

(revised)

MEETING MINUTES

PURPOSE: Discuss implementation of Sub-agreement 2 between NRC and IDNS on joint ASME inspections. Discuss the IDNS proposed Boiler and Pressure Vessel Safety Rules.

MEETING ATTENDEES: NRC: Hub Miller, John Jacobson, Duane Danielson, Mark Ring, Kevin Ward

IDNS: Roy Wight, Mike Parker, Neill Howey, Larry Sage, Jim Blackburn, Frank Niziolek*, Steve England*, Brent Metrow*, Lyle Black*, Betsy Salus*

(* indicates part-time participation)

LOCATION: IDNS Offices, Springfield, Illinois

DATE: September 7, 1990

FOLLOW-UP ACTION:

SUBMITTED BY: Lawrence Sage *LS*

REPORT DATE: September 21, 1990
(revised October 12, 1990)

The meeting started at 10:30 a.m. in REAC. Roy Wight opened with an overview of the mission of IDNS and the Office of Nuclear Facility Safety. He also described IDNS's organization and stated that IDNS wants to move into the area of preventative safety. The ASME Code program, along with the Resident Engineer and Reactor Safety programs, is a cornerstone of this effort.

Next, Mike Parker described the IDNS remote monitoring system and the role of the Reactor Analyst in emergency preparedness. Jim Blackburn gave a similar presentation on the role of the Environmental Analyst. Roy then described the role of the REAC Commander.

Hub Miller described the evolution of the scope of inspections. NRC is interested not only in "safety-related" areas; inspections also focus more broadly on areas deemed "important to safety", particularly when warranted by performance problems or events. The term "important to safety" includes the entire range of FSAR structures, systems and components, Miller added that although legally 10 CFR 50 Appendix B QA requirements apply only to safety-related areas, areas that are important-to-safety are sometimes scrutinized during inspections, albeit less frequently.

Miller discussed the concerns that the NRC had about the scope of IDNS's activities, both under the MOU and under state law. NRC is reviewing its

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in accordance with the Freedom of Information
Act, 5 U.S.C. 552

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position, but one interpretation of the MOU is that it makes provision for IDNS participation only in the area covered by ASME Code Sections III and XI (safety-related systems). By not formally giving IDNS a role in the inspection of important-to-safety systems, it has been interpreted that IDNS is precluded from any involvement.

IDNS personnel did not agree with this interpretation. IDNS is required by state law to assure the safety of the people of Illinois in relation to all boilers and pressure vessels. Even though IDNS may not participate with the NRC in their activities in other than safety-related systems, IDNS has an independent interest and authority. Miller said it seemed inconsistent to permit IDNS to be involved in "safety-related" inspections and not in those in the "non-safety-related" areas where NRC places less inspection emphasis. As he stated in the previous meeting on Subagreement 2, consideration will be given by NRC to broadening the agreement to apply to non-safety-related FSAR inspections. It was emphasized by IDNS that in all states having a boiler law, the responsible agency is currently exercising similar jurisdiction to that which IDNS wishes to do. This includes the Office of the State Fire Marshal in Illinois.

Miller stated that the NRC views Illinois and IDNS as being more advanced and knowledgeable than the other states. The NRC does not want to be inconsistent in dealing with states, taking a harder line with IDNS than it does with other states.

Miller requested that IDNS channel any information to be sent to NRC headquarters through Bert Davis, Region III Administrator. He expressed that Davis be the main contact for state affairs in his region. He subsequently clarified in a telephone conversation with Roy Wight that this applied to inspections and not to licensing issues.

Kavin Ward described a typical inspection from planning to report writing. Non-site preparatory activities include procedure and personnel qualification review, confirming important dates, etc. He indicated that to conduct an inspection, Ward typically spent about one to two weeks at the site over a six to eight week period. He generally arrives at the time of the first inspection, returning later in the middle of the outage to witness critical NDE examinations, and then returning toward the end to observe additional UT of Class 1 and 2 components. During these site visits, Ward also evaluates inspectors. Modifications are reviewed and evaluated during these ISI inspections during periods of ISI inactivity. A report is issued only after all inspections are complete.

Ward provided four procedures that fully describe the inspections conducted and a number of supporting procedures. Ward and Jerry Shapker are the two senior region inspectors who will likely lead IDNS inspectors in safety inspections. Miller indicated that IDNS may also wish to become involved with the more non-routine aspects of ISI activities (e.g. QC2 reactor head cracks). Roy agreed with this, but pointed to the current manpower limitation as the driving force behind any decision in this area.

