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REACTOR SAFEGUARDS

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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732ND MEETING

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

+ + + + +

THURSDAY

FEBRUARY 5, 2026

+ + + + +

The Advisory Committee met at Two White
Flint North, 11545 Rockville Pike, Rockville,
Maryland, and via videoconference, at 8:30 a.m. EST,
Gregory H. Halnon, Chair, presiding.

COMMITTEE MEMBERS:

- GREGORY H. HALNON, Chair
- DAVID A. PETTI, Vice Chair
- CRAIG D. HARRINGTON
- ANNIE M. KAMMERER
- WALTER L. KIRCHNER
- ROBERT P. MARTIN
- SCOTT P. PALMTAG
- THOMAS E. ROBERTS
- MATTHEW W. SUNSERI

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LARRY BURKHART

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

8:30 a.m.

CHAIR HALNON: Good morning, this meeting will now come to order. This is the first day of the 732nd Meeting of the Advisory Committee on Reactor Safeguards.

I am Greg Halnon, Chairman of the ACRS. ACRS members in attendance in person are Craig Harrington, Annie Kammerer, Robert Martin, Scott Palmtag, Dave Petti, and Tom Roberts.

Walt Kirchner and Matt Sunseri are participating virtually via Teams. If I've missed anybody, I think that's the entire committee, so I don't expect anyone to speak up, but just in case, speak up.

Larry Burkhart of the ACRS staff is our designated federal officer. We also refer to that as a DFO. And, he will be today, the DFO for today's full committee meeting.

We do have a quorum.

The ACRS was established by the Atomic Energy Act, and is governed by the Federal Advisory Committee Act.

Under the Atomic Energy Act, ACRS must advise the Nuclear Regulatory Commission on hazards of

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1 proposed and existing reactor facilities, and the
2 adequacy of proposed safety standards.

3 Following Executive Order 14300, the
4 Committee has narrowed its focus to those activities
5 necessary to fulfil its statutory obligations.

6 As a result, ACRS is prioritizing the
7 review and reporting of new reactor facilities and
8 proposed safety standards, with particular attention
9 to issues that are unique, novel, and noteworthy.

10 The Committee will consider other nuclear
11 safety matters at the direction of the Commission.

12 Please note that the ACRS speaks only
13 through its published letter reports. All member
14 comments should be regarded as only the individual
15 opinion of that member; not a Committee position.

16 Information about the ACRS activities such
17 as letters, meeting rules, and transcript are on the
18 NRC public website and can be found by searching,
19 about us ACRS, on the NRC's home page.

20 The ACRS provides an opportunity for
21 public input and comment on relevant, technical issues
22 during our proceedings.

23 For this full committee meeting, we have
24 received no written statements, or requests for verbal
25 comment. Written statements may still be forwarded to

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1 today's designated federal officer.

2 We have set aside some time at the end of
3 our meeting, the deliberations portion, for a public
4 verbal comment on the Committee technical reports.

5 A transcript of today's meeting is being
6 kept and will be posted on our website. When
7 addressing the Committee, participants should first
8 identify themselves, speak with sufficient clarity and
9 volume so that they may be readily heard.

10 If you are not speaking, please mute your
11 computer on Teams. If you are participating by phone,
12 press *6 to mute your phone, and *5 to raise your hand
13 on Teams.

14 The Teams chat feature is for only
15 communicating IT issues or brief meeting logistics.
16 Please do not use it for comments or questions on the
17 topics under the Committee discussion.

18 For everyone in the room, please put all
19 your electronic devices in the silent mode, and mute
20 your laptop microphone and speakers.

21 In addition, please keep sidebar
22 discussions in the room to a minimum since the ceiling
23 microphones are live.

24 For the presenters, your table microphones
25 are unidirectional and you'll need to speak into the

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1 front of the microphone to be heard online.

2 Finally, if you have any feedback for the
3 ACRS about today's meetings, please fill out the
4 public meeting feedback form on the NRC website.

5 Today we will be able to discuss and
6 develop a letter report on lessons learned and good
7 practices, from the previous and more recent
8 application reviews.

