



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

November 17, 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/*
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SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY
PUBLIC MEETING HELD ON OCTOBER 28, 2020

On October 28, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting 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.

Status of Power-Operated Valve Inspections

The NRC staff provided an update on an upcoming public meeting, to be held on December 8, 2020, to discuss lessons learned over the past year in conducting Inspection Procedure (IP) 71111.21N.02 "Design-Basis Capability of Power-Operated Valves Under 10 CFR 50.55a Requirements" (POV) inspections.

Performance Indicator (PI) Frequently Asked Questions (FAQ)

FAQ 20-02: Emergency Procedure (EP) 02, Emergency Response Organization (ERO) Drill Participation

On April 15, 2020, FAQ 20-02 was discussed (ADAMS Accession No. 20106D694), transitioned to Final Approved status (ADAMS Accession No. ML20107F675), and became effective immediately. FAQ 20-02 addresses the impact to the ERO PI of deferred EP drills and exercises due to the COVID-19 public health emergency. The extension statement says, in part: "For the COVID-19 event, holders of ERO key positions with end dates on or prior to September 30, 2020, may have their ERO-PI end date extended to December 31, 2020."

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During this meeting, the NRC staff discussed with industry the need to revisit the approved extension. As a result, NEI will revise FAQ 20-02 to propose a new end date. This FAQ will be discussed at the next ROP public meeting. The staff and members from the nuclear industry also discussed the potential impact that an extension on FAQ 20-02 would have on the completion of baseline IP 71151, "Performance Indicator Verification." If the extension to FAQ 20-02 is granted, the NRC staff will assess any impacts on the IP.

FAQ 20-03: Generic – Restoration of Train Monitoring After PRA Model Changes

On August 26, 2020, NEI presented FAQ 20-03 which proposes that when restoring trains/segments to mitigation system performance index (MSPI) monitoring, unavailability data be required only moving forward, including the quarter in which monitoring is restored (ADAMS Accession No. ML20223A373). At this meeting, the NRC staff requested some examples that would provide details of what was being proposed in FAQ 20-03. NEI provided these examples via email (ADAMS Accession No. ML20288A499).

During this meeting, the NRC staff discussed the status of their review of PI FAQ 20-03. Based on its review, the staff raised the idea of a higher threshold in which a three-year review for MSPI data would be required based on the greater potential for a component with a higher Birnbaum value to affect the MSPI outcome. Industry indicated there may be merit to the idea. Further discussion on the topic may occur as part of developing a proposed FAQ response.

FAQ 20-04: Crediting Automated Notifications in the DEP Performance Indicator – Proposed NRC Response

The NRC staff presented a proposed response FAQ 20-04, in which the nuclear industry proposed to add a sentence in the NEI 99-02 guidance to clarify the timeliness criterion for notifications made using a computer application to send an electronic message (ADAMS Accession No. ML20296A325). Based on the nuclear industry accepting the proposed response, FAQ 20-04 was transitioned to Tentatively Approved status (ADAMS Accession No. ML20309A621) and will be discussed at the next ROP meeting to transfer the FAQ to Final Approved status.

FAQ 20-05: River Bend Station (RBS) Unplanned Scram May 2019

Entergy staff presented FAQ 20-05 that describes an event that occurred on May 31, 2019 while RBS was shutting down to repair an 'A' 5th Point Heater tube leak (ADAMS Accession No. ML20288A404). The alignment used for the shutdown caused several situations in which the operators ended up inserting a manual scram following a loss of suction to the 'A' & 'C' FW pumps. RBS classified this event as an Unplanned Scram per 7,000 critical hours. The resident inspectors believe that this event should be classified as an unplanned scram with complications following the flow charts within the NEI 99-02 guidance.

The NRC staff accepted the FAQ 20-05 for review and will have a proposed response in a future public meeting.

Inspection Procedure (IP) 37060, “10 CFR 50.69 Risk-Informed Categorization and Treatment of Structures, Systems, and Components Inspection”

The NRC staff discussed their working group activities to enhance IP 37060, “10 CFR 50.69 Risk-Informed Categorization and Treatment of Structures, Systems, and Components Inspection,” (ADAMS Accession No. ML20192A322). Stakeholders were also made aware of the working group’s charter (ADAMS Accession No. ML20182A687). The purpose, objectives, scope, and key milestones of the charter were discussed.

Modification of the Description of Unplanned Scrams with Complications Performance Indicator to Reflect AP1000 Design

NEI submitted a whitepaper for the NRC staff’s review entitled, “Modification of the Description of Unplanned Scrams with Complications Performance Indicator to Reflect AP100 Design” (ADAMS Accession No. ML20274A258). The NRC staff reviewed the whitepaper in anticipation of this meeting and were ready to discuss some questions regarding the proposal. Specifically, the NRC staff requested a clarification for the loss of power question.

