



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

June 8, 2023

MEMORANDUM TO: Philip J. McKenna, Chief
Reactor Assessment Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

FROM: David M. Aird, Reactor Operations Engineer */RA/*
Reactor Assessment Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS
BI-MONTHLY PUBLIC MEETING HELD ON MAY 18, 2023

On May 18, 2023, 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, other senior industry executives, and various external stakeholders to discuss the staff's progress on initiatives related to the ROP. The topics discussed during this hybrid meeting are described below.

ROP Enhancement and Self-Assessment Activities for Calendar Year 2023

The NRC staff provided an update on the status of the ROP Enhancement Commission SECY papers schedule (ADAMS Accession No. ML22025A132). At the April 2023 ROP public meeting the NRC staff provided an overview of the status of implementing Commission direction in SRM-SECY-22-0086, "Recommendations for Revising the Reactor Oversight Process Assessment Program," dated March 10, 2023. The staff described planned changes to Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program." As part of this revision the staff briefed that the definition for a held open finding was being changed to a finding that remains open when a licensee does not satisfy all objectives of the supplemental inspection, and the date of closure for a held open finding would be the date of issuance of the satisfactory supplemental inspection and assessment follow-up letter. The IMC 0305 revision was issued on May 4, 2023, and the NRC decided to keep the closure date the same for satisfactory completion of supplemental inspections and if a subsequent supplement inspection is necessary. The closure date will be the date of the supplemental inspection (or subsequent supplemental inspection) exit meeting. The term "held open finding" was removed from IMC 0305.

CONTACT: David M. Aird, NRR/DRO
301-287-0725

The proposed performance indicator (PI) change to retire the Indicator for Licensee Alert and Notification System Availability and to Develop a Performance Indicator for Emergency Response Facility and Equipment Readiness, SECY-23-0010, (ML22252A129) was issued on January 30, 2023 and the Commission has not completed voting on this SECY. The White/Yellow findings description revision in IMC 0609 is ready to be issued but will wait until a corresponding change to the Enforcement Policy is sent to the Commission by a SECY paper. This SECY paper is expected to be issued in June 2023.

The NRC staff discussed the plans for the ROP Self-Assessment Activities for 2023 which include completion of the Safety Culture Effectiveness Review that began in 2022, the Region II ROP Implementation Audit, and a program area evaluation that will consist of a review of the security significance determination process (SDP).

Insights from Age-Related Degradation (ARD) Public Workshop

The NRC staff described a summary of the webinar public workshop conducted on April 18, 2023, regarding the new inspection, "Age-Related Degradation." The summary of that meeting can be found on the NRC's public website and at ML23137A051.

The NRC staff shared that training of the NRC inspection staff was starting for the ARD inspections and that the first ARD inspection will be completed after July 2023. The slides for the NRC inspection training can be found on NRC's public website and at ML23138A285. Staff also indicated that NRC cross-regional panels will be held following the inspection completion prior to the inspection report issuance. Staff also addressed questions from the nuclear industry regarding implementation of the inspection procedure.

The NRC staff discussed that it is open to holding future public meetings after inspector training to share any insights from the training with external stakeholders.

Age-Related Degradation Summary of April 18 Public Workshop - ML23137A051
<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23137A051>

Age-Related Degradation Inspector Training Slides - ML23138A285
<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23138A285>

Plan for revising Inspection Procedure 71152, "Problem Identification and Resolution"

The NRC staff presented a status of upcoming changes to the Problem Identification and resolution (PI&R) procedure, IP 71152. The staff discussed SRM-SECY-22-0087, which provided Commission direction to NRC staff to; (1) maintain the PI&R team inspection at a biennial frequency and (2) maintain the current inspection hours for the procedure. As a result of the recommendations from the PI&R comprehensive review (ML20247J590), NRC staff will update the procedure format and include additional assessment guidance for the performance and documentation of biennial team inspections. In addition, the staff will close all outstanding ROP feedback forms and lessons learned actions related to IP 71152.

Presentation - PI&R Procedure Brief for May 2023 ROP Public Meeting - ML23136A589
<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23136A589>

Proposed Industry Frequently Asked Questions (FAQs)

Representatives from NEI and industry introduced FAQ 23-02 where guidance for interpretation of BWR Flowchart questions 2 and 5 for a Peach Bottom reactor scram on May 16, 2022. The initiating event for the scram was de-energization of both buses of the reactor protection system (RPS). This resulted in a reactor scram and Group 1 isolation, closing all main steam isolation valves (MSIVs). All control rods inserted as expected during the scram. Four safety relief valves (SRVs) of the 11 SRVs opened to mitigate the reactor pressure rise, as expected. Following the initial transient, operators established pressure control in accordance with T-101, "RPV Control," which is entered as part of normal scram response. Additionally, the response was aligned with procedure OP-PB-101-111-1001, "Strategies for Successful Transient Mitigation." Reactor Core Isolation Cooling (RCIC) was the primary method of level control with initial supplementation from High Pressure Coolant Injection (HPCI). Operators utilized SRVs manually in addition to HPCI in pressure control mode to maintain reactor pressure, as outlined in station procedures. No SRVs cycled automatically subsequent to the initial transient, and no SRVs failed open.