9 We, as a Committee, strive to continuously
10 refine our approach to these complex reviews by
11 applying these lessons to the ongoing and future
12 reviews, to gain not only proficiency, but to ensure
13 a cross-cutting and thorough technical review.

14 After this is completed, then we'll move
15 into our procedures and planning session, which is
16 more administrative.

17 So, before I go on further, I wanted to do
18 a mic check with Walt and Matt. Could both, are you
19 able to hear us okay, Matt and Walt?

20 MEMBER KIRCHNER: Yes.

21 MEMBER SUNSERI: Yes, this is Matt.

22 CHAIR HALNON: Okay, and Matt, I heard
23 your microphone, you're good?

24 MEMBER SUNSERI: Yes, Greg, I can hear you
25 all fine. Can you hear me okay?

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1 CHAIR HALNON: Yes, yes. I just wanted to
2 make sure that we didn't get into a distraction if
3 your mics didn't work, so appreciate that.

4 MEMBER SUNSERI: Yes, can I say one thing
5 before if you're done with your opening?

6 CHAIR HALNON: Yes, go ahead.

7 MEMBER SUNSERI: Maybe you've got
8 something planned here, but I'd just like to
9 acknowledge this is the first full committee meeting
10 since the election of our new officers.

11 And I want to, I think the Committee
12 appreciates your commitment to support us. It's not
13 an easy job; it's a handful, and you don't get paid
14 anything extra.

15 So thank you for this service you're about
16 to provide us in the coming years. Thank you.

17 CHAIR HALNON: Thank you, Matt, I think
18 you set a high bar for us, so appreciate that --

19 (Laughter.)

20 CHAIR HALNON: -- that acknowledgment.

21 Anyone else got anything else to discuss?

22 MEMBER KIRCHNER: I'll go ahead and check
23 my mic, Greg, and second Matt's comments. Thank you.

24 CHAIR HALNON: Thank you Walt, and we do
25 appreciate both of your services over the last 4

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1 years. Because Matt, you've been an officer several
2 times, so appreciate that.

3 And Walt, you made it easy for me. You
4 set a good glide path for us.

5 Anybody else want to get something off
6 their chest?

7 (Laughter.)

8 CHAIR HALNON: Okay, thank you. At this
9 time, I'm going to turn the meeting over to Dave
10 Petti.

11 Dave petti was our lead member on the
12 lessons learned, and self-assessment process. And, he
13 will lead us through this next session, so Dave?

14 VICE CHAIR PETTI: Okay, so before we get
15 into the letter, I thought it would be useful to have
16 a little bit of discussion from members about what
17 were their important takeaways, lessons learned from
18 the reviews they've participated in going back to
19 NuScale and Kairos.

20 One of the things that in the letter the
21 way I've drafted it, is I've not, I've organized the
22 thoughts in topic areas. But I've not purposely
23 prioritized them, per se.

24 So that's something that I'd maybe like
25 some feedback is if you think that that, this is the

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1 most important in that sub-category. We might change
2 the order of something, and things like that.

3 So, I just opened it up. Maybe start with
4 Walt. Walt, what's your big takeaways as we look
5 back?

6 MEMBER KIRCHNER: Thank you, Dave, I had
7 to find my microphone. I think the important takeaway
8 is over the last several years, it goes back to the
9 NuScale DCA review.

10 But more recently, the focus on what we've
11 defined as the safety case. And the fundamental
12 safety functions and how the designs that we're
13 reviewing, accomplish those.

14 And that has been a framework if you will,
15 to focus our reviews even further; cut through the
16 extraneous material.

17 There's a lot of material that the staff
18 looks at in the course of a thorough and comprehensive
19 review of an application.

20 But for the committee, I think our highest
21 value is to provide timely advice to the Commission.
22 And the best way to do that is to continue to
23 concentrate on the, pardon the poor choice of words,
24 the core of the safety case that an applicant is
25 presenting, and the staff has reviewed.

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1 VICE CHAIR PETTI: Okay, no, I appreciate
2 it.

