



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

July 25, 2019

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

FROM: Joseph A. Golla, Project Manager */RA/*  
Licensing Processes Branch  
Division of Licensing Projects  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING WITH THE BOILING WATER  
REACTOR OWNER'S GROUP EXECUTIVE OVERSIGHT  
COMMITTEE

On July 17, 2019, management of the U.S. Nuclear Regulatory Commission (NRC), Office of Nuclear Reactor Regulation (NRR) met with representatives of the Boiling Water Reactor (BWR) Owner's Group (BWROG) Executive Oversight Committee in a public meeting at NRC headquarters. The purpose of the meeting was for NRC and BWROG managers to discuss current BWR issues of interest at a high level. At the meeting both NRC staff and the BWROG made presentations. Presentation slides used at the meeting can be viewed at NRC Agencywide Documents Access and Management System Accession No. ML19197A269.

The BWROG presented the following topics:

- BWROG Introduction
  - Meeting Objectives
  - BWROG Overview & Mission, Structure, Leadership, Membership
  - BWROG Committees
- Target Rock 2-Stage SRV Update
  - Setpoint Drift
  - SRV Committee Update
  - 2019 In-Process Activities and Future Potential Activities
  - Traveler to Revise the Safety/Relief Valve Requirements in TS 3.4.3
- Licensing Committee Update
  - Follow-on Traveler for TSTF-542, "Reactor Pressure Vessel Water Inventory Control"
  - Traveler to Revise the Tech Spec Pressure Boundary Leakage Requirements
  - TSTF-541, Rev. 2, "Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position"
  - TSTF-568, Rev. 2, "Revise Applicability of BWR/4 TS 3.6.2.5 and TS 3.6.3.2"

- Emergency Procedures Update Committee
  - Fleet Implementation Schedule
  - EPG/SAG Rev. 4 Implementation Activities
- Integrated Risk-Informed Regulation Committee Update – Recent Successes
  - New Methods and Use of Peer Reviews for Adoption in PRA
  - Agreement on Update versus Upgrade Definitions and Treatment
  - Facts and Observations Closure
  - Use of FLEX<sup>1</sup> Portable Equipment as a Component of Risk Mitigation
- Anchor Darling Double Disc Gate Valve Wedge Pin Failures
  - Double Disc Gate Valve Part 21
  - Initial Industry Survey
  - BWROG Guidance Document Revision
  - Follow-up Survey

The staff presented the following topics:

- Alternate Approach for Treatment of Seismic Risk In 50.69 Categorization
- Credit for Operator Actions in FLEX
- License Amendment Request (LAR) Acceptance Reviews – Communication of Estimated Review Hours (no slides were used for this topic)
- Digital Instrumentation & Control Upgrades (no slides were used for this topic)

#### LAR Acceptance Reviews

Regarding LAR Acceptance Reviews, BWROG had a concern regarding the consistency of the communication of review hours in Acceptance Review letters. In a recent phone call with staff, BWROG cited the Hatch 10 CFR 50.69 acceptance letter as the primary example of their concern. BWROG's concern was that the Hatch 50.69 acceptance letter included a much larger number of review hours than the typical 50.69 review. When the licensee inquired with the NRC, they found out that the estimated hours were atypically high because it included an estimate of the contractor hours whereas most other acceptance letters in the past did not include contractor hour estimates. The BWROG is concerned about consistency in the information provided in acceptance letters.

The BWROG Executive Oversight Committee is looking to find out if and how contractor support information is going to be conveyed in future acceptance letters and how consistency is going to be achieved.

Mr. Craig Erlanger, Director, Division of Operating Reactor Licensing, explained the following at the meeting regarding this topic: The NRC wants to increase transparency. The NRC staff is currently evaluating the best method for communicating the usage of contract support to licensees. Because the amount of contract dollars or even the need to utilize contract support is often not known at the completion of the acceptance review, an hour or dollar amount for contract support typically cannot be included in the acceptance review notification. NRC is

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<sup>1</sup> FLEX is not an acronym, but refers to the industry's response to Order EA-12-049, which it has named "Diverse and Flexible Coping Strategies (FLEX)"

considering means to effectively increase the awareness of the assigned plant Project Manager when the need for a contract on a licensing action is identified at or following the acceptance review. The NRC is considering enhancements in communications through the plant Project Manager to the licensee when contract support is needed and, to the extent practical, the contract value and any resulting change in the staff level-of-effort.

