



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
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December 5, 2019

MEMORANDUM TO: Nancy L. Salgado, Chief
Plant Licensing Branch III
Division of Operator Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Booma Venkataraman, Project Manager */RA/*
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF NOVEMBER 7, 2019, MEETING WITH NUCLEAR
ENERGY INSTITUTE AND INDUSTRY REGARDING TASK
INTERFACE AGREEMENT PROGRAM REVITALIZATION WITH
TABLE-TOPS (EPID L-2019-PMP-0002)

On November 7, 2019, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Nuclear Energy Institute (NEI) and industry (collectively, "industry") at NRC Headquarters, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to provide a forum in table-top format with examples to discuss the NRC staff's proposed draft revitalization of the Task Interface Agreement (TIA) in NRR office instruction COM-106. The meeting notice and agenda, dated October 23, 2019, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML19309D349. A list of attendees is enclosed. No regulatory decisions were made during the meeting.

TIA Revitalization Discussion with NRC Internal Table-Top Examples

The NRC staff presented an update on the progress of the ongoing TIA Program Revitalization project, and provided descriptions of the criteria, action steps, flow-charts, tools and templates associated with the proposed process, to be rebranded as Technical Assistance Request (TAR). The discussion also included details on the safety significance determination tool and table-top examples that staff used internally to test the proposed process. The staff's presentations can be found at ADAMS Accession Nos. ML19298A118, ML19298A119, ML19308B398. The NRC staff discussed the following key aspects of the project:

Proposed Process

- The NRC staff highlighted how the industry recommendations received on March 19, 2019 (ADAMS Accession Nos. ML19077A297 and ML19074A141), were being addressed in the proposed TAR process. The staff indicated that since the TAR process does not take an agency action or make a decision (i.e., only serves to inform decisionmaking in other processes), there is no action or decision to appeal. Licensees already have opportunities to appeal or challenge NRC actions in other processes, such as enforcement, backfit, and orders. The industry had requested eliminating

consideration of pre-decisional information in the revised process. The NRC staff indicated it will make the information public whenever possible and the ability to release information is issue-specific and dependent on the process TAR will serve.

- The NRC staff described the enhanced opportunities for licensee engagement in each of the three steps (intake, screening and evaluation, and in-depth review) of the proposed TAR process. In describing the proposed process, the staff discussed the following:
 - the gathering of facts as early as possible with the mechanics of the intake form
 - the licensee notifications in the process
 - sharing of the issue and opportunities for providing new information in the screening and evaluation phase
 - licensee engagement and sharing of facts underlying the issue and the unresolved questions at the kick-off of the in-depth review phase
- The industry provided a comment for licensee engagement after the integrated team has framed and scoped the issue for the licensee to provide information as needed. The NRC staff agreed to consider this proposal.
- The industry requested an opportunity for NRC staff to share the draft TAR response with the licensee in the in-depth review phase. The NRC staff agreed to consider this proposal.
- The industry representatives noted that the staff's proposed process appeared to be responsive to the challenges experienced in past TIAs.

Safety Significance Determination Considerations

In the aforementioned NRC presentation slides, the staff discussed the safety significance determination approach that is being adopted for the revised TAR process. The staff described the steps in this process, which mirror the agency's standard approach to integrated decisionmaking while also leveraging specific regulatory guidance within each of these steps. Members of industry asked a number of clarifying questions about how individual steps would be assessed, as well as how the piece-wise information would be integrated in making the overall determination of safety significance.

Table-Top illustration

- The NRC staff presented a hypothetical table-top example to illustrate and discuss the functionality of the proposed process. The hypothetical example featured a plant licensing basis question regarding operation of the residual heat removal system in suppression pool cooling mode and the potential for water hammer-induced component failures during a postulated design basis event.
- The NRC staff applied this example to illustrate the TAR intake process, and the TAR screening and evaluation process. The staff also described the application of the criteria to enter the TAR in-depth review phase and the value of the licensee engagement in each of these TAR process steps.

- The NRC staff example was provided to demonstrate how the proposed graded approach applied integrated teams to provide timely recommendations to route the issue appropriately, and how the revised process can enhance collaboration with the requesting office and boost engagement with external stakeholders (e.g., licensee).
- Members of the industry asked several clarifying questions of the NRC staff and indicated that this example helped provide them with a better understanding of the staff's proposed process.

Discussion on Future Engagement with Industry

The NRC staff indicated that it will communicate with the industry on the nature of appropriate future engagement on the proposed process as the project progresses. The NRC staff also indicated it will follow-up with the industry's request regarding making the draft guidance available.

Further to the follow-up, the staff provides the following information:

While the staff noted in the previous public engagements that internal NRC procedures are not typically published for comment, the staff does acknowledge that the major overhaul of the TIA process is particularly intricate, and unique in regard to its need for efficient coordination with external stakeholders during designated points in the revised process. For these reasons, the NRC staff is sharing a draft version of COM-106 publicly for general awareness (ADAMS Accession No. ML19338E029). This draft should help external stakeholders gain further understanding on the details, action steps, and discussions presented in the November 7, 2019 meeting, and specifically offer clarity with respect to the enhanced external stakeholder engagement in the revised process. No comments or feedback are sought at this time on this version of the draft COM-106 guidance.

The NRC staff is currently engaging internal stakeholders to provide feedback on the draft and the TIA revitalization project is expected to progress through an internal formal comment period in the January- February 2020 time frame. Following this, the NRC staff expects to engage external stakeholders and share a further-refined draft approximately two weeks in advance of a public meeting in the March timeframe, during which the staff will facilitate discussion focused on the portions of the draft that directly involve interactions with external stakeholders.

There were no members of the public in attendance. Public Meeting Feedback forms were not received.

Please direct any inquiries to me at 301-415-2934 or Booma.Venkataraman@nrc.gov.

Enclosure:
List of Attendees

LIST OF ATTENDEES

NOVEMBER 7, 2019, MEETING WITH NEI AND INDUSTRY

MEETING WITH NUCLEAR ENERGY INSTITUTE AND INDUSTRY REGARDING TASK

INTERFACE AGREEMENT PROGRAM REVITALIZATION WITH TABLE-TOPS

NRC Participants

Craig Erlanger
Jamie Heisserer
Tim Reed
Carleen Parker
Sam Lee
Booma Venkataraman
Don Helton
Mel Holmberg
Matt McConnell
Phil Mckenna
Kayla Gamin
Ray Kellar
Jim Hickey*
Robert Krsek*

Industry Participants

Andrew Mauer (NEI)
Tim Riti (NEI)
Greg Krueger (NEI)
Marty Murphy (Xcel Energy)
Lee Grzeck (Duke Energy)
David Gullott (Exelon)
Stephenie Pyle (Entergy)
Steve Catron (NextEra Energy)
Mike O'Keefe (Certrec Corporation)
Deann Raleigh (Curtiss Wright Corporation)

Members of the Public

None

*- Participated by telephone

Enclosure

SUBJECT: SUMMARY OF NOVEMBER 7, 2019, MEETING WITH NUCLEAR ENERGY
INSTITUTE AND INDUSTRY REGARDING TASK INTERFACE AGREEMENT
PROGRAM REVITALIZATION WITH TABLE-TOPS (EPID L-2019-PMP-0002)
DATED DECEMBER 5, 2019

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ADAMS Accession No.: ML19329B485

*via e-mail

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