3 MEMBER KIRCHNER: Thanks, I agree with you
4 completely, that's but Matt, I'll go with the
5 external.

6 MEMBER SUNSERI: Yes, thanks, Dave. So,
7 I think what I appreciate or I think is from a lessons
8 learned perspective, is how we continue to evolve our
9 internal process to move away from so much dependence
10 on the staff in the final SE.

11 Because as you recall, we started out with
12 a draft SE with open items. And then, we had a SE.
13 Then we switched to SE with just closed items.

14 And now we're kind of being able to look
15 at these applications somewhat independent of the
16 safety evaluation.

17 Clearly the staff is a stakeholder, much
18 as the applicant is stakeholders. And we need
19 interface and interact, and talk to those folks.

20 But the quality of our letters to me, seem
21 to be as good as they've ever been. And we're
22 spending a lot less time looking at SEs and draft SEs,
23 and things of that nature.

24 So I think that, and I think you got that
25 captured in your report.

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1 VICE CHAIR PETTI: No, I agree with that,
2 too. Good points. Tom?

3 MEMBER ROBERTS: Yes, having led the most
4 recent review that we had that was back in November,
5 I would certainly reinforce what both Walt and Matt
6 said in terms of the focus on what's unique, novel,
7 and noteworthy.

8 And something that a more formalized to
9 the committee during the interim review. And, we
10 jumped on that and as quickly as we could, given the
11 schedule, we identified what is unique, novel, and
12 noteworthy.

13 So in terms of lessons learned, early
14 engagement like we're having now with all these
15 projects to ensure that we have an open communication
16 among the committee, and then with the staff on what
17 we're saying is the focus areas, so that's something
18 we can do early. It helps focus what's coming later.

19 And the second final thing, what worked
20 well I thought with Natrium, was engaging with the
21 staff to understand what significant changes were
22 being made by the applicant during the process.

23 So just, we could have a fair amount of
24 effort end up being wasted when we have problems with
25 something the staff's already had problems with, and

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1 the applicant's in the process of either having
2 revised it, or already revised it, and we just don't
3 know.

4 Having that engagement with the staff, not
5 to duplicate their review, just to know what the hard
6 spots they're running into, and avoid us having to
7 spend a lot of time chasing down the same hard spots.

8 So I think all of that's captured in the
9 last letter I saw. Thank you.

10 VICE CHAIR PETTI: Scott?

11 MEMBER PALMTAG: Yes, being newer on the
12 committee, I don't really have much to compare to how
13 it was previously done.

14 But just watching what we've done,
15 especially the new Natrium stuff, I thought the review
16 with Tom went really well.

17 Just to reiterate on what Walt said is the
18 focus on the safety case, and fundamental safety
19 features.

20 My feeling is we're not here to check the
21 staff, or duplicate what the staff did. We have to
22 add value, and I think our value has kind of taken a
23 holistic view of what's going on, and kind of looking
24 at the safety case independently.

25 Looking at the whole picture, not just

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1 whether all the boxes are checked.

2 CHAIR HALNON: Thanks.

3 MEMBER MARTIN: I think I'll begin with
4 earlier, your acknowledgment in the draft letter about
5 what appears to us that applicants will be pushing
6 much of the hard work to the OL.

7 And so, I took the opportunity the last
8 couple of months since we've brought up the lessons
9 learned, to coalesce a number of thoughts that I've
10 had going back from when I started.

11 There's those that were on then, recall
12 that I pushed early this idea this hazards working
13 group.

14 And, we had a great meeting with Bill
15 Reckley, and I think it was Michelle Hart, and anyway,
16 senior experienced staff or retirees in the case of
17 Bill.

18 And, we followed that up with another
19 meeting on cliff edge, which is getting not
20 necessarily under the umbrella of hazards.

21 But as we try to understand the safety
22 case, the safety case particularly related to the risk
23 informed framework, and how that of course into the
24 Part 50 rule, there are definitely, there's definitely
25 work to do to create a common understanding about

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1 expectations from the staff's review standpoint. And
2 of course, our own.

3 Because again, one thing to have a Reg
4 Guide out there. And, it's another thing to actually
5 see it applied.

6 CPA is still very early in the process.
7 It's inherently going to have omissions that we would
8 rather not see, or see more completeness, but that's
9 not the process that is Part 50.

