



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

February 16, 2021

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
Reactor Assessment Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY
PUBLIC MEETING HELD ON JANUARY 27, 2021

On January 27, 2021, 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.

Performance Indicator (PI) Frequently Asked Questions (FAQ)

FAQ 20-03: Restoration of Train Monitoring After PRA Model Changes (ADAMS as Accession No. ML21021A090)

This FAQ was submitted to propose that when restoring trains/segments to mitigating system performance index (MSPI) monitoring, unavailability data be required only moving forward (including the quarter in which monitoring is restored) and not for the 12 preceding quarters. After the review of the proposed change, the NRC staff agreed to the proposed language to modify guidance in NEI 99-02, Revision 7, "Regulatory Assessment Performance Indicator Guideline." The FAQ status was transitioned to "Tentatively Approved" and will be transitioned to "Final Approved" at the February 2021 ROP meeting.

FAQ 20-05: River Bend Station (RBS) Unplanned Scram May 2019 (ADAMS as Accession No. ML21028A347)

This FAQ is associated with an RBS feedwater heater tube leak that required a rapid shutdown for repair on May 31, 2019. RBS believed that this event should be counted as an unplanned scram per 7,000 Critical Hours (IE01). After the staff's review of this FAQ and other documents

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Related to the event, it was determined that the event that occurred on May 31, 2019, should be classified as an unplanned scram with complications (IE03). The FAQ status was transitioned to “Tentatively Approved” and will be transitioned to “Final Approved” at the February 2021 ROP meeting.

FAQ 20-06: Grand Gulf Nuclear Station (GGNS) Turbine Controls Upgrade Scrams One-Time Exemption (ADAMS as Accession No. ML21028A387)

GGNS submitted this PI FAQ requesting that only the first of two scrams that were associated with a turbine controls upgrade project (on May 25, 2020 and August 8, 2020) be counted as one scram, with the basis that the design errors that contributed to both scrams “were the result of the same vendor not validating assumptions as part of the Turbine Controls Upgrade Project.” Based on the staff’s review of the information provided within the FAQ and information gathered during a December 29, 2020 public meeting (ADAMS as Accession No. ML21013A550), the staff determined that both scrams should be counted in the IE01 PI. The FAQ status was transitioned to “Tentatively Approved” and will be transitioned to “Final Approved” at the February 2021 ROP meeting.

FAQ 21-01: Unplanned Scrams with Complications AP1000 (ADAMS as Accession No. ML21028A391)

This FAQ was submitted by NEI to seek implement changes to NEI 99-02 that were proposed in a whitepaper approved by the NRC at an ROP public meeting on November 18, 2020 (ADAMS Accession Nos. ML20322A339 and ML20339A592). After the staff’s review of the propose changes, this FAQ status was transitioned to “Tentatively Approved” and will be transitioned to “Final Approved” at the February 2021 ROP meeting.

Lessons Learned and Best Practices on Reactor Oversight During the COVID 19 Pandemic

The NRC staff briefed industry representatives and members of the public on the initial lessons learned and best practices identified on the regulatory oversight of operating power reactors during the COVID-19 public health emergency (ADAMS Accession No. ML21022A200). The lessons learned and best practices are documented in the report entitled, “Initial Report on Challenges, Lessons Learned and Best Practices from the 2020 COVID-19 Public Health Emergency – Focus on Regulatory Oversight of Operating Nuclear Reactors,” (ADAMS Accession No. ML20308A389).

A 17-member team of NRC staff primarily used the results of a 24-question survey that was sent to all NRC inspectors, staff and managers involved in the oversight of operating power reactors. The survey results were evaluated and used to develop recommendations to improve oversight during the current and future public health emergencies and non-emergency conditions.

The recommendations, which have not been decided upon, focus on three major areas which include:

- Information Technology Capability and Reliability
- Remote Inspection Practices
- Inspection Guidance Enhancements

External stakeholders, including industry representatives and a member of the public commented on the following areas:

- use of quantitative measures for the lessons learned and best practices effort
- value of in-person inspections versus remote inspections
- need for standardized approaches on preparations for team inspections
- whether lessons learned identified in the report should apply to non-emergency conditions
- potential cyber concerns for NRC remote access to plant information and licensee programs
- whether increased remote oversight had caused an apparent reduction in number of inspection findings

The staff discussed these areas during the meeting with no additional follow-up questions. An industry representative stated that the industry was performing a lessons-learned initiative and would present the results at a future public meeting.