IDNS provided Miller with a copy of the OSFM Rules and the Boiler and Pressure Vessel Safety Act (the Act). Miller requested a copy of the Nuclear Safety Preparedness Act. IDNS pointed out the difference in legal bases for reactor safety programs such as RDL and license amendment reviews and those for the Code

Compliance Program and activity related to boiler and pressure vessel safety. The limitations of the Act in regard to boilers and pressure vessels and appurtenances to these items were described.

Mark Ring questioned where IDNS saw the program five or ten years from now. Roy responded that that depended on the results and successes of the program as it moves forward.

Ward provided copies of the Region III outage schedule for planning purposes. The QC1 outage, originally scheduled for September 1990, is now scheduled for November 1990. The BD1 outage, originally scheduled for January, is now scheduled for mid-March 1991. The Braidwood inspection is a large scale effort. Larry Sage said that we were currently planning to participate as observer in the QC1 inspection and as fully qualified inspection team members for the BD1 inspection.

Miller said that it was very important to make progress and that it would be a positive influence on NRC decisions if we achieve successes under the MOU in joint safety inspections. The NRC and IDNS should concentrate in inspections which are clearly within the current scope of the MOU focusing principally on traditional ASME inservice inspection (ISI) activities. Miller added that some successes in ISI inspections might dispel NRC upper management fears about IDNS Rules if they are otherwise consistent with the ASME Code system.

Miller had no official comments on our Rules. Miller reiterated what was said at the Glen Ellyn meeting in July. These included the question of how the Rules were supposed to relate to safety inspections and the preemptive nature of IDNS' Inspection Certificates. He stated that the rules looked like those which NRC (in letter from Office of General Counsel to IDNS of June 24, 1986) previously raised concerns about on potential preemption grounds. IDNS stated the rules are essentially the same as those which have already been in place and which have applied to nuclear plants as well as other facilities with pressure vessels. These are the regulations of the State Fire Marshal which are similar to what is in effect in other states. Miller stated this would be taken into account in the NRC's internal deliberations described above.

Miller asked about the status of the OSFM Board meeting concerning IDNS Rules. Neill Howey responded that the Board had no specific questions about the Rules.

cc: Director Ortziger
Gordon Appel
Roy Wight
Mike Parker
Neill Howey
Jim Blackburn
Frank Niziolek
Steve England
Brent Mecrow
Lyle Black
Betsy ~~Black~~
H. J. ~~Miller~~, USNRC RIII

INSERVICE INSPECTION

1. PROGRAM 73051

- a. Reviewed By ANII, Licensee, QC/QA, etc.
- b. Sufficient Organizational Staff
- c. Audits/Surveillance
- d. Review Relief Requests

2. PROCEDURES 73052

- a. Reviewed By ANII, Licensee, QC/QA, etc.
- b. Review All Procedures That Are Used --
- c. Certification Of Material & Equipment, PT, UT, etc.

3. OBSERVATION OF WORK 73753

- a. GL-88-01, NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping. NRC Position on 13 Items, Water Chemistry, Weld Overlay Reinforcement, Sample Expansion, etc. Out 1/25/88, Response, 180 After Receive. (Replace Susceptible Piping with IGSCC Resistant Materials 316L, 308L, 309L).
- b. Observe Every Method if Possible -- 3 (Not All)
- c. Certifications of Personnel, All On Site --
- d. ANII Involved?

4. DATE REVIEW 73755

- a. Observe All Repair and Some Other --
- b. Visit Site Just When Exams Start, Mid and Last of ISI

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NOT ADMITTED IN D.C.

October 26, 1990

Mr. Donnie H. Grimsley
Director, Division of Freedom of
Information and Publications Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: FOIA Request

Dear Mr. Grimsley:

Pursuant to the Freedom of Information Act and the NRC's regulations, I hereby request any and all documents related to a meeting between Mr. H. J. Miller, Director, Division of Reactor Safety, Region III, members of his staff and the Illinois Department of Nuclear Safety on September 7, 1990 in Springfield, Illinois. These documents should include, but not be limited to, any notes or handouts from the meeting, any inspection schedules generated or discussed at the meeting, and any meeting summaries or minutes. The meeting is discussed in Enclosure N to the "Weekly Information Report - Week Ending September 14, 1990" from James Blaha, Assistant for Operations, Office of the EDO, to the Commissioners.

Thank you in advance for responding to this matter. If you have any questions, please feel free to call me at (202) 955-6600.

Sincerely,

Karen Unnerstall

Karen Unnerstall
Legal Assistant

410-586247

FREEDOM OF INFORMATION
ACT REQUEST

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Rec'd 10-30-90