10 But to save time when we make the
11 statement like we perceive that the applicants are
12 pushing more to, to the OL stage, you want to make
13 sure that there is an understanding of expectations
14 going into that phase, before you meet them at the
15 end.

16 Because we don't want a situation where
17 oh, by the way, 18 months for review has gone by and
18 we see something on the screen that just doesn't
19 connect to the ultimate goal of getting their
20 operating license.

21 So, in trying to coalesce these thoughts
22 of hazards analysis and cliff edge effects, and the
23 application of NEI 18-04, I drafted a tome, 80+ pages
24 now.

25 Handed it off to a few people to get some

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1 feedback. It has basically three elements, three main
2 critiques.

3 One addressing really more standardization
4 with regard to the really establishing requirements,
5 which is related to hazards analysis, which of course
6 you've heard me say on many occasions.

7 And then, bring in the experience that
8 I've had and of course others have had on Pele, with
9 applying the DOE process.

10 Of course, there's other activities out
11 there that maybe might want to coalesce some DOE and
12 NRC alignment, so there may be an opportunity there.

13 The second area that I address, is the
14 cliff edge question. I did notice that Dave in your
15 letter, you kind of acknowledged somewhere in there
16 about expanded figures of merit.

17 And kind of gets into this, this question
18 of how do you explore that space? So the space is
19 really a beyond design basis space.

20 And, in the light water experience, that
21 gets characterized fairly well. Whether the industry
22 and ourselves want to acknowledge it, for these light
23 waters in Part 50 and Part 52, there are beyond design
24 basis accidents you have to look at.

25 Or, you could call them design extension

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1 events as the internationals do. But even things like
2 LOCA or ATWS, or hydrogen combustion, these are not
3 design basis events. These are beyond design basis
4 events.

5 And so, in moving towards a risk informed
6 process, what are those events for these new reactors?
7 And if you are going to follow the commissioners'
8 policy on advance reactors that you're going to be as
9 good or better than the light water reactors, is there
10 an expectation of an equivalence as far as the work
11 that has traditionally been done in that domain?

12 So, at the high level, there is the
13 question of how do you go about cliff edge? I think
14 one thing that's always annoyed me is that the Reg
15 Guide, and I don't know if it's 1.233 or Tom you might
16 correct me, where it says you need to show that there
17 are no cliff edge.

18 It's a -- you're proving a negative. It's
19 the language that's in the Reg Guide, to show that
20 there are no cliff edges, something like that.

21 And, it's always annoyed me that the
22 language is in there like that. Because you can't
23 really prove a negative in the same way. You have to
24 do the work.

25 The second --

1 (Simultaneous speaking.)

2 VICE CHAIR PETTI: I know the staff
3 concluded the MSTGI has been proven. Is that 19.93,
4 but I can read the --

5 MEMBER MARTIN: And fine, but it's an
6 exercise on how you --

7 VICE CHAIR PETTI: Well, it is --

8 MEMBER MARTIN: It's not to give you know,
9 it's and there's always a cliff edge, right? I mean
10 there's --

11 VICE CHAIR PETTI: The question is at what
12 probability?

13 MEMBER MARTIN: And, well, and how do you
14 make the box? So that's the other, that's, yes,
15 Appendix B is that creating the box.

16 So, in light water reactor, these were an
17 advanced reactors, we have something called the beyond
18 design basis or severe accident entry point. So a lot
19 of plants, a lot of designs, will quantify or
20 characterize that entry point.

21 We need to see what these applicants think
22 is the entry point. And, I think that gets into this
23 point about other figures of merit, you know, they
24 need to protect themselves from getting into this
25 space. We need to know what that entry point is.

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1 And, I think that gets into the mechanics
2 of cliff edge effects. And so, I'm implying here that
3 we need like a Reg Guide on hazards analysis; a Reg
4 Guide on how to do cliff edge effects.

5 And then, the Appendix C that I've
6 drafted, is what I think is again an omission with
7 regard to the application of NEI 18-04.

8 It is if you read it, it is 95 percent
9 level one type activities. There is a section in
10 there that talks about identifying overall plant risk
11 metrics.

