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

December 2, 1999

MEMORANDUM FOR: Stuart A. Richards, Director  
Project Directorate IV and Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

FROM: Steven D. Bloom, Project Manager, Section 2 *SD Bloom*  
Project Directorate IV and Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MEETING HELD ON NOVEMBER 2, 1999 WITH  
WESTINGHOUSE OWNERS GROUP AND NRR SENIOR  
MANAGEMENT

On November 2, 1999, representatives of the Westinghouse Owners Group (WOG) met with the Office of Nuclear Reactor Regulation management and staff. The purpose of the semi-annual senior management meeting (SMM) is to encourage communication between NRR management and the WOG, discuss emerging issues and concerns, and give the status of important activities of NRR and the WOG. Attachment 1 contains the list of attendees at this meeting. The handouts used by the WOG during their presentation are in Attachment 2, and the transcript for the meeting is Attachment 3.

After the introduction of the meeting participants, Sam Collins, Director of the Office of Nuclear Reactor Regulation, gave the opening remarks, stressing the fact that the NRC needs to be able to anticipate what is coming in the future so that we can determine staff resources and schedules. He noted three areas where the NRC is focusing, planning and budgeting process, organizational and individual effectiveness, and leadership model. Included in the discussion of the organization and individual effectiveness was a discussion of the work planning center. He noted that the NRC is continuing to look at license renewal, since 80 percent of the industry has expressed interest in license renewal, and how resources will have to be distributed to handle all the applications and reviews that may be coming in. Mr. Collins talked about the deliverables for the future, such as 10 CFR 50.59 and the maintenance rule, as well as the oversight process. Mr. Collins also asked for the industry, as well as the owners groups, to be more involved in the regulatory information conference.

The WOG began the meeting with a discussion of the WOG organization followed by a description of how the open items from the April meeting were closed or addressed.

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*PDR TOPRP Westinghouse*

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The first agenda item after the introductions was redefinition of large-break (LB) loss-of-coolant-accident (LOCA) licensing basis, which is the highest priority regulatory issue. The WOG has requested redefining the LOCA break size of the current LB LOCA requirements of 10 CFR Part 50 through rulemaking. The WOG discussed the various benefits of this redefinition, such as peaking factor increases and flexibility in core design, and technical specification improvements.

The next item was containment sump issues, where the WOG has some concerns specifically related to engineering judgement. The WOG discussed two other items related to containment sumps, one was the risk-informed approach, where the WOG has offered to view inputs to that analysis. The other item concerned the application of leak before break (LBB) and General Design Criterion (GDC) 4. The staff stated that the WOG and NRC have two different interpretations of GDC-4 and that it would require rulemaking to apply LBB to GDC-4. On the item of a risk-informed approach, the staff stated that we still need to gather information related to debris generation and transport. The WOG said it would look into rulemaking on GDC-4. Also, the NRC staff needed to respond to a letter sent to the staff on regeneration.

The WOG discussed their baffle barrel bolting (BBB) program which consists of initial baffle bolting inspections and removal or replacement programs at three Westinghouse plants. The WOG has bolts from Farley, Point Beach, and Ginna which are being hot-celled examined. The WOG stated that they would share the results with the NRC. The WOG discussed the materials reliability project (MRP) