



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

July 16, 2019

MEMORANDUM TO: Anthony D. Masters, Chief
ROP Assessment and Human Factors Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Tekia V. Govan, Project Manager */RA/*
ROP Support and Generic Communication Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY
PUBLIC MEETING HELD ON JUNE 19, 2019

On June 19, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with the Nuclear Energy Institute's (NEI's) Reactor Oversight Process (ROP) Task Force executives, and other senior industry executives, to discuss the staff's progress on the ROP enhancement initiative and other ROP topics. As a part of the opening remarks, NRC management provided the update that the Commission (SECY) paper outlining proposed changes to the ROP has been approved by the NRC's Office of Nuclear Reactor Regulation and will be provided to the NRC Commission by the end of June 2019, as scheduled.

Updates on the ROP Self-Assessment Program

The NRC staff provided the results of the calendar year (CY) 2018 ROP self-assessment, as well as the staff's plans for the CY 2019 ROP self-assessment. For the CY 2018 ROP self-assessment, the staff noted that the results indicate that the ROP met the NRC's strategic goals of ensuring safety and security through objective, risk-informed, understandable, and predictable oversight. For the CY 2019 ROP self-assessment, the staff noted that it would be limited in scope to the following elements: metrics, ROP program area evaluations, and an effectiveness review of recent changes to the cross-cutting issues program. The staff also provided a brief overview of the ROP self-assessment holistic review, which aims to refresh the ROP performance metrics, streamline the program, and better leverage program execution data in self-assessment reviews and assessment activities. Additional information regarding the CY 2018 results, the plan for CY 2019, and the staff's holistic review of the ROP self-assessment program is available in SECY-19-0037, "Reactor Oversight Process Self-Assessment for Calendar Year 2018," dated April 12, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19042A100).

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The staff answered questions from industry regarding the scope of the ROP self-assessment holistic review, public engagement in the inspecting finding resolution management effectiveness review process, inspection finding trends, and the ROP feedback process. The staff received positive feedback from industry regarding the opportunities for public engagement and the systematic approach of the emergency preparedness significance determination process focused assessment, which was conducted by the Office of Nuclear Security and Incident Response (NSIR) in CY 2018.

Reactor Oversight Process Performance Indicator Program Frequently Asked Question (FAQ)

The NRC staff discussed the proposed NRC response for FAQ 19-02, Brunswick reactor coolant system (RCS) leakage (ADAMS Accession No. ML19169A263). The licensee presented this FAQ during the May 22, 2019 ROP public meeting. In the FAQ, the licensee requested a plant specific exemption from the NEI guidance to report relevant RCS leakage for an event that occurred at Brunswick on March 28, 2019. The basis of their request is that the intent of the RCS leakage performance indicator (PI) is to monitor RCS leakage below technical specification to ensure licensees identify and trend leakage and take timely corrective actions well before the technical specification limit is reached. The licensee also stated that because they already replaced all susceptible couplings, this event should be evaluated under other NRC processes and that plant specific circumstances should be considered to exempt recording the leakage from the event.

The NRC staff reviewed the guidance and determined that this event meets the definition and objective of the RCS leakage PI. The NRC staff could not find any exemption in the current guidance that would apply for this event. In conclusion, the NRC staff determined that the March 28, 2019 Brunswick RCS leakage event should count for the first quarter 2019 PI data and that the exemption requested for this event is not approved.

The status of FAQ 19-01, "Change to NEI 99-02 Text for the Drill/Exercise Performance Indicator – Initial Notification Form Accuracy Criteria," was transitioned to final approval during the May 22, 2019 ROP public meeting. The new ADAMS Accession No. for FAQ 19-01 is ML19169A262.

ROP Enhancement Updates

ROP Enhancements Recommendation Memo

The NRC staff discussed the near-term issuance of the ROP enhancement recommendations memo. The memo, which will be publicly available, will disposition the 27 recommendations made by NEI (ADAMS Accession No. ML18262A322) and the 72 recommendations made by NRC staff and other stakeholders as part of the NRC's transformation team efforts (ADAMS Accession No. ML18292A594). Many of the transformation recommendations are not within the scope of ROP enhancement but will, if accepted for further action, be dispositioned by other NRC initiatives. There are several recommendations that are within the scope of ROP enhancement but are not being considered for additional NRC action – mainly because the NRC staff and other stakeholders have concluded that the ROP with its goals, objectives and oversight framework are sound. Recommendations that are within the scope of ROP enhancement that necessitate additional NRC action are being addressed under ROP

Enhancement Phase 2 (e.g., comprehensive review of the problem identification inspections, effectiveness review of the Cross-Cutting Issues Program).

Independent Spent Fuel Storage Installation Inspection

The NRC staff provided an update that the Division of Spent Fuel Management in the Office of Nuclear Material Safety and Safeguards (NMSS) created a team to assess the current independent spent fuel storage installation inspection program and propose recommended changes to the program, if necessary. The staff explained that the team has members from all four regions, NRR and NMSS and a Champion from NRC's Region IV office. During the meeting NEI mentioned its desire to have a copy of the team's working guidance (charter). The staff stated that currently, the working guidance document is non-publicly available. However, the staff plans to provide a copy to NEI and is working to make the document publicly available.

Radiation Protection

The NRC staff provided a status on the update the Inspection Procedures (IP) used to inspect performance in the Radiation Safety Cornerstones of the ROP, IP 71124. The staff is considering methods to risk inform the effluent and environmental radiation procedures, adding guidance to address inspection planning and addressing various administrative issues during this update. Additionally, the staff is developing a framework for providing oversight of Title 10 of the *Code of Federal Regulations*, Part 37 for performance at power reactors. The staff described these efforts with external stakeholders during a public meeting on May 30, 2019. The staff will continue discussion on this topic at the upcoming public meeting on July 31, 2019 and expects to complete the final drafts of the IP in the fall of 2020.