12 It's kind of like the level 2/level 3,
13 Section 3.3.5. No one has said a word about
14 establishing risk metrics in relationship to that
15 section.

16 So, that might be an OL thing to do, and
17 we'll see it. I'm not sure, nor do I see a level 2 --

18 (Simultaneous speaking.)

19 VICE CHAIR PETTI: -- talking about cancer
20 effect? Latent cancers and --

21 MEMBER MARTIN: Not that far.

22 VICE CHAIR PETTI: -- CDFs?

23 MEMBER MARTIN: Well, that could be
24 implied by that section. But it's mostly focused on
25 level 2-like things.

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1 So, you know of course the difficulty is
2 these plants don't necessarily have a core damage
3 frequency.

4 And so, what it acknowledges in that
5 section is that you can't find, it was encouraging
6 applicants to identify what might be equivalent.

7 Ultimately, it comes down to some kind of
8 consequence. So, in my write-up I refer to a
9 contrasting something called event sequence families,
10 which is in NEI 18-04, as a causal family of events,
11 right? LOCAs and loss of heat sinks, and you can go
12 on and on.

13 To something that's more focused on the
14 consequence, just like you do with the end of level 1
15 identifying core damage frequency. It's a
16 consequence, a frequency.

17 Same thing with other plants, just
18 focusing say on a band of say, dose consequence.

19 CHAIR HALNON: Bob, I, you're getting into
20 some extremely detailed philosophy --

21 (Simultaneous speaking.)

22 MEMBER MARTIN: Well, it's --

23 CHAIR HALNON: -- so I'm just wondering --

24 MEMBER MARTIN: -- like, that's right.

25 Well, and so the lesson learned is that there is,

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1 there is omissions.

2 Now, I've taken my 80-page thing and I
3 gave you, I gave Dave two, two things, which relate to
4 really the, this space of beyond design basis.

5 I think what I --

6 (Simultaneous speaking.)

7 VICE CHAIR PETTI: I don't necessarily
8 agree with your characterization of for instance
9 Natrium. Because I can read the document. They had
10 a CD, right?

11 MEMBER MARTIN: They --

12 (Simultaneous speaking.)

13 VICE CHAIR PETTI: I was really surprised
14 that they went all that way.

15 MEMBER MARTIN: They did, they did. Well,
16 and they, well, they kind of, now we had some debate.
17 I mean Walt actually brought up the comment about is
18 the core disruption event just what they chose say one
19 fuel rod failure, or is it I guess as IAEA I think had
20 concluded in their, one of their safety guides on
21 LMFBRs, is it the whole core?

22 They went with, used risk arguments to
23 narrow it down to, and I will admit it was a pretty
24 good story.

25 But again --

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1 (Simultaneous speaking.)

2 CHAIR HALNON: I know, but they were, they
3 were long before you were here with Part 53
4 discussions about whether you could actually calculate
5 those metrics for these designs, because you can't get
6 to those.

7 The damage is the same, you can't get to
8 the equivalent damage dates.

9 MEMBER MARTIN: Right.

10 VICE CHAIR PETTI: The fact that they
11 actually did it said to me, I mean it would be
12 interesting to really understand what it was.

13 And, I'm sure the staff is going to get
14 into it because I'm sure the staff is --

15 (Simultaneous speaking.)

16 MEMBER MARTIN: Well --

17 VICE CHAIR PETTI: -- at the OL stage.

18 MEMBER MARTIN: Well, the title of what I
19 titled this thing was, fragmentation of residual risk.
20 And that's kind of the broader concern, is that the
21 methods when you get out there, encourage basically a
22 divide and conquer approach in a range of where
23 epistemic uncertainty is much, much larger than the
24 aleatory uncertainties that basically has been used to
25 populate PRA models.

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1 And so, my concern is that they're going
2 through individually and knocking out events when in
3 fact, all those events could be gathered together
4 under a particular consequence.

5 Whether it's a core damage frequency or
6 some other --

7 VICE CHAIR PETTI: But I think
8 mathematically, you can prove that's not a problem.

9 MEMBER MARTIN: No, well so --

10 (Simultaneous speaking.)

