



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

May 4, 2020

MEMORANDUM TO: Anthony D. Masters, Chief  
Reactor Assessment Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

FROM: Tekia V. Govan, Project Manager */RA/*  
Oversight and Support Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY  
PUBLIC MEETING HELD ON APRIL 22, 2020

On April 22, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public teleconference 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 initiatives. The topics discussed during this teleconference are described below.

**NRC's Inspection Response to COVID 19**

The NRC staff discussed the impact of the COVID-19 pandemic on resident inspectors and regional inspections. Resident inspectors are performing their oversight role in a reduced on-site frequency, taking into account performing risk significant inspection activities and a focus on their and licensee safety while considering conditions on-site. Resident inspectors will be performing inspections remotely to the maximum extent possible and going onsite approximately every three days or as warranted. Most regional inspections will be rescheduled; however, some inspections may be conducted remotely. For those inspections conducted remotely, all inspection requirements and objectives are still in effect. Inspectors conducting remote inspection activities are sharing lessons learned and best practices with all NRC inspectors. The NRC staff will share lessons learned and best practices for remote inspections at a future ROP monthly meeting.

**Engineering Inspection Updates**

The NRC staff discussed some of the effects of the COVID-19 pandemic on engineering inspections. Specifically, some engineering inspections would be rescheduled for a future date and a few engineering inspections had portions of the inspection conducted remotely.

CONTACT: Tekia V. Govan, NRR/DRO  
301-415-6197

For those inspections conducted remotely, all inspection requirements and objectives were still met, and licensees provided the inspectors with enough information to independently determine reasonable assurance of adequate protection of the inspection samples. The inspectors conducting remote inspection activities are sharing lessons learned and best practices will be shared with all NRC inspectors. The NRC staff also indicated that the first two power-operated valve (POV) inspections were completed at Cooper Nuclear Station (Cooper) and Sequoyah Nuclear Plant (Sequoyah), with the third POV inspection being completed at Wolf Creek Generating Station. The NRC staff indicated there were three non-cited violations identified at Cooper (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20085H006) and 1 non-cited violation identified at Sequoyah (ADAMS Accession No. ML20112F443). During the meeting, a member of the nuclear industry asked if cross-regional panels were being conducted following all POV inspections and if there were any insights from the panels. The NRC staff responded that cross-regional panels are conducted after each POV inspection. The inspection team findings that have been identified to the cross-regional panels have not changed significantly in the performance deficiency. The NRC staff are tracking lessons learned from conducting the cross-regional panels.

### **Significance Determination Process (SDP) Updates**

The revision to Inspection Manual Chapter (IMC) 0609, "Significance Determination Process," was issued on March 23, 2020 (ADAMS Accession No. ML20013D868) with an effective date of April 30, 2020. This revision provides a clarifying section on the use of IMC 0609 for the "Very Low Safety Significance Issue Resolution" process, as described in IMC 0612, Appendix B, "Additional Issue Screening Guidance," dated December 12, 2019 (ADAMS Accession No. ML19247C384). A note was added to reiterate that the significance of findings related to operational programs still under development should be assessed under IMC 2519, "Construction Significance Determination Process," dated December 6, 2017.

IMC 0609, Appendix H, "Containment Integrity Significance Determination Process," was issued on March 23, 2020 (ADAMS Accession No. ML20078L336) with an effective date of April 30, 2020. The goal of this revision is to provide provisions and detailed guidance to accommodate new reactor designs, specifically the AP1000 design.

With the aforementioned two IMCs going into effect on April 30, 2020, this completes the effort to update and revise the SDP program documents to accommodate AP1000. The other three IMCs include: IMC 0609, Appendix A, "The Significance Determination Process for Findings At-Power" dated December 13, 2019; IMC 0609, Appendix G, "Shutdown Operations Significance Determination Process," and its attachments, dated January 8, 2020; and IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria," dated January 10, 2019. As these reactors begin operation, the NRC will be able to inform and adjust the screening questions and other detailed SDP guidance with operating experience.

The NRC's response to COVID-19 has shifted priorities and created new emergent work. Several public meetings and workshops, which were communicated at previous ROP monthly meetings as potentially occurring in the May/June 2020 timeframe have been postponed. This includes a public meeting related to the radiation protection SDP, a workshop related to shutdown SDP, and the FLEX summit. As information related to these meetings is updated or these meetings are scheduled, those details will be communicated to external stakeholders.