#### Digital Instrumentation and Control Upgrades

Mr. Eric Benner, Director, Division of Engineering, conveyed the following aspects of the NRC's ongoing effort to modernize the instrumentation and controls regulatory infrastructure:

The staff, in coordination with stakeholders, is updating key topics including Protection Against Common Cause Failure, Digital I&C Upgrades and Replacements under Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.59, Commercial Grade Dedication of Off-the-Shelf Digital Equipment for Safety Related Applications, and Licensing Process Improvements that should have the greatest tactical impact, in the near-term, in addressing regulatory challenges and improving timeliness, efficiency, and effectiveness.

The longer-term goal is to evaluate and strategically implement the follow-on steps for continued improvement of the NRC's digital I&C regulatory infrastructure. It is the intent of the NRC that the infrastructure improvements result in a state in which the nuclear power industry can perform digital upgrades under the 10 CFR 50.59 licensing process or, where necessary, obtain regulatory approval to use digital technology that provides for adequate safety and security through processes that are efficient, minimize uncertainty, and can be consistently applied across different technologies.

In December 2018 the staff issued Revision 2 to DI&C ISG-06 "Licensing Process" to provide an alternate licensing review process. The alternate review process provides for NRC approval much earlier in the design process, eliminates licensing review of detailed software development results and factory acceptance testing, focuses review on design architecture, software requirements, development plans, and vendor oversight plan. NEI is updating industry licensing guidance (NEI 06-02) to assist utilities in crafting digital I&C license amendment requests based on ISG-06.

Also, staff is developing a new approach for addressing diversity and defense-in-depth in BTP 7-19, "Guidance for Evaluation of Diversity and Defense-In-Depth in Digital Computer-Based Instrumentation and Control Systems."

An agreement reached at the meeting was:

BWROG and NRC staff agreed to conduct a workshop to facilitate NRC understanding of BWROG Emergency Procedures Guideline/Severe Accident Guideline (EPG/SAG) Rev. 4 and share potential lessons learned from plant-specific implementation.

No comments or questions were received by members of the public.

Enclosure:  
Attendees List

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OWNER'S GROUP EXECUTIVE OVERSIGHT COMMITTEE  
DATE: JULY 25, 2019

**DISTRIBUTION:**

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**ADAMS Accession Nos.: ML19205A020 Mtg. Summary; ML19197A269 Slides NRC-001**

OFFICE	NRR/DLP/PLPB/PM	NRR/DLP/PLPB/BC	NRR/DLP/PLPB/PM
NAME	JGolla	DMorey	JGolla
DATE	7/24/2019	7/25/2019	7/25/2019

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**U.S. Nuclear Regulatory Commission Public Meeting Attendance**

**BWROG Executive Oversight Committee**

**July 17, 2019**

John Grubb	Xcel Energy
Glen Watford	GE Hitachi
Paul Davison	PSEG
Tim Hanley	Exelon
Robert Rishel	Duke Energy
Craig Shepherd	Fermi 2
Steve Douglas	TVA
Gregory Holmes	GE Hitachi
Ryan Joyce	SNC
Greg Krueger	NEI
Robert Brightup	Exelon
Lucas Martins	GE Hitachi
Stephen Geier*	NEI
Jana Bergman	Curtiss Wright
Russ Haskell	NRC/NRR/DORL
John Hughey	NRC/NRR/DRA
Ching Ng	NRC/NRR/DRA
Stacey Rosenberg	NRC/DRA/APLA
Chris Cauffman*	NRC/DIRS/IRIB
Eric Benner	NRC/NRR
Mike Franovich	NRC/NRR/DRA
Mirela Gavrilas	NRC/NRR/DSS
Jane Marshall	NRC/NRR/DSS
Jim Hickey	NRC/NRR/DSS
Mark King	NRC/NRR/DIRS
Margaret O'Banion	NRC/NRR/DORL
Ravi Grover	NRC/NRR/DSS
Antonios Zoulis	NRC/NRR/DRA
Ross Telson	NRC/NRR/DIRS
Dennis Morey	NRC/NRR/DLP
Mehdi Reisi-Fard	NRC/NRR/DRA
Stewart Bailey	NRC/NRR/DE
Balwant Singal	NRC/NRR/DORL
Ngola Otto	NRC/NRR/DLP
Joe Golla	NRC/NRR/DLP

\*Participated via telephone

Enclosure