Representatives from NEI and industry also introduced a whitepaper - "Modification of the Description of Unplanned Scrams with Complications [USwC] Performance Indicator to Reflect AP1000 Design." This whitepaper describes changes to NEI 99-02 needed to add AP1000-specific features and terminology to the USwC performance indicator guidance. These changes provide clarity for use with the AP1000 plant terminology, design, and procedures.

FAQ 23-02 Peach Bottom Performance Indicator Interpretation Request - ML23136A605
<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23136A605>

Whitepaper - Modification of the Description of Unplanned Scrams with Complications
Performance Indicator to Reflect AP1000 Design - ML23136A607
<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23136A607>

Update on NEI 99-02 Revision 8

Staff from NEI provided an update on the upcoming revision 8 of NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," incorporating approved FAQs since revision 7.

Draft FAQ response on the applicability of Part 26 requirements to contractor travel time

The NRC staff presented an overview of a draft response to an inquiry from the public concerning the accounting of work hours for contractors traveling from one nuclear power plant site to another. The presentation highlighted the considerations that the staff identified as important to responding to the inquiry and showed how the draft response was developed by drawing together existing guidance from Regulatory Guide 5.73, "Fatigue Management for Nuclear Power Plant Personnel" (ML083450028), NEI 06-11, Revision 1, "Managing Personnel Fatigue at Nuclear Power Reactor Sites," (ML083110161), and responses to questions previously addressed by NRC in its responses to FAQs about managing fatigue. The purpose of the presentation was to solicit stakeholder comments on the draft response. Following the staff presentation several meeting participants offered preliminary comments. One nuclear utility representative noted that tracking contractor travel time would be an additional burden on licensees as it was not a current practice for this licensee and time would be needed to be able to implement the guidance. Another licensee representative commented that travel time was not viewed as work for the licensee and that the question asked of the NRC concerned the contractor's, rather than the licensee's, responsibility for tracking the hours. A third

representative questioned the applicability of the work hour control requirements given the applicability statement in 10 CFR 26.4.

Presentation - Draft FAQ Response on Applicability of Work Hour Controls to Contractor Travel Time - ML23131A397

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23131A397>

Draft FAQ Response to public inquiry concerning applicability of 10 CFR Part 26, "Fitness for Duty Programs" requirements to contractor travel time - ML23121A212

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23121A212>

Follow-up discussion on safety culture

Staff from NEI discussed the highlights from the letter they submitted to the NRC on May 9, 2023 (ML23135A733) that reiterated their concerns with the implications of the staff's recommendations from the Safety Culture Effectiveness Review effort (ML22340A452). NEI had previously discussed their concerns during the April 5, 2023 ROP public meeting after NRC issued the Safety Culture Effectiveness Review working group report. The NRC staff highlighted that NRC management was currently evaluating the working group's recommendations and has committed to industry that the recommendations that NRC management decides for implementation would be brought back to a future ROP public meeting for discussion.

Letter - NEI Comments on NRC Safety Culture Program Effectiveness Review - ML23135A733

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23135A733>

Presentation - NEI Safety Culture Presentation for ROP Public Meeting - ML23136A591

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23136A591>

Closure of FAQ 23-01

The NRC's proposed response to FAQ 23-01 DC Cook Unit 1 Unplanned Scram Exemption Request (ML23090A226) was discussed at the April 5 ROP Public meeting.

The FAQ was finalized and approved after that meeting and is officially closed.

FAQ 23-01 Rev. 1 DC Cook Unit 1 Unplanned Scram Exemption Request - ML23104A432

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23104A432>

The Next ROP Meeting

The next ROP bi-monthly public meeting is tentatively scheduled for July 13, 2023.

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 can be sent to David.Aird@nrc.gov. Questions and/or comments will be forward to the appropriate NRC staff. The "Contact Us about ROP" page on the ROP public website can also be used to submit questions and comments regarding the ROP (<https://www.nrc.gov/reactors/operating/oversight/contactus.html>).

Conclusion

At the end of the meeting, NRC and industry management gave closing remarks. The industry representatives 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 following link contains the meeting agenda and other information:

<https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML23125A021>

The enclosure provides the attendance list for this meeting.