11 VICE CHAIR PETTI: If in fact, I mean
12 again, it's two different arguments. If you just have
13 one or two lines of defense, and you're going to make
14 your argument or probability because you think you've
15 got a really good, then I'd buy your argument.

16 But when you have three or four or more
17 lines of defense, the probability is so low that the
18 number of sequences you'd have to have to get it into
19 a spot where you have to worry about, is --

20 (Simultaneous speaking.)

21 MEMBER MARTIN: My point is they've got to
22 do that work. Not that it's not bad or anything, it's
23 they just need to show the work.

24 And, I guess my background in --

25 (Simultaneous speaking.)

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1 CHAIR HALNON: That's the lesson is they,
2 you want to see the work.

3 MEMBER MARTIN: I want to see the work and
4 transparency of that.

5 CHAIR HALNON: You wrote a paper, a draft.
6 Not all of us have seen it. It's personal work of
7 yours, so on your personal time.

8 MEMBER MARTIN: Yes.

9 CHAIR HALNON: We're not going to
10 adjudicate it in this meeting, and/or try to convince
11 one side or there other whether or not the arguments
12 will. Because some of us are flying blind.

13 MEMBER MARTIN: Of course.

14 CHAIR HALNON: And, you haven't submitted
15 anything and it's not even, it's not even a work in
16 progress, I guess.

17 So let's stick to lessons learned if it is
18 you'd like to see that work, then that's the lesson
19 learned.

20 MEMBER MARTIN: Exactly. And that's what
21 mostly this is. I want to see the work of the --

22 (Simultaneous speaking.)

23 CHAIR HALNON: -- referring back to a
24 paper that not everyone has seen.

25 MEMBER MARTIN: -- with the cliff edge

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1 effects, and the work with overall plant risk factors.

2 CHAIR HALNON: Okay.

3 MEMBER MARTIN: So, there would be three
4 items.

5 VICE CHAIR PETTI: You know what the
6 problem is, right? The PRA is not on the docket.

7 MEMBER MARTIN: And so, that is a problem.

8 VICE CHAIR PETTI: The test that's going
9 to be done because they don't want to put, I mean it's
10 a massive amount to put on the --

11 (Simultaneous speaking.)

12 MEMBER MARTIN: But see if you have a --

13 VICE CHAIR PETTI: So it will be done by
14 audit. It will be done by audit by the staff.

15 MEMBER MARTIN: Right, and so make the
16 safety case that's fundamentally based on the PRA, it
17 needs to be more visible. Particularly to us.

18 VICE CHAIR PETTI: That's not the -- yes,
19 okay, you can do it verbally, you can, you know. But
20 the guidance from the staff is you don't have to put
21 it on the docket. You have to put a summary, right?

22 MEMBER MARTIN: The PRA that was used in
23 Part 52 as a verification activity to demonstrate the
24 deterministic decisions are appropriate.

25 Now we're well we've flipped the script.

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1 Now Part 50 is still a little funny, right, where
2 they've integrated it. And Part 50 really is still a,
3 it's supposed to be a deterministic type thing.

4 Now Part 53 might be different. But I
5 would just say and yes, I'll acknowledge CPA is early
6 and some of these things would naturally be done
7 later.

8 But a lot of new people out there, and I
9 just, I think it's an opportunity to communicate that
10 we see these omissions at CPA, and that the rigor
11 associated with the three things I've mentioned,
12 really needs to be there. And, they should be
13 sensitive to it.

14 CHAIR HALNON: Again, that's a Bob
15 position, opinion, it's not a committee position
16 unless we --

17 MEMBER MARTIN: But you have asked for and
18 I put a lot of work into it.

19 CHAIR HALNON: But I didn't necessarily
20 want to get into the level of detail that you're
21 getting into, relative to individual attributes of a
22 PRA, and hazard analysis.

23 I get your lessons learned, they're in
24 there somewhere and I think you just summarized them
25 well.

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1 PARTICIPANT: Right.

2 MEMBER MARTIN: Now obviously going
3 forward is that at some point, I think we need to talk
4 to the staff like we did with cliff edge, and hazards.