10 CFR Part 50.55a/Power-Operated Valve (POV)

The NRC staff provided an overview of the first year of implementing POV inspections. This overview prompted a discussion on the 2017 rule change in which the NRC incorporated by reference the 2012 Edition of the ASME OM Code in 10 CFR 50.55a. The NRC staff answered three questions from industry regarding that rule and POV inspections:

1. What requirement will inspectors verify regarding supplemental valve position indication requirements?
NRC Staff Response: Inspectors would inspect to 10 CFR 50.55a(b)(3)(xi), and paragraph ISTC-3700 of the ASME OM Code. NRC staff also added that inspectors will verify that the licensees have performed the testing in accordance with the ISTC-3700 schedule of two years since the previous testing and if licensees use the 6 month grace period they will need to have justified the reason in accordance with the ASME OM Code.
2. Is concurrent testing for supplemental valve position indication testing required?
NRC Staff Response: No, concurrent testing is not required as allowed by ISTC-3700.
3. When is compliance with 10 CFR 50.55a(b)(3)(xi) required and what is the frequency of the supplemental testing?
NRC Staff Response: The rule condition to become effective when updating to the 2012 Edition of the OM Code and that ISTC-3700 requires valve position testing every 2 years and the (b)(3)(xi) condition applies when the ISTC-3700 test is performed (2 years from the previous test).

Industry representatives stated that they did not agree with the NRC staff position, and that they believed the next ISTC-3700 test was to be performed within 2 years from updating to the 2012 Edition of the OM code. The NRC staff shared that this question and answer was specifically addressed in the rulemaking process and package and can be found on pages 37-38 (ADAMS Accession No. ML16130A531), which specifically stated the 2 year performance did not begin after updating to the 2012 Edition of the Code and therefore the NRC position was finalized in the 2017 rulemaking. The NRC

staff and industry representatives discussed a few examples of when testing was required. A visual representation of what is acceptable can be found at under ADAMS Accession No. ML21032A238. The NRC staff also discussed with industry that the NRC is open to the option of requesting relief to extend testing beyond the 2 years and grace period if that was in the best interest of safety of the plant and valves in question.

Inspection Procedure (IP) 370060 – Enhancement Working Group Updates

The NRC staff provided an update on working group activities associated with enhancement of IP 37060, “10 CFR 50.69 Risk-Informed Categorization and Treatment of Structures, Systems, and Components Inspection” (ADAMS Accession No. ML20182A687). Stakeholders were informed of the development of “IP 37060 Potential Enhancement Items” (ADAMS Accession No. ML20345A122) which will be used to develop draft recommendations for enhancing IP 37060.

Independent Spent Fuel Storage Installation (ISFSI) Enhancement Update

The NRC staff provided an update on the overall status of the ISFSI inspection program enhancement activities. As background, the staff discussed that during the last update the NRC was performing implementation activities for the final approved recommendations. This included revisions to the ISFSI inspection program documents as well as a new inspection manual chapter for the ISFSI inspection program technical basis. The staff then discussed that at this time, the NRC has completed the revisions to the ISFSI inspection program documents, specifically the suite of ISFSI inspection procedures, ISFSI inspection program manual chapter, and new ISFSI inspection program technical basis document. All of these program documents have been issued as of late December 2020 and went into effect on January 1, 2021. The staff also noted that three ISFSI IPs (IP 60854.1, IP 60855.1, and IP 60856.1) are planned to be retired in the near future but are still available and on the NRC inspection manual public webpage so that inspections can be closed out from 2020.

NEI Reactor Oversight Process Whitepaper - Counting of DEP Opportunities from an Actual Emergency Following a Retraction of the Emergency Declaration

The NRC staff re-opened NEI White Paper, “Counting of DEP Opportunities from an Actual Emergency Following a Retraction of the Emergency Declaration,” (ADAMS Accession No. ML19339H435) to provide an opportunity to further enhance the language to ensure consistent understanding of the issue.

Meeting Action Items

NEI has committed to providing a revision to the White Paper, “Counting of DEP Opportunities from an Actual Emergency Following a Retraction of the Emergency Declaration.”

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 forwarded 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 the 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

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ADAMS Accession No.: ML21047A290

*** = via email**

OFFICE	NRR/DRO/IRAB/PM	NRR/DRO/IRSB	NRR/DRO/IRAB/BC	NRR/DRO/IRAB/PM
NAME	TGovan*	BCurran*	AMasters*	TGovan*
DATE	02/16/2021	02/16/2021	02/16/2021	02/16/2021

