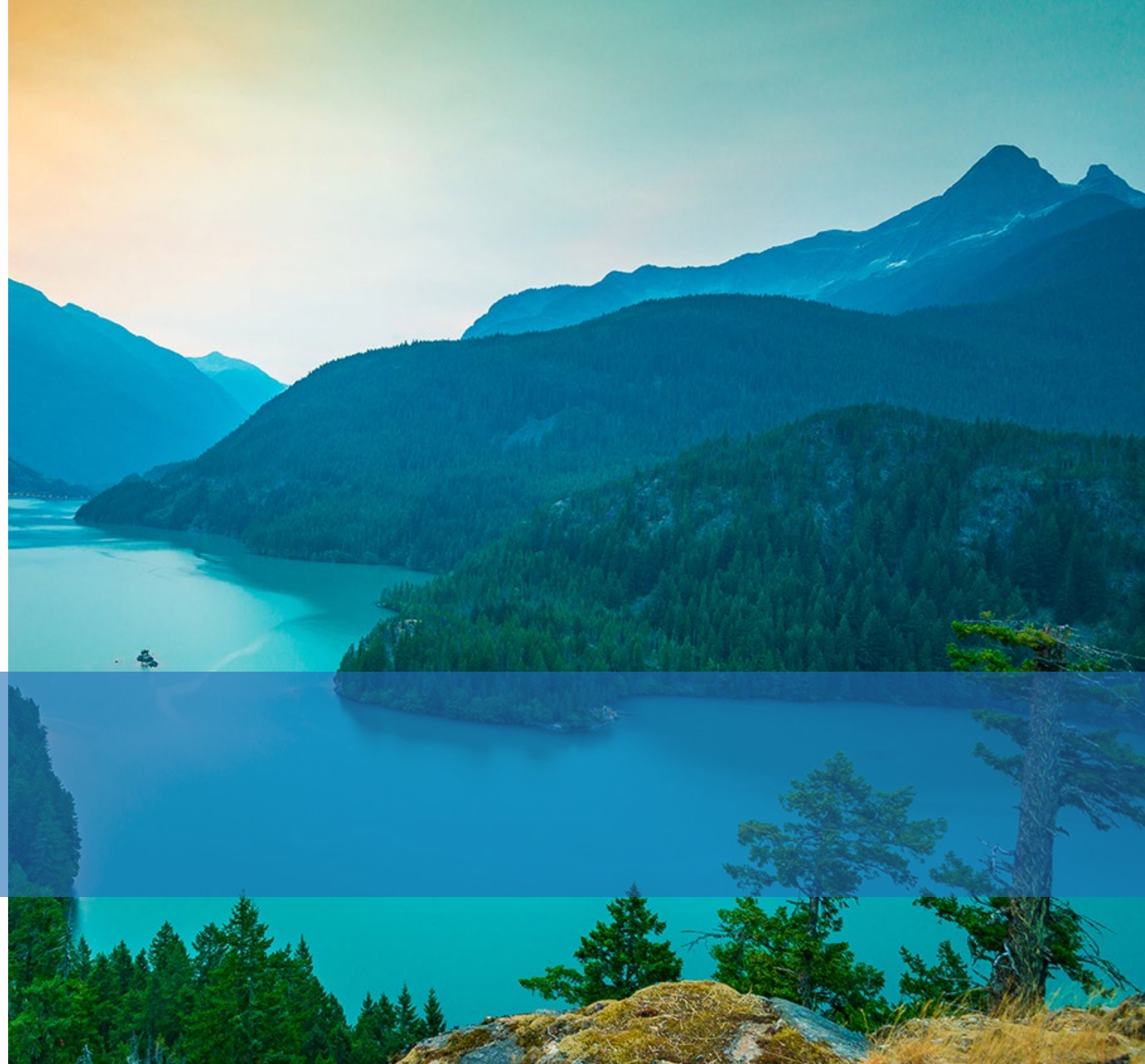
# NEI 99-02, Rev. 8

## ROP Public Meeting

**Sept 25, 2024**

NUCLEAR ENERGY INSTITUTE



# Purpose

- Provide update on NEI 99-02 rev. 8

# Overview

## Since revision 7 was issued in 2013

- Over 50 FAQs have been dispositioned*
- 1 White Paper approved, AP1000 (included in rev. 8)
- SECY-23-0010 approved to replace the ANS PI with ERFER PI (FAQ 22-01)

## More recently

- 2  NRC public workshops conducted
- 23 NRC staff review comments dispositioned (ML24074A472)

* The current list of approved FAQs can be found on the NRC website.

# Summary of Changes

- Replaced references to Consolidated Data Entry (CDE) with Industry Reporting and Information System (IRIS) throughout
- Incorporated definition of “concurrent failure”
- Additional clarity added to the Unplanned Scram with Complications Section
  - Added definition of “initial transient”
  - Updated criteria to account for AP1000 design differences
  - Updated BWR question for verifying rod position
  - Clarified use of SRVs for pressure control following the initial transient
  - Clarified conditions for meeting MFW availability

# Summary of Changes

- Add clarity to unplanned power changes when addressing unrelated issues during planned power reductions
- Added new plant specific FAQs
- Major reformatting of MSPI section including App. F & G
- Major reformatting/rewrite of EP section including retirement of ANS PI and addition of new ERFER PI*

* ERFER PI pilot reporting began 1Q2024.

