



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

January 17, 2024

MEMORANDUM TO: Thomas Hartman, Acting Chief  
Reactor Inspection Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

FROM: Amar Patel, Reactor Operations Engineer  
Reactor Inspection Branch  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

A handwritten signature in black ink, appearing to read "Hollcraft", written over a horizontal line.

Signed by Hollcraft, Z  
on 01/17/24

SUBJECT: SUMMARY OF DECEMBER 15, 2023, PUBLIC MEETING TO DISCUSS  
CORPORATE LEVEL INSPECTIONS

On December 15<sup>th</sup>, 2023, the Office of Nuclear Reactor Regulation staff hosted a webinar Observation meeting (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23333A048), with representatives from the Nuclear Energy Institute (NEI), various licensee staff, and members of the public to discuss corporate level inspections.

During the meeting, the NRC staff presented discussion areas for the industry to consider when proposing consolidation of inspections at a corporate location. NRC staff provided the discussion areas such as what NRC inspections should be considered for corporate inspections, how would any issues found be adjudicated, how would those corporate level inspections fit in the ROP, how would corporate inspection increase effectiveness and efficiencies, what could be some unintended consequences, and what other ROP changes should we consider.

NRC facilitated the meeting, allowing industry to share their ideas in the specific discussion areas. Representatives from NEI, NextERA, Constellation, TVA and Duke presented their viewpoint specific to the discussion areas. Most common, the industry representatives would like increased inspection flexibility such as common level program/procedure inspections should not be duplicated from site to site that implement the common level program/procedures. The industry mentioned few inspections that can be partly conducted at the corporate facilities such as commercial grade dedication, age related degradation, comprehensive engineering team inspection, fire team inspections, cyber security team inspections, 50.69 inspections, and steam generator tube inspections. Industry representatives also mentioned a module approach such as the first site would get the whole inspection and subsequent sites within that fleet would get self-assessments based on the results of the first site inspection. Another approach that was mentioned that the NRC should conduct one aspect of the inspection at the corporate facility and then conduct the walkdowns at the specific sites at another time. Representatives from the industry mentioned that any potential violations found at the corporate facility that the specific site that was inspected first should get the violation and any subsequent site would potentially get credit for entering the issue into their corrective action program and those violations maybe licensee identified. Industry also mentioned that any issues found at the corporate level, inherently would be addressed at all their sites and therefore the NRC could have a single

inspection report and document multiple dockets in that report. The industry also gave an example of an inspection being completed within 100 hours and that the first time an inspection is completed, 20 hours could be done at the corporate offices and 80 hours completed at the individual site. Any subsequent inspection completed at other facilities within that fleet should only get the 80 hours onsite inspection. The industry also mentioned that if inspections were consolidated then that would free up their staff to concentrate on improving safety instead of their time supporting NRC inspections. The industry also mentioned that some of their facilities cross regional boundaries and it could increase effectiveness of inspections such as team leaders from various regions may be able to gain consistencies by visiting the corporate facilities at the same time and share inspector information. The industry also mentioned that based on 20 years of ROP experience, maybe the NRC should evaluate those 20 years and have an opportunity to enhance the ROP.

The NRC staff presentation can be found at ADAMS Accession No. ML23332A720. The NRC staff allowed industry and the public to provide questions, comments and feedback on the corporate level inspections. NRC staff and industry conducted an open dialogue discussing the industry comments.

This meeting was a virtual webinar meeting. At designated points during the meeting, members of the public were invited to provide any comments on the presentations. There were no comments from the public during the meeting.

Enclosure:  
Lists of Attendees

CONTACT: Amar Patel, NRR/DRO  
610-337-5220

SUBJECT: SUMMARY OF DECEMBER 15, 2023, PUBLIC MEETING TO DISCUSS  
CORPORATE LEVEL INSPECTIONS DATED: JANUARY 17 2024

**DISTRUBTION:**

RidsNrrDroIrib Resource

APatel

DBolck

**ADAMS Accession Nos.: ML24004A161**

<b>OFFICE</b>	NRR/DRO/IRIB	NRR/DRO/IRIB
<b>NAME</b>	APatel	DBollock
<b>DATE</b>	1/3/2024	1/17/2024

**OFFICIAL AGENCY RECORD**

LIST OF ATTENDEES FOR THE DECEMBER 15, 2023, PUBLIC MEETING TO DISCUSS  
CORPORATE LEVEL INSPECTIONS

<b>Name</b>	<b>Organization</b>	<b>Name</b>	<b>Organization</b>
Thomas Hartman	NRC	Tim Riti	NEI
Amar Patel	NRC	Steve Catron	NextERA
Douglas Bollock	NRC	Cecil Fletcher	Duke
Phil McKenna	NRC	Christian Williams	Constellation
Antonios Zoulis	NRC	Russell Thompson	TVA
Chris Cauffman	NRC	Tony Brown	NEI
Don Johnson	NRC	Kevin Ellis	Duke
Greg Warnick	NRC	Stephenie Pyle	
Nick Taylor	NRC	Tracy Orf	
Ken Kolaczyk	NRC	Harry Balian	PSEG
Jeff Bream	NRC	Timothy Falkiewicz	NextERA
James Baptist	NRC	Enrique Melendez	
Theo Fanelli	NRC	Charlene Chotalal	Dominion
Scott Sullivan	NRC	Larry Nicholson	Certrec
Mel Gray	NRC	Kenneth Mack	NextERA
Joshua Green	NextERA	Suzanne Loyd	Constellation
Deann Raleigh	Curtis Wright	Mary Miller	Dominion
Jeff Connors	Xcel Energy	Brian Derrico	NextERA
James Orr	Constellation	Jeanne Johnston	Southern
Kimberly Hulvey	TVA	Jim Anderson	Excel Services
Camille Zozula	Westinghouse	Andrew Mauer	NEI
Brian Mount	Dominion		

Enclosure