OFFICIAL RECORD COPY

LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING

January 27, 2021, 9:30 AM to 12:00 PM

Name	Organization¹	Name	Organization
James Gilbert	Unknown	Alex Garmoe	NRC
Ken Heffner	Certrec	Kevin Hsueh	NRC
Jim Slider	NEI	Jason Drake	NRC
Matthew Euten	Unknown	Julio Lara	NRC
Marcellus Ruff	Exelon Nuclear	Heather Jones	NRC
Tim Riti	NEI	Rick Deese	NRC
Robin Ritzman	Curtiss Wright	Antonios Zoulis	NRC
Martin Murphy	Xcel Energy	Mike King	NRC
John Giddens	Entergy	Tekia Govan	NRC
Steve Catron	Next Era	Daniel Merzke	NRC
Joe Cole	Vogle Licensing	Todd Keene	NRC
Tony Zimmerman	Duke Energy	Shakur Walker	NRC
William Reynolds	Exelon	Angela Buford	NRC
Carlos Sisco	Winston Strawn LLC	Anthony Masters	NRC
Christopher Pendleton	Southern Nuclear	Thomas Hipschman	NRC
Daniel McGinnis	Dominion Energy	Gurjendra Bedi	NRC
Keith Brown	Unknown	Charles Murray	NRC
Rob Burg	EPM	Christopher Cauffman	NRC
Roy Linthicum	Exelon	Paula Cooper	NRC
Larry Nicholson	Certrec	Eric Duncan	NRC
Tom Basso	Unknown	Scott Burnell	NRC
Bill Doody	PSEG Nuclear	Mike Montecalvo	NRC
David Young	NEI	Russell Gibbs	NRC
Ray Kellar	Unknown	Manuel Crespo	NRC
Greg Holmes	GE Hitachi	Billy Gleaves	NRC
Cheryl Gayheart	Southern Nuclear	Bill Maier	NRC
Curt Reynolds	Exelon	David Garmon- Candelaria	NRC
Steve Sayovitz	Unknown	Joylynn Quinones- Navarro	NRC
Maggie Staiger	Unknown	Ravi Grover	NRC
Chris Nolan	Unknown	Michael Webb	NRC
Mandy Halter	Entergy	Russell Felts	NRC
David Dobson	Unknown	Marc Ferdas	NRC
Adam Goodman	Unknown	Ken Kolaczyk	NRC
Kevin Walden	Unknown	John Hughey	NRC

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

Name	Organization	Name	Organization
Jack Hicks	Unknown	Thomas Fredette	NRC
Rodney Vickers	Exelon	Aron Lewin	NRC
Justin Bresson	Unknown	Dave Werkheiser	NRC
Michael Ellett	Indian Michigan Power	Gregory Suber	NRC
Marty Phalen	Unknown	Douglas Bollock	NRC
Ashley Burress	Exelon	Jason Kozal	NRC
Shannon Rafferty-Czincila	Exelon	Robert Krsek	NRC
Nicholas Hansing	Unknown	Thomas Scarbrough	NRC
Pamela Frazier	Unknown	Don Johnson	NRC
Wesley Sparkman	Unknown	Derek Widmayer	NRC
David Gudger	Exelon	Ross Telson	NRC
Isaac Mulhern	Unknown	Coleman Curran	NRC
Ron Gaston	Unknown	Michael McCoppin	NRC
James Love	Unknown	Rodney Clagg	NRC
Jonathan Hartman	Southern Co.	Kent Chambliss	NRC
Enrique Melendez Asensio	CSN, Spanish Nuclear Regulator	Chris Kline	NRC
James Pak	Dominion Energy	Juan Arellano	NRC
Casey Smith	Unknown	Andy Rosebrook	NRC
David Barrow	Unknown	Kevin Fay	NRC
Jared Smith	Exelon	Steve Smith	NRC
Denver Atwood	Unknown	David Rivard	NRC
Fredrick Sarantakos	Exelon	Deann Raleigh	NRC
Brad Bishop	Unknown	Megan Gangewere	NRC
Eric Magnuson	NRC	Michael Hay	NRC
Muzammil Siddiqui	NRC	Timothy Steadham	NRC
Jeff Mitman	NRC	Nick Smalley	NRC
Chris Miller	NRC	Rayo Kumana	NRC
Raymond Trelka	NRC	Karla Stoedter	NRC
Laura Kozak	NRC	Robert Vadella	NRC
Michael Farnan	NRC	Cheryl Khan	NRC
Dariusz Szwarc	NRC	Dong Park	NRC
Ed Miller	NRC	Eli Garcia	NRC
Jeremy Tapp	NRC	Julie Kulik	NRC
Nicole Fields	NRC	Tyler Beck	NRC
Bridget Curran	NRC	Audrey Klett	NRC
Amber Donley	NRC	Lisa Regner	NRC
Larry Grimes	NRC	Steve Campbell	NRC
Matthew Leech	NRC		