# Summary of Changes

- Removed proposed examples of unplanned scrams and exceptions described in IE white paper
  - To be discussed later

# Next Steps

- Complete updates & submit NEI 99-02 rev. 8 to NRC for final review
- Implement NEI 99-02 rev. 8 (ECD fall 2024)

# Questions

# Initiating Events White Paper

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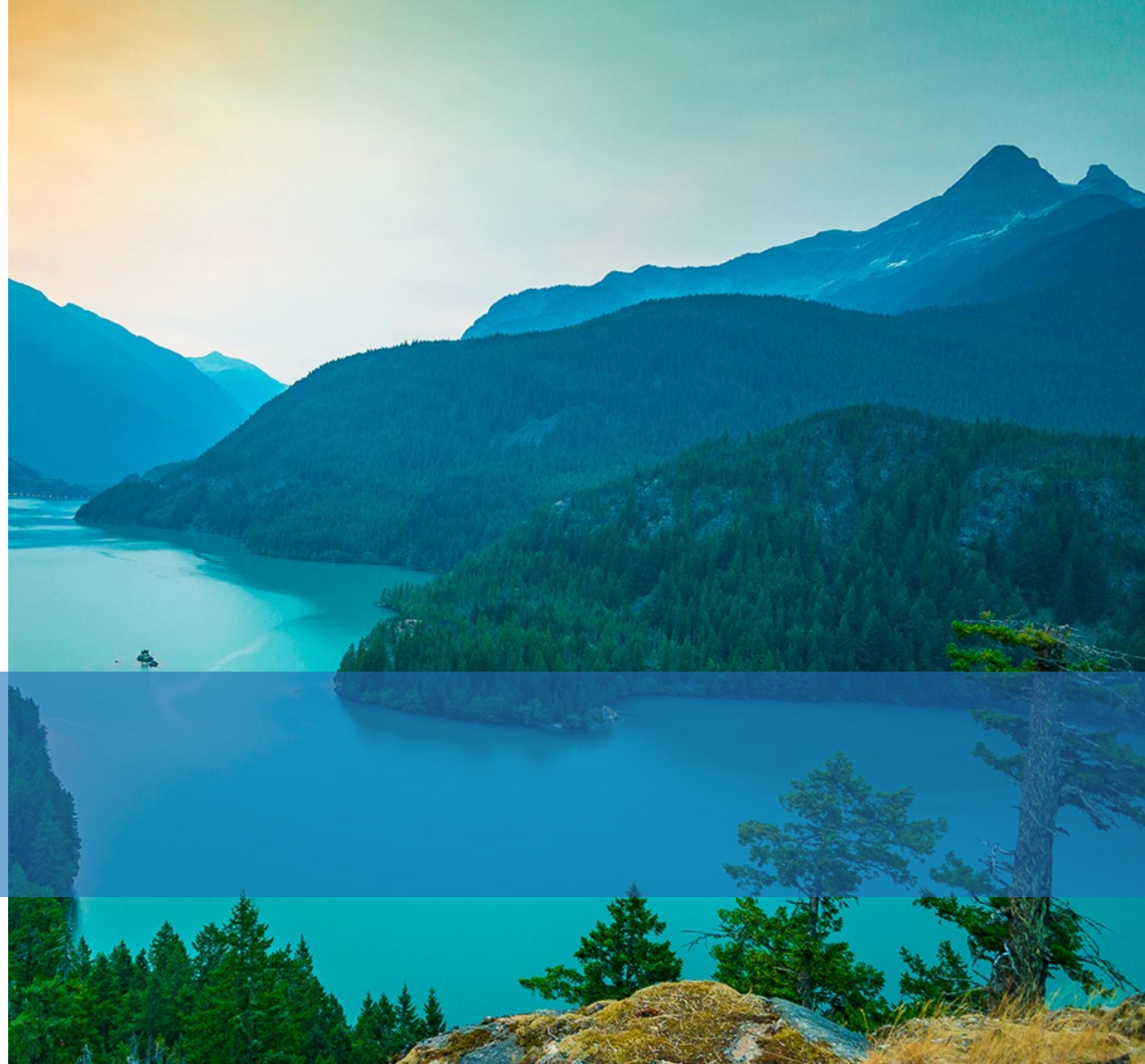

# Path Forward

- White paper submitted to NRC to provide recommended clarifications to NEI 99-02, unplanned scrams per 7000 critical hours PI. (ML24185A209)
- Discussed at NEI 99-02 public meeting on Aug 28th for consideration in rev. 8.
- Clarify when manual scrams are used as part of a normal reactor shutdown sequence.
  - After removing the main generator from the electrical grid to shutdown the reactor versus reaching manual or automatic scram criteria because of a transient/required action.
  - As part of main turbine post maintenance testing following major maintenance to address expected rubs/vibrations versus as a response to equipment failures.
- Examples pulled from NEI 99-02 draft rev. 8 based on NRC questions/comments discussed at the public meeting.

# Path Forward

- Subject of a future public meeting/workshops (late 4th quarter or early 1st quarter 2025) to discuss white paper and other examples after rev. 8 is issued.
- Potential outcomes provided alignment is reached.
  - Additional clarification and descriptions for unplanned scrams under the IE cornerstone section
  - New appendix similar to App. H, USwC Basis Document, that provides more details and supporting information/examples.
  - Improved guidance when exceptions should be pursued/considered based on certain criteria and situations that may be encountered.

# Questions