5 Maybe early summer might be a good
6 timeframe where we can get something on the schedule.
7 Obviously, I've been gathering feedback. I got a
8 vision -- revision that largely influenced by Tom's
9 comments.

10 And then, I did have a PRA expert that I
11 worked with in Lynchburg, provide significant comment
12 on it, too.

13 CHAIR HALNON: Well, that adds another
14 dimension. Okay, we'll talk about how that paper can
15 get submitted to the agency.

16 MEMBER MARTIN: Well, to the rest of the
17 committee first, and --

18 CHAIR HALNON: Maybe not.

19 MEMBER MARTIN: Well, it's an email.

20 CHAIR HALNON: Sounds like it's a member
21 of the public type document at this point. So, we'll
22 talk later.

23 I'm not sure about the process. We'll get
24 our DFO and staff involved in how we do that to get
25 officially before the committee, or whoever needs to

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1 look at it.

2 But if you can talk about the cliff edge
3 effect, hazard --

4 (Simultaneous speaking.)

5 MEMBER MARTIN: Hazard --

6 CHAIR HALNON: -- cliff edge analysis --

7 MEMBER MARTIN: And then overall --

8 CHAIR HALNON: The current one is this
9 PRA, use of PRA in LMP, and for --

10 (Simultaneous speaking.)

11 MEMBER MARTIN: Or really just in this
12 space of overall.

13 CHAIR HALNON: Okay, so I think we got
14 that. Dave, from a lessons learned perspective, you
15 get, you understand where his head's at, right?

16 VICE CHAIR PETTI: I'm not sure I agree.

17 CHAIR HALNON: Well, that's not for to
18 agree. The committee will discuss --

19 (Simultaneous speaking.)

20 VICE CHAIR PETTI: Right.

21 CHAIR HALNON: -- that, but.

22 MEMBER ROBERTS: Let me offer this for
23 reflection. I think there is two discrete subjects
24 we're talking about here, and try to keep that in
25 mind.

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1 One is from a lessons learned perspective,
2 the defense line and the approach has the potential as
3 Dave said, to cover the kinds of completeness and
4 uncertainty questions that Bob's been raising.

5 And if you've got enough lines of defense,
6 it doesn't really matter if you haven't covered the
7 scenario, because you've got multiple ways of dealing
8 with that scenario.

9 So, that's not fully developed yet though.
10 We haven't reviewed the very comprehensive report from
11 GE or the BWRX-300 safety strategy.

12 And when we have that discussion, I think
13 we'll better refine what we think might be gaps there,
14 or whether it is complete.

15 It has the potential of being complete.
16 I think that's in Dave's draft letter.

17 The second one is follow up on the May
18 subcommittee meeting we had last year. I think that's
19 a completely separate issue that warrants some more
20 discussion.

21 I really don't see that as tied with the
22 lessons learned at this point. That's just kind of a
23 long-term process improvement if there's something
24 that we think we interested about the staff on, that's
25 something we can follow up on.

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1 Because maybe that takes some, give us
2 some thoughts away from that meeting. And it's
3 probably worthwhile for us at some point, to follow up
4 with what have they done with it.

5 So, I think there's two paths there, and
6 one is not really being covered today and the other
7 one is. I think it's in Dave's draft letter.

8 So it might be something worth reviewing.

9 MEMBER MARTIN: So, and there's a
10 temptation with a lessons learned activity, to focus
11 on what we've seen. And, I try to take an approach of
12 focusing on what we haven't seen.

13 And, knowing that it's early, but the
14 value of a letter like this is also to communicate
15 expectations moving forward. Not just to say we've
16 seen it, we generally like what we see.

17 But we need to say something more like
18 well, moving forward, and you did. You did
19 acknowledge they're pushing stuff to OL.

20 And maybe just put a little bit more in
21 there, and that's all I was offering a couple things
22 in this just overall plant risk space.

23 VICE CHAIR PETTI: My concern is we
24 haven't, well, we have seen a COL, but we've only seen
25 one. And mostly we've seen, we're seeing CPs. So, it

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1 is this mixed bag.