Enclosure:
As stated

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS BI-MONTHLY PUBLIC MEETING HELD ON MAY 18, 2023 - DATED JUNE 8, 2023

ADAMS Accession No.: ML23159A144

*** = via email**

OFFICE	NRR/DRO/IRAB	NRR/DRO/IRAB/BC	NRR/DRO/IRAB
NAME	DAird	PMcKenna*	DAird
DATE	6/2/2023	6/7/2023	6/8/2023

OFFICIAL RECORD COPY

LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS BI-MONTHLY PUBLIC MEETING

May 18, 2023 - 9:00 AM to 12:00 PM

Name	Organization¹	Name	Organization
Tim Riti	NEI	David Aird	NRC
Tony Brown	NEI	Alex Garmoe	NRC
Steve Catron	NextEra	Phil McKenna	NRC
Ken Mack	NextEra	Russell Felts	NRC
Brian McCabe	NEI	Ami Agrawal	NRC
Justin Wearn	PSEG	Marc Ferdas	NRC
Brett Titus	NEI	Don Johnson	NRC
Brad Dolan	TVA	Aron Lewin	NRC
Thomas Perry	Dominion	Antonios Zoulis	NRC
Stephenie Pyle	Entergy	Molly Keefe-Forsyth	NRC
Lee Marabella	PSEG	Billy Gleaves	NRC
Nicole Good	STARS Alliance	Rebecca Sigmon	NRC
Edwin Lyman	UCS	Hironori Peterson	NRC
Robin Ritzman	Curtiss-Wright	Dan Merzke	NRC
Larry Nicholson	Certrec	Paul Peduzzi	NRC
David Gudger	Constellation Nuclear	Stephanie Morrow	NRC
Phil Couture	Entergy	Zack Hollcraft	NRC
Francis Mascitelli	Constellation Nuclear	Hang Vu	NRC
Rob Burg	EPM, Inc.	Sarah Obadina	NRC
Tammy Morin	PSEG	Bridget Curran	NRC
James Pak	Dominion Energy	William Rautzen	NRC
Marty Murphy	Xcel Energy	Brian Hughes	NRC
Ryan Joyce	Southern Nuclear	Marcus Chisolm	NRC
Anthony Clore	NEI	David Garmon	NRC
Deann Raleigh	Curtis-Wright	Tom Hipschman	NRC
Justin Bouknight	Dominion	Ron Cureton	NRC
Melody Rodriguez	NEI	Tony Nakanishi	NRC
Travis Bennett	Southern Nuclear	Kate Lenning	NRC
Roy Linthicum	Constellation Nuclear	Julie Winslow	NRC
David Feitl	NEI	Chris Cauffman	NRC
Cecil Fletcher II	Duke Energy	Jared Justice	NRC
Richard Mogavero	NEI	Nicole Fields	NRC
Melisa Krick	Talen Energy	Andrew Mihalik	NRC
Jim Andersen	Unknown	Amar Patel	NRC
Matthew Marzano	Unknown	Jeff Bream	NRC
Shayne Curtis	Xcel Energy	Josh Havertape	NRC
Carrie Seipp	Xcel Energy	Paul Rades	NRC
Beth Lang	Westinghouse	John Hanna	NRC

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

Name	Organization¹	Name	Organization
Kate Atwater	Westinghouse	John Hughey	NRC
B. Cizin	Unknown	Sunil Weerakkody	NRC
Kelly Callais	Unknown	Avinash Jaigobind	NRC
Carlos Sisco	Winston & Strawn	Manuel Crespo	NRC
Rebeca Saiz Utanda	Unknown	Pat Finney	NRC
Wendy Brost	Unknown	John O'Donnell	NRC
Katie Brown	Talen Energy	Michele Kichline	NRC
James Orr	Constellation Nuclear	Ty Ospino	NRC
Alicia Davis	Unknown	Jason Eargle	NRC
Jim Slider	NEI	Paul Laflamme	NRC
Steven Dolley	S&P Global Platts	Rob Krsek	NRC
Ashley Rickey	Constellation Nuclear	Lundy Pressley	NRC
Wade Scott	Constellation Nuclear	Brian Kemker	NRC
Ryan Stiltner	Constellation Nuclear	Lauren Bryson	NRC
Drew Richards	STP	Tom Eck	NRC
Mark DeWire	Unknown	Virgel Furr	NRC
Stephen Yodersmith	Unknown	Noah Bolling	NRC
Isaac Mulhern	Unknown	Raju Patel	NRC
		Robert Williams	NRC
		Jonathan Fiske	NRC
		Adam Lee	NRC
		Musab Abuhamdan	NRC
		Catherine Thompson	NRC
		Zackery Helgert	NRC
		William Schaup	NRC