It was proposed by NEI to exclude loss of power to the non-battery-backed uninterruptible power system (IDS) buses (e.g., IDSA-EA-2). This would be acceptable although the NRC asked to clarify the Class 1E instrument and control power buses would be included because power to the Class 1E instrument and control power buses (e.g., IDSA-EA-1) would need to be available/restored from the inverters powered by the battery-supplied dc switchboard if not from the non-battery-backed IDS buses. Licensee representative accepted the NRC comment and agreed to submit a revised version of the whitepaper with the changes for our review and discussion in a future public meeting.

Supplemental Inspection Procedure

The NRC staff discussed the recent process enhancements published in Inspection Manual Chapter (IMC) 2515, Appendix B, “Supplemental Inspection Program,” IMC 0611, Appendix C, “Guidance for Supplemental Inspection Reports,” and IP 95001, “Supplemental Inspection Response to Action Matrix Column 2 Inputs.” The presentation materials for this discussion can be found under ADAMS Accession No. ML20295A347.

Cross Cutting Issues

The NRC staff provided a brief summary of the cross-cutting issues (CCI) program effectiveness review (ADAMS Accession No. ML20297A253), which is documented in a report available in ADAMS Package Accession No. ML20239A806. The package also contains background and supporting information for the report. The review provided an assessment of the CCI program and recommendations, for NRC management’s consideration, to increase the efficiency and effectiveness of the CCI program. Further public engagement would occur should NRC management decide to pursue any of the recommendations.

Problem Identification and Resolution

The NRC staff presented the status of the Problem Identification and Resolution (PI&R) comprehensive review, as documented in IP 71152, “Problem Identification and Resolution.” The comprehensive review began after the submittal of SECY-19-0067, “Recommendations for Enhancing the Reactor Oversight Process” in June 2019 (ADAMS

Accession No. ML19070A036). A 14-member team of NRC headquarters staff and regional inspectors performed the review consistent with the team charter (ADAMS Accession No. ML19212A017). Key objectives of the review:

- ensure the purpose of the inspection is well defined to accomplish its objectives,
- ensure there is consistency in execution and documentation across the regions,
- make better use of risk insights and integrating them into other inspections and the annual End of Cycle assessment, and
- provide clearer criteria for inspectors and regional management to use when determining if a licensee's PI&R processes including corrective action programs are ineffective or has substantial weaknesses.

The team has prepared a draft report of the review that will be publicly available. Prior to issuance of the report, it will be reviewed internally by NRC staff and the various options developed by the NRC team and NRC management's preferences for implementation will then be discussed with nuclear industry representatives and members of the public. The report is anticipated to be ready for public engagement in the first calendar quarter of 2021.

Operator Performance Trend

The NRC staff discussed its observation that there have been an elevated number of events caused by lapses in operator fundamentals since 2017 (ADAMS Accession No. ML20297A361). The staff discussed some of these events at a high level, focusing on those that resulted in plant trips (automatic protective shutdowns). Previous industry and NRC actions, such as NRC issued Information Notices and the Institute of Nuclear Power Operations (INPO) Event Reports, have not effectively addressed the issue. The NRC staff is considering additional action and opened the topic for discussion in this public forum.

Update on FLEX Operator Experience Smart Sample

The NRC staff provided a brief update on the IP for Operating Experience Smart Sample – "FLEX Equipment Design Control, Maintenance, and Testing," which was issued October 2020. This IP can be found in ADAMS under Accession No. ML20220A261.

Significance Determination Process (SDP) Update, IMC 0609, Appendix A, At-Power SDP

The NRC staff discussed the proposed revisions to IMC 0609, Appendix A, "The Significance Determination Process for Findings At-Power" and its basis document, IMC 0609, Attachment 3, Appendix A, "Technical Basis for the At-Power Significance Determination Process." The NRC staff provided a summary of the proposed revisions to the loss of coolant accident initiator, fuel cladding integrity, and FLEX screening questions in IMC 0609 Appendix A (ADAMS Accession No. ML20295A269). The NRC staff also discussed that the basis document is being revised to add a basis for each of the screening questions. Industry expressed their desire to review the proposed revision to IMC 0609, Appendix A, before issuance. Therefore, the proposed revisions to IMC 0609, Appendix A, and IMC 0609, Attachment 3, Appendix A, are publicly available under ADAMS Accession Nos. ML20308A592 and ML20308A601, respectively, for discussion at the November 2020 ROP monthly public meeting.

SDP Update, IMC 0609, Appendices C and D, Radiation Protections SDPs

The NRC staff provided highlights from a public meeting that was held on October 21, 2020 to discuss updates to the Radiation Safety Significance Determination Process documents. Details of the October 21, 2020 meeting can be found under ADAMS Accession No. ML20294A186.