2 Yes, if we'd had a couple more OLs and
3 COLs, it would probably be a slightly different letter
4 than it is at this point.

5 CHAIR HALNON: Yes, right. I think the
6 lessons we're going to get from the OL is a compressed
7 timeframe and the overall amount of information will
8 be a whole different -- a fluid discussion.

9 VICE CHAIR PETTI: And I'd really like to
10 get to the letters. Craig, any?

11 MEMBER HARRINGTON: Just very briefly.
12 Like Scott, don't have a lot to compare to. Haven't
13 been on the committee long enough.

14 But a couple key things that one Walt
15 mentioned yesterday. Some of the TRs really more in
16 the TR space and I think at this point, the things
17 that I've seen have some designs with principle design
18 criteria where they've made changes from what's been
19 offered as examples in Reg Guides or others.

20 And really don't provide justification,
21 just here it is. And, those kinds of cases with no
22 justification frustrate me.

23 And the other thing that I'll highlight
24 and then turn it back to you, Dave, is we're in a very
25 dynamic environment now with a wide range of designs

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1 coming through.

2 Varying levels of detail. There's several
3 different licensing approaches that are available, and
4 are being taken.

5 We have all of the changes from schedule
6 pressures and other issues. So, we have to be very
7 flexible in what we see, and how we react to it. And
8 finding new ways to work with what we get.

9 I'll stop there.

10 CHAIR HALNON: Thanks. Do you have any?

11 PARTICIPANT: I think everything is good.

12 CHAIR HALNON: Okay.

13 VICE CHAIR PETTI: Annie, you've only been
14 here --

15 (Laughter.)

16 MEMBER KAMMERER: Yes, this is my second
17 meeting.

18 VICE CHAIR PETTI: Yes.

19 MEMBER KAMMERER: But I do have a lot of
20 experience with the ACRS from the staff side, over the
21 course of 7 years.

22 And I will say that something I see
23 already is that yes, it's a very dynamic environment.
24 It's a new environment.

25 But I feel like, of course I wasn't, I

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1 didn't have the opportunity to see behind the curtain
2 before.

3 But I do feel like that the way the ACRS
4 operates now from what I have -- know, is it's much
5 more structured in a lot of ways.

6 And I think that the effort that has gone
7 on to focus the activities, and how to think about
8 what the kind of questions that are going to be asked,
9 and the kinds of things that are going to be looked
10 at, is really different.

11 Now I was gone for 10 years and I have to
12 commend the Committee and the staff, for the level of
13 effort that's been put in to really bring, it's not
14 possible in this dynamic environment, a lot of clarity
15 on exactly what the Committee is here for. What it
16 does, and while still meeting the statutory
17 requirements of the Committee.

18 So, I just commend all for the efforts and
19 things like this lessons learned letter, I think is
20 really important for continuing to develop that
21 framework, and that process, and that understanding.

22 VICE CHAIR PETTI: Thanks for that
23 perspective, that's nice. That's good to hear.
24 That's my sense. I can remember presenting to the
25 ACRS.

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1 MEMBER KAMMERER: It was frightening.

2 VICE CHAIR PETTI: Well, that's what
3 everyone had me scared to death about, yes. And, I
4 survived. But thinking I'd be on the other side one
5 day, so. Okay, so with that, I think we can dismiss
6 the court reporter, right? Do I have to do anything
7 with that?

8 MR. BURKHART: Yes, I think the Chairman,
9 this is Larry Burkhart. I believe the Chairman might
10 take public comments.

11 VICE CHAIR PETTI: Oh, that's right.

12 CHAIR HALNON: Yes, so before we release
13 Allegra, we'll take public comments. I'm going to
14 open up the lines for public comment.

15 If you have a public comment, please raise
16 your hand, or we mentioned *5 over the phone. That
17 would raise your hand. Is there anyone from the
18 public that would like to make a comment? Okay seeing
19 none, hearing none, we'll go ahead and close public
20 comment period and Court Reporter Allegra, you are
21 released for the remainder of this meeting. Thank
22 you.

23 Dave, back to you.

24 (Whereupon, the above-entitled matter went
25 off the record at 9:06 a.m.)

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Court Reporter