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**NUCLEAR REGULATORY COMMISSION**

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UNITED STATES NUCLEAR REGULATORY COMMISSION'S  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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721ST MEETING

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

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WEDNESDAY

DECEMBER 4, 2024

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The Advisory Committee met via Video/Teleconference, at 8:30 a.m. EST, Walter Kirchner, Chairman, presiding.

COMMITTEE MEMBERS:

WALTER L. KIRCHNER, Chairman

GREGORY H. HALNON, Vice Chairman

RONALD G. BALLINGER, Member

VICKI M. BIER, Member

VESNA B. DIMITRIJEVIC, Member

CRAIG D. HARRINGTON, Member

ROBERT P. MARTIN, Member

SCOTT P. PALMTAG, Member

THOMAS E. ROBERTS, Member

MATTHEW W. SUNSERI, Member

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DESIGNATED FEDERAL OFFICIAL:

CHRISTOPHER BROWN

ALSO PRESENT:

LARRY BURKHART

P-R-O-C-E-E-D-I-N-G-S

8:30 A.M.

CHAIR KIRCHNER: Okay. Good morning. The meeting will now come to order. This is the first day of the 721st meeting of the Advisory Committee on Reactor Safeguards, ACRS. I am Walt Kirchner, chair of the ACRS. ACRS members in attendance are Ron Ballinger, Vicki Bier, Greg Halnon, Bob Martin, Scott Palmtag, Matt Sunseri. And members attending virtually are Vesna Dimitrijevic, Craig Harrington, and Thomas Roberts.

If I have missed anyone, please speak up. I think that's -- we have a quorum.

Christopher Brown of the ACRS staff is the Designated Federal Officer for this morning's closed meeting. No member conflicts of interest for identified for today's meeting. And as I noted, we have a quorum.

For this morning's topic on Material Reliability Program, a member, Craig Harrington, has recused himself due to a conflict of interest.

The ACRS was established by statute and is governed by the Federal Advisory Committee Act, or FACA. The NRC implements FACA in accordance with its regulations. Previous regulations and the committee's

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1 bylaws, the ACRS speaks only to its published letter  
2 reports. All member comments should therefore be  
3 regarded as only being the individual opinion of that  
4 member and not a committee position.

5 I want to note that information related to  
6 ACRS activities such as letters, rules for meetings,  
7 participation, and transcripts are located on the  
8 NRC's public website. It can be easily found by typing  
9 about us acrs in the search field on NRC's home page.

10 The ACRS, consistent with the agency's  
11 value of public transparency and regulation of nuclear  
12 facilities, provides opportunity for public input and  
13 comment during our proceedings. We have received no  
14 written statements or requests to make an oral  
15 statement from the public. However, written  
16 statements may still be forward to today's Designated  
17 Federal Officer. And we have also set aside time at  
18 the end of the meeting for public comments.

19 A transcript of the meeting is being kept  
20 and will be posted on our website. When addressing  
21 the committee, participants should first identify  
22 themselves and speak with sufficient clarity and  
23 volume so that they may be readily heard. If you're  
24 not speaking, please mute your computer on Teams. And  
25 if you are participating by phone, press \*6 to mute

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1 your phone, and \*5 to raise your hand on Teams.

2 The Teams chat feature will not be  
3 available for use during the meeting. For everyone in  
4 the room, please put all your electronic devices on  
5 silent mode and mute your laptop microphone and  
6 speakers. In addition, please keep sidebar  
7 discussions to a minimum since the ceiling microphones  
8 are live.

9 And then we often tell our presenters that  
10 the table microphones are unidirectional and you'll  
11 need to speak into the front of the microphone to be  
12 heard on line.

13 Finally, if you have any feedback for the  
14 ACRS about today's meeting, we encourage you to fill  
15 out the public meeting feedback form on the NRC's  
16 website.

17 Today, joining this meeting's morning  
18 session we will discuss the Material Reliability  
19 Program, Pressurized Water Reactor Internals  
20 Inspection, and Evaluation Guidelines RP-227,  
21 Revision 2.

22 Do members have any other additional  
23 comments? If not, then I am going to turn to Ron  
24 Ballinger, who is the chair of our Fuels, Materials,  
25 and Structures Subcommittee.

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1 Ron?

2 MEMBER BALLINGER: Thank you, Mr.  
3 Chairman. We had a subcommittee meeting on this topic  
4 in November and I forget which day, but it was a  
5 pretty extensive discussion. The Revision 2 of MRP-  
6 227, the major components of that are updated to  
7 include issues related to SLR, as well as issues  
8 related to plants that might want to actually load-  
9 follow. So those are the two main issues addressed in  
10 the guidelines. There are several appendices that  
11 allow for alternate paths forward for inspection, but  
12 through NEI 03-08, MRP-227 is effectively part of a  
13 plant's license, so they have to adhere to that and so  
14 this revision is pretty significant.

15 At the end of that discussion, we had  
16 decided that a letter was not needed. That was the  
17 consensus of the members there. One of the questions  
18 that did come up had to do with what happens if a  
19 plant is shut down and then at some point in the  
20 future, an owner or a new owner decides that they want  
21 to start the plant back up again. The comments were  
22 that MRP-227 would not fly and there would have to be  
23 a revision of that document in order for that to work.  
24 So that was a comment.

