russell Gibbs	NRC	Greg Krueger	NEI
Mike King	NRC	Ron Gaston	Entergy
Marlone Davis	NRC	Scott Dixon	Exelon
C.J. Fong	NRC	David T. Gudger	Exelon
David Garmon	NRC	Faramarz Pournia	Southern Nuclear Company
Don Helton	NRC	Owen Scott	Southern Nuclear Company
Don Johnson	NRC	Roy Lithicum	Exelon
Doug Bollock	NRC	Ken Heffner	Certrec
Ken Kolaczyk	NRC	Marty Murphy	Xcel Energy
Rob Krsek	NRC		
Mike Montecalvo	NRC		
Alonzo Richardson	NRC		
Jeff Bream	NRC		
Jeremy Groom	NRC		
Antonios Zoulis	NRC		
Raymond Gibson	NRC		
Carleen Parker	NRC		
Eric Bowman	NRC		
Matthew Humberstone	NRC		
Doug Broaddus	NRC		
Ami Agrawal	NRC		
Joylynn Quinones	NRC		
Matt Leach	NRC		
Dan Merzke	NRC		