

July 17, 2019

Douglas E. True, Senior Vice President and Chief Nuclear Officer
Nuclear Energy Institute
1201 F Street, NW, Suite 1100
Washington, DC 20004

SUBJECT: ACKNOWLEDGEMENT OF RECEIPT OF INDUSTRY INITIATIVE ON OPEN
PHASE CONDITION, REVISION 3

Dear Mr. True:

This letter is to acknowledge receipt of your letter dated June 6, 2019, (Agencywide Documents Access and Management System (ADAMS) Accession Number ML19163A176) regarding the submittal of Revision 3 of the Nuclear Energy Institute (NEI) Open Phase Condition (OPC) Initiative to resolve OPC issue described in NRC Bulletin 2012-01 (BL 2012-01), "Design Vulnerability in Electric Power System."

In your letter, you stated that Revision 3 to the NEI OPC initiative incorporates an option for plants to perform a risk evaluation to support manual response to an OPC as an alternative to enabling automatic isolation. The initiative revision and drafts of the risk-informed guidance were discussed with NRC staff in three public meetings held on February 20, 2019, March 20, 2019, and May 7, 2019. The letter further indicates that the industry's chief nuclear officers have voted to approve this revision to the NEI OPCs initiative and that the initiative is a formal commitment by NEI member companies that operate nuclear power plants to follow a specific policy or plan of action.

The staff received a copy of the risk guidance document for implementing the risk option, NEI 19-02, "Guidance for Assessing Open Phase Condition Implementation Using Risk Insights," from your staff on June 20, 2019 (ADAMS Accession No. ML19172A086). In addition, on June 28, 2019, your staff informed the NRC staff that Exelon Corporation has identified Nine Mile Point Unit 2 and Ginna Station as the two plants for pilot implementation of the risk option. Currently, NRC staff is preparing a plan to audit the implementation of the risk option at the two pilot sites. This audit plan was discussed with you at a public meeting on July 16, 2019.

The NRC appreciates the industry's attention and commitment to support the resolution of the open phase issue. The information provided by your staff, as well as the discussion from the public meetings will be useful in resolving the issue and closing the bulletin in a timely fashion. I would encourage that any changes or updates to industry plans be communicated to the NRC as soon as possible so that we may factor them into our decision-making process.

Should you or your staff have any questions, please contact Donna Williams at 301-415-1322.

Sincerely,

/RA/

Eric J. Benner, Director
Division of Engineering
Office of Nuclear Reactor Regulation

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