### **NRC Staff's Response to Performance Indicator Frequency Asked Question (FAQ) 20-01**

The NRC staff discussed their proposed response for FAQ 20-01, Nine Mile Point Unit 1 Scram (ADAMS Accession No. ML20108E914). The licensee presented this FAQ during the January 22, 2020, ROP public meeting. In the FAQ the licensee requested guidance interpretation for Question 6 of the Unplanned Scram with Complication performance indicator included in NEI 99-02, Revision 7, for the Nine Mile Point scram that happened on September 6, 2017. The request sought interpretation on how they answered Question 6 of the guidance based on the operator use of an alternate pressure control (i.e. emergency condensers - ECs) when performing Nine Mile Point, Unit 1 (N1) - Emergency Operating Procedure (EOP)-2: RPV Control. After the staff's review it was concluded that NI-EOP-2 is part of their normal scram procedures and the operators did not enter any additional EOPs and no other conditions or equipment issues existed that necessitated extended time in the EOPs. Also, the use of ECs did not require additional time for the operators to control pressure. Their use is very well defined and identified in both procedures used as an option if the turbine bypass valves are not available, as it happened on this event. In conclusion, based on the information provided and reviewed, the event described in this FAQ does not count as a complicated scram. The scram continues to count as an unplanned scram per the Initiating Event – Unplanned Scram (IE01) performance indicator. The NRC staff arrived at this position based on the specific circumstances of this particular event. This conclusion is case-specific and should not be interpreted as applicable to other events that might necessitate use of the emergency condenser.

### **ROP Enhancement Project Closure**

The NRC staff presented the status of the ROP enhancement project which ended in March 2020. The project was considered no longer necessary from a project management perspective. With the closure of the project, NRC staff will address any outstanding work using normal self-assessment work practices. The work that was done early in the project (Phase 1) was presented to the NRC Commission as SECY-19-0067 (ADAMS Package Accession No. ML19070A036); the staff is awaiting Commission direction. Other near-term work, such as the Cross-cutting Issues Program effectiveness review, the Problem Identification and Resolution Inspection Comprehensive review and the Independent Spent Fuel Storage Installation inspection procedure review are ongoing and are expected to be completed in calendar year 2020. The review of the radiation protection inspection procedures was completed in early 2020. These activities were previously referred to as Phase 2 of the ROP enhancement project. Other longer-term work, such as a possible revision to the Mitigating Systems Performance Index performance indicator, continued refinements to risk assessment tools used in the ROP Significance Determination Process and actions to address the emergency preparedness focused-self assessment will continue as priorities and schedules dictate.

### **Communicating with the NRC staff**

At the start of all ROP public meetings, the project manager provides contact information for the public to use to provide their name as a participant in the meeting. This contact information is also provided for submitting questions and comments to the NRC technical staff. Please note that any questions and/or comments pertaining to the ROP project can be sent to [Tekia.Govan@nrc.gov](mailto:Tekia.Govan@nrc.gov). Questions and/or comments will be forward to the appropriate NRC staff. The staff also mentioned the role out of the "Contact Us about ROP" page on the new

ROP website, which can also be used to submit questions and comments regarding the ROP initiative (<https://www.nrc.gov/reactors/operating/oversight/contactus.html>).

**Conclusion**

At the end of the teleconference, NRC and industry management gave closing remarks. NEI expressed appreciation for the open dialogue and willingness of NRC staff to hear industry views. 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

Docket Nos.: 52-025  
52-026

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING ON APRIL 22, 2020

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**ADAMS Accession No.: ML20126G398**

**\* = via email**

<b>OFFICE</b>	<b>NRR/DRO/IRSB/PM</b>	<b>NRR/DRO/IRSB</b>	<b>NRR/DRO/IRAB/BC</b>
<b>NAME</b>	TGovan	BCurran*	AMasters*
<b>DATE</b>	05/04/2020	05/05/2020	05/05/2020

**OFFICIAL RECORD COPY**

## LIST OF ATTENDEES

### REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING

April 22, 2020, 10:00 AM to 12:00 PM

<b>Name</b>	<b>Organization</b>	<b>Name</b>	<b>Organization</b>
James Pak	Dominion Energy	Alex Garmoe	NRC
Lawrence Winker	Pennsylvania Government	Ray Gibson	NRC
Jim Slider	NEI	David Aird	NRC
Gregory Halnon	First Energy Corp	Alonzo Richardson	NRC
Larry Parker	STARS Alliance	Chris Miller	NRC
Paul Schwartz	Department of Environmental Protection (State of New Jersey)	John Cassidy	NRC
Robin Ritzman	Curtiss Wright	Russell Gibbs	NRC
Steve Catron	NextEra	Matt Young	NRC
Stephanie Pyle	Entergy	Tekia Govan	NRC
Ron Gaston	Entergy	Doug Bullock	NRC
David Gudger	Exelon	Ross Telson	NRC
Tony Zimmerman	Duke Energy	Antonio Zoulis	NRC
Thomas Basso	NEI	Phil McKenna	NRC
Carlos Sisco	Winston Strawn LLC	Anthony Masters	NRC
Russell Sharpe	EPM	Mike Montecalvo	NRC
Deann Raleigh	Curtiss Wright	Robert Krsek	NRC
Steve Harrison	Department of Health (State of Virginia)	Tom Hipschman	NRC
Rob Burg	EPM	Eric Bowman	NRC
		Ty Ospino	NRC
		Christopher Cauffman	NRC
		Bob Kahler	NRC
		Mirela Gavrilas	NRC
		Joylynn Quinones	NRC
		Jeremy Tapp	NRC
		Matt Leech	NRC
		Matt Humberstone	NRC
		David Garmon-Candelaria	NRC