



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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May 2, 2019

MEMORANDUM TO: Dennis C. Morey, Chief
Licensing Processes Branch
Division of Licensing Projects
Office of Nuclear Reactor Regulation

FROM: Leslie Perkins, Project Manager */RA/*
Licensing Processes Branch
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Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MARCH 20, 2019, PUBLIC MEETING BETWEEN
THE U.S. NUCLEAR REGULATORY COMMISSION AND NUCLEAR
ENERGY INSTITUTE AND INDUSTRY REPRESENTATIVES TO
DISCUSS INDUSTRY'S PROPOSED GUIDANCE FOR ADDRESSING
OPEN PHASE CONDITION (NRC BULLETIN 2012-01)

On March 20, 2019, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of the Nuclear Energy Institute (NEI) and the nuclear power plant industry. The purpose of the meeting was for NRC staff to provide feedback to industry on their draft white paper entitled "Guidance for Assessing Open Phase Condition Implementation Using Risk Insights." In the draft white paper, NEI proposed a comparison of the change in risk between operating with automatic functions to isolate a power supply affected by an Open Phase Condition (OPC) versus reliance on operator manual action and how this comparison could provide a basis for not enabling the Open Phase Isolation System (OPIS) automatic trip function. NEI discussed during the meeting their plans to revise the OPC Voluntary Industry Initiative (VII) to allow, as an option, the use of the risk-informed option described in the draft white paper.

During the meeting the NRC staff discussed their comments and questions on the draft white paper. In response to the staffs' question on the benefit of removing the OPIS automatic trip function, NEI indicated that the open phase isolation system circuitry is very sensitive to electric plant transients resulting from circuit breaker switching, for example, thus potentially resulting in a spurious actuation that could lead to a loss of offsite power. The staff asked the licensees whether there were any spurious actuations identified after the trip functions were enabled for those plants who enabled the trip functions after completing the plant modifications. NEI stated that there were none identified and clarified that spurious actuations were identified only during the testing phase of the plant modifications. The staff also asked about the number of licensees that plan to implement the risk-informed option described in the white paper. NEI stated that most licensees are currently undecided, but they expect that most are interested in using this approach while a few plan to keep the automatic trip function. NEI agreed to be a conduit to collect data on implementation for NEI members, and plan to provide information to the staff by late summer 2019.

The staff questioned why the draft white paper did not include numbers for the increase in risk due to spurious actuations, single failures in the onsite power system, and potential failure of OPIS detection scheme. In response, the industry stated that the number is very site-dependent. In response to staff comments on the OPC operating events, NEI agreed to provide an explanation for why the events for South Texas Project and Oconee Nuclear Station were not included in the initiating event frequency calculation. NEI also provided an explanation of why only U.S. data was used in the calculation. NEI further indicated that they will clarify the difference between the upper and lower OPIS monitoring failure rates, clarify the initiating event frequency numbers on page 11 of the draft white paper, and revise the table on page 5 of the draft white paper to identify the plant configurations.

NEI provided their plans going forward which included: revising the draft white paper in the next two weeks to address, as appropriate, the NRC staff comments discussed during the meeting, revising the VII by the end of April 2019, and providing information on licensees' plans for implementation by late summer 2019.

The NRC staff plans to hold another public meeting with NEI to discuss the proposed revisions to the VII, and next steps toward bulletin closure. NRC staff and industry's slide presentations can be found in ADAMS at Accession Nos. ML190978A231 and ML19093B44, respectively.

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Enclosures:
As stated

Meeting Participants
NRC Slide Presentation
NEI Slide Presentation
Meeting Notice

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ADAMS Accession Nos.: ML19102A310 Mtg. Summary; ML19078A231 NRC Slide Presentation; ML19093B844 NEI Slide Presentation; ML19078A305, Mtg. Notice; ML19102A315 Package

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DATE	5/1/2019	5/2/2019	5/2/2019	5/2/2019

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Meeting Participants

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Donna Williams	NRC
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Billy Dickson	NRC
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