25 So that was pretty much the discussion and

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1 I was provided a summary of that discussion for the  
2 members. And so that was the extent of everything.  
3 Thank you.

4 CHAIR KIRCHNER: Thank you, Ron. Members,  
5 any comments?

6 MEMBER SUNSERI: Yes, I've got a few. Are  
7 we going to discuss how many are in the P & P? We'll  
8 go over it in detail because I had a couple of  
9 comments on it.

10 CHAIR KIRCHNER: Could you share them now?  
11 Actually, that would probably be appropriate.

12 MEMBER SUNSERI: So I had -- I mean  
13 they're minor. It's just confusing language. Have to  
14 have permanently shutdown, but wish to restart. I  
15 think the official -- not the official, but I think  
16 the common language is cease operation. Plants that  
17 cease operation or wish to continue. There's a  
18 nuance, but --

19 MEMBER BALLINGER: The last paragraph by  
20 the way, Larry sent it over to staff for their  
21 comments and edits. So the last paragraph reflects  
22 their comments and their suggestions.

23 MEMBER SUNSERI: Okay, so that's the way  
24 the want it.

25 MEMBER BALLINGER: Well, I mean we can put

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1 --

2 MEMBER SUNSERI: I don't care. I was just  
3 bringing it up because it seems -- it just doesn't  
4 seem good English to say they were permanently shut  
5 down, but they're going to restart. There's no such  
6 thing as permanently shut down.

7 VICE CHAIR HALNON: And I agree with that.  
8 But the language that has either ceased operation and  
9 entered decommissioning or has entered decommissioning  
10 because we're really not talking about plants that  
11 shut down for performance issues or something like  
12 that. We're talking about these plants that shut down  
13 for economic reasons.

14 MEMBER BALLINGER: Well, I don't know what  
15 the appropriateness of what we're doing is, we're in  
16 the middle of -- we're not letter writing, but I would  
17 be happy -- I don't know what I'd be happy to do on  
18 this.

19 VICE CHAIR HALNON: We can adjust the  
20 words later, but I think from a preciseness  
21 perspective to reflect the discussion that we had at  
22 the time, we were talking about the plants that have  
23 entered decommissioning.

24 MEMBER BALLINGER: Is that right?

25 VICE CHAIR HALNON: Yes. If we can get

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1 some more precise --

2 MEMBER BALLINGER: I'm happy, if it's  
3 appropriate for people to send me comments. I sent by  
4 email this document for everybody and we've got plenty  
5 of time this week. I'm happy to produce a second  
6 revision.

7 MEMBER SUNSERI: These are good, nuanced  
8 comments just for clarity. I don't think it changes  
9 the intent of what you're providing.

10 The second comment I had is regarding a  
11 phrase in here just after that, plants that would need  
12 to justify the use of MRP-227 Part -- and here's the  
13 part I have a question about, license renewal of  
14 subsequent license renewal. That's a phrase that  
15 doesn't make any sense. It doesn't resonate with me.  
16 I don't know what that means. License renewal of  
17 subsequent license renewal.

18 MEMBER BALLINGER: You know what, I just  
19 accepted changes and it may be that we've got to fix  
20 that.

21 MEMBER BIER: I'm guessing that means  
22 license renewal for subsequent license renewal.

23 MEMBER BALLINGER: Yes, yes, yes.

24 VICE CHAIR HALNON: I think it's talking  
25 about the period of extended operations beyond --

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1 MEMBER BALLINGER: Okay.

2 MEMBER SUNSERI: Really, at the end of the  
3 day, all this is is a revision of AMP.

4 MEMBER BALLINGER: Yes, the AMP is derived  
5 from this.

6 VICE CHAIR HALNON: It just needs to say  
7 for periods of extended operations. Period. That  
8 covers license renewal periods and subsequent --

9 MEMBER SUNSERI: Yes, my hang up on that  
10 wasn't so much that, but it was NRC has changed their  
11 process for reissuing the license for a plant that has  
12 declared ceased operation and entering  
13 decommissioning. So it seemed like you're --

14 MEMBER BALLINGER: Is that written  
15 somewhere?

16 MEMBER SUNSERI: It's in the Federal  
17 Register.

18 MEMBER BALLINGER: Oh.

19 CHAIR KIRCHNER: Okay, those are good  
20 comments. Thank you. Yes, and we can work with that.  
21 Then, this afternoon for P&P, and make an adjustment  
22 to the summary that will be entered into the record.  
23 Further discussion?

24 Okay, thank you again, Ron. So with that,  
25 we are actually finished with our morning business and

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1 for the court reporter, we will not need your services  
2 again during the course of this meeting.

3 MR. BURKHART: Correct. This is Larry  
4 Burkhart. We should take public comment.

5 CHAIR KIRCHNER: Okay, with that, we'll  
6 take public comments on this subject of MRP-227 or any  
7 other comments.

8 Unmute your mic, identify yourself and  
9 state your affiliation, if appropriate, and make your  
10 comment.

11 Okay, hearing none, then we are finished  
12 with the services of the court reporter. Thank you  
13 very much. And we are going to then go into recess  
14 until this afternoon and start at 2 o'clock Eastern  
15 Time with our planning and procedures session, 2 p.m.  
16 Thank you. We are in recess.

17 (Whereupon, the above-entitled matter went  
18 off the record at 8:43 a.m.)

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