Emergency Preparedness

The NRC staff provided an update on the Emergency Preparedness (EP) portion of the upcoming SECY, as well as consideration(s) for a future SECY. The staff also provided an update on what action(s) may be considered for the ROP enhancement project and what action(s) may be prioritized/evaluated by NSIR but may not be part of the ROP enhancement project. However, topics not included in the ROP enhancement project may still be an NSIR priority for enhancing the overall EP inspection program (i.e., training, IPs, etc.). The staff appreciated the positive comments related to the effectiveness of the EP significance determination process focused self-assessment and its recommended use for other programs to use as a model.

Assessment and Mitigating Systems Performance Index Area

The NRC staff briefly discussed plans for conducting an effectiveness review of the ROP cross-cutting issues program as part of the ROP self-assessment process governed by Inspection Manual Chapter (IMC) 0307 and in response to several ROP enhancement recommendations that suggest review of or changes to the use of cross-cutting issues. The review will be conducted by a multi-disciplinary team of five individuals from both headquarters and the regional offices and will be led by the ROP Assessment and Human Factors Branch in the Division of Inspection and Regional Support. The staff also confirmed that ROP enhancement recommendations in the PIs area remain open. Industry is in the process of developing a proposal to replace the mitigating systems performance index PIs, which will be discussed in detail at future ROP public meetings. In addition, the EP focused self-assessment

has recommended changes to the EP PIs. Recommended changes will be pursued through the process outlined in IMC 0608 for making significant changes to the PI program. The staff has not currently identified additional changes to PIs.

Significance Determination Process

The NRC staff briefed that they are currently conducting an evaluation of the interactions with the Inspection Finding Review Board to determine if guidance enhancements for interactions between licensees and the NRC are necessary. The staff also discussed the effort to work with industry and other interested parties to improve assessment tools and processes. Specifically, a pilot that provides an option for licensees to provide justification for unique common cause failure defense strategies began in April 2019 and will continue for a period of one year. The effort to finalize the human reliability analysis tool to better appropriately assess human error probabilities is ongoing with a publicly-available report expected by the end of the fiscal year. Finally, the staff discussed internal efforts to increase the familiarity and use of simplified plant analysis risk models and the associated plant reliability information books by inspectors for inspection planning and initial screening of issues.

Reactor Oversight Process Inspection

The NRC staff briefed that a review team is being formed for this area and the team will commence their review soon. The staff will provide additional updates at the next ROP public meeting, scheduled for July 31, 2019.

Security

The staff informed industry that there were no current updates for this topic. However, the staff will continue to discuss future activities during regular ROP monthly meetings.

Conclusion

At the end of the meeting, NRC and industry management gave closing remarks. NEI expressed appreciation for the open dialogue and willingness of NRC staff to hear industry views, even in areas where NRC staff and industry may not be aligned. The NRC management stressed the importance of NRC being focused on providing reasonable assurance of public health and safety when considering changes to the ROP.

The enclosure provides the attendance list for this meeting.

Enclosure:
As stated

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING ON JUNE 19, 2019 DATED

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ADAMS Accession No.: ML19193A139

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|---------------|-------------------|--------------------|-------------------|
| OFFICE | NRR/DIRS/IRGB/PM* | NRR/DIRS/IRGB/OLA* | NRR/DIRS/IRAB/BC* |
| NAME | TGovan | IBetts | AMasters |
| DATE | 07/12/2019 | 07/16/2019 | 07/16/2019 |

OFFICIAL RECORD COPY

LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING

June 19, 2019, 10:00 AM to 11:45 AM

**NRC One White Flint North
11555 Rockville Pike
O-11B04
Rockville, MD**

| Name | Organization | Name | Organization |
|----------------|---------------------|------------------|---------------------|
| Carlos Sisco | Winston and Strawn | Annie Mayer | NRC |
| Lee Grzeck | Duke Energy | Billy Dickson | NRC |
| Jim Slider | NEI | Eric Bowman | NRC |
| Bryan Wooten | Duke Energy | Tara Inverso | NRC |
| Larry Parker | STARS Alliance | Alex Garmoe | NRC |
| Jerry Pierce | Duke Energy | Russ Gibbs | NRC |
| Marty Murphy | Xcel Energy | Doug Bollock | NRC |
| Danny McGinnis | Dominion Energy | Ami Agrawal | NRC |
| Mandy Halter | Entergy | Tekia Govan | NRC |
| Steve Catron | NextEra | Joylynn Quinones | NRC |
| Ken Heffner | Certrec | Mike Montecalvo | NRC |
| Chris Nolan | Duke Energy | Don Johnson | NRC |
| Jeff Sowa | TVA | Carla Roque-Cruz | NRC |
| Rob Burg | EPM, Inc. | Dan Merzke | NRC |
| Art Zaremba | Duke Energy | Ken Kolaczyk | NRC |
| Jana Bergman | Curtiss Wright | David Garmon | NRC |
| Deann Raleigh | Curtiss Wright | Shakur Walker | NRC |
| Steven Dolley | Certrec | Jimi Yerokun | NRC |
| Chris Earls | NEI | Robert Murray | NRC |
| Tom Boso | NEI | Robert Kahler | NRC |
| Justin Warren | NEI | Robert Krsek | NRC |
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