Meeting Action Items

1. NEI committed to resubmitting a revision for PI FAQ 20-02. This revision will be discussed at the next ROP meeting.
2. NEI agreed to resubmit whitepaper for the NRC staff's review entitled, "Modification of the Description of Unplanned Scrams with Complications Performance Indicator to Reflect AP100 Design." The submittal will address some of the NRC staff's comments discussed during this meeting.
3. During the October ROP meeting, the staff received two questions from Tony Zimmerman of Duke Energy. Below are the staff's responses to those questions below.

Question 1: In the past, a common cause for failing to successfully complete a 9500x inspection was that the NRC felt the licensee failed to adequately assess the full Extent of Condition or Extent of Cause. NEI/Industry and NRC had dialogue at the start of phase 2 of ROP Enhancement that there may be benefit in considering what constitutes an appropriate scope for an Extent of Condition or Cause review.

NRC Response 1: The primary source of NRC governance explicitly addressing extent-of-condition and extent-of-cause inspection for Action Matrix Column 2 Inputs is Inspection Procedure (IP) 95001 "Supplemental Inspection Response to Action Matrix Column 2 Inputs." Inspection Manual Chapter (IMC) 2515 App. B "Supplemental Inspection Program," is the principle resource for supplemental inspection-related governance applicable to multiple supplemental IPs. Both of these documents were recently revised.

IP 95001 content applicable to multiple supplemental IPs was relocated to IMC 2515B. Content explicitly related to extent-of-condition and extent-of-cause was fundamentally unchanged. As briefed the October 2020 ROP presentation (ADAMS Accession No. ML20295A347), supplemental inspection program enhancements were incorporated to promote more effective, transparent, objective, predictable, and scrutable supplemental inspection, assessment, communications, documentation, and follow-up inspection.

The enhancements largely apply to the full scope of the supplemental inspection process – not just to extent-of-condition and extent-of-cause inspection, assessment, and documentation. A few of these broad enhancements (ADAMS Accession No. ML20295A347):

- a) 2515B-04 Definitions – Acknowledges that licensee language may differ from definitions used in the program and focuses inspection on the effectiveness of licensee analyses, documentation, and actions to preclude repetition of significant

(i.e. greater-than-green) licensee performance issues whether reflected by findings or performance indicators – not nomenclature.

- b) 2515B-07 Enhanced Inspection, Assessment, and Successful Completion – Emphasizes the enhanced level of inspection, assessment, and documentation necessary in supplemental inspection in comparison to other inspection activities – regardless of whether an issue is being closed or held open. Reinforces and fully aligns governance with approved ROP bases applicable to supplemental inspection (including extent-of-condition and extent-of-cause inspection, assessment, and documentation).
- c) 2515B-08 Initiating, Delaying, Suspending, or Expanding Supplemental Inspection – Addresses past issues in these areas and reinforces the importance of prompt, effective inspector communication with licensee and NRC management prior to suspending or expanding a supplemental inspection (including issues associated with extent-of-condition, extent-of-cause).
- d) 2515B-09 Findings, Violations, General- and Significant Weaknesses – More clearly differentiates minor, general, and significant weaknesses and associated NRC actions (including weaknesses associated with extent-of-condition, extent-of-cause) in relation to findings and violations.
- e) IMC 2515B-10 Inspector Requirements, Reactor Oversight Process (ROP) Expectations, and Regulatory Obligations – More clearly differentiates inspector requirements, ROP expectations, and regulatory obligations in the context of weaknesses identified during supplemental inspection (including weaknesses associated with extent-of-condition, extent-of-cause).
- f) IMC 2515B-11 Follow-up Inspection of Planned Corrective Actions – Facilitates measures to ensure follow-up inspection of acceptably-planned but incomplete or uninspected corrective actions to preclude repetition of GTG performance issues (including those associated with extent-of-condition, extent-of-cause).

Question 2: Are there plans to provide additional clarity to NRC inspectors through internal training/documents that would minimize confusion on what is the correct scope for those reviews.

NRC Response 2: The NRC plans to provide additional clarity associated with supplemental inspection process enhancements to NRC inspectors and managers through internal training and enhanced governance documents. The training is not specific to the scope of extent-of-condition and extent-of-cause reviews but will not explicitly exclude those topics.

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. 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 meeting, 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

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING ON OCTOBER 28, 2020. DATED: NOVEMBER 17, 2020

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ADAMS Accession No.: ML20322A191

***via email**

OFFICE	NRR/DRO/IRAB/PM	NRR/DRO/IRSB	NRR/DRO/IRAB/BC	NRR/DRO/IRAB/PM
NAME	TGovan*	BCurran*	AMasters*	TGovan*
DATE	11/16/2020	11/16/2020	11/17/2020	11/17/2020

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LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING

October 28, 2020, 9:00 AM to 12:30 PM

Name	Organization¹	Name	Organization
Justin Wearne	NEI	Alex Garmoe	NRC
Ken Heffner	Certrec	Rob Krsek	NRC
Jim Slider	NEI	David Aird	NRC
Shannon Rafferty-Czincila	Exelon	Alonzo Richardson	NRC
Tim Schenk	River Bend Station	Heather Jones	NRC
Jonathan Johnson	TVA	Robert Kahler	NRC
Robin Ritzman	Curtiss Wright	Julio Lara	NRC
Steve Catron	NextEra	Jeffrey Bream	NRC
Stephanie Pyle	Entergy	Tekia Govan	NRC
Joe Cole	SNC Licensing	Douglas Bollock	NRC
John Giddens	Entergy	Jason Drake	NRC
Tony Zimmerman	Duke Energy	Christopher Cauffman	NRC
Kevin McCarthy	Entergy	Phil McKenna	NRC
Carlos Sisco	Winston Strawn LLC	Anthony Masters	NRC
John Fralick	Entergy	Steven Campbell	NRC
Enrique Melendez-Asensio	Consejo de Seguridad Nuclear	Russ Cassara	NRC
Melanie Brown	Southern Nuclear	Charles Murray	NRC
Rob Burg	EPM	Eric Bowman	NRC
Lori Tkaczyk	Unknown	Kent Chambliss	NRC
Larry Nicholson	Certrec	Eric Duncan	NRC
Tom Basso	Unknown	Matthew Leech	NRC
David Mannai	Unknown	Raymond Gibson	NRC
Paul Bradley	Unknown	Russell Gibbs	NRC
Linda Dewhirst	Unknown	Jasmine Gilliam	NRC
Gregory Ferrigno	Unknown	Jeremy Groom	NRC
Steven Dolley	S&P Global Platts	Maria Groshner	NRC
Martin Phalen	Unknown	David Garmon- Candelaria	NRC
Nicole Good	STARS Alliance	Joylynn Quinones- Navarro	NRC
Chris Earls	Unknown	Ravi Grover	NRC
Steve Geier	NEI	Andy Rosebrook	NRC
Edwin Lyman	Union of Concerned Scientist	Emma Haywood	NRC
Shane Gatter	Unknown	Michael Webb	NRC

¹ Unknown organization indicates that the participant's affiliation was not provided by the issuance of this meeting summary.

Name	Organization	Name	Organization
Cheryl Ann Gayheart	Unknown	Sherlyn Haney	NRC
Jonathan Hartman	Unknown	Shakur Walker	NRC
Lisa Hogg	Unknown	Thomas Hipschman	NRC
Jerry Humphreys	Unknown	Tara Inverso	NRC
Matthew Euten	Unknown	Marc Ferdas	NRC
Pamela Frazier	Unknown	Ken Kolaczyk	NRC
Michael Kennard	Unknown	John Hughey	NRC
Brian Kremker	Unknown	Don Johnson	NRC
Steven Martin	Unknown	Russell Felts	NRC
Helen Levendosky	Unknown	Harry Freeman	NRC
Kelli Anne Roberts	Unknown	Thomas Fredette	NRC
Rebeca Saiz	Unknown	Daniel Ju	NRC
Martin Murphy	Xcel Energy	Michelle Kichline	NRC
Kari Osborne	Unknown	Lisa Regner	NRC
Jennifer Varnedoe	Unknown	Jason Kozal	NRC
Jeffrey Vollmer	Unknown	Julio Lara	NRC
Tim Riti	NEI	Aron Lewin	NRC
Jean Fleming	PSEG	Rebecca Sigmon	NRC
David Young	NEI	Greg Suber	NRC
		Ross Telson	NRC
		Eric Thomas	NRC
		Mike Montecalvo	NRC
		Jeff Mitman	NRC
		Chris Miller	NRC
		Hironori Peterson	NRC
		Laura Kozak	NRC
		Rayo Kumana	NRC
		John Lane	NRC
		Mike McCoppin	NRC
		Eric Magnuson	NRC
		Chris Swisher	NRC
		Chris Speer	NRC
		Muzammil Siddiqui	NRC
		Stephanie Morrow	NRC
		Ching Ng	NRC
		Ty Ospino	NRC
		Brain Parks	NRC
		Derek Widmayer	NRC
		Raymond Trelka	NRC
		Daniel Turpin	NRC
		Dave Werkheiser	NRC
		Jimi Yerokun	NRC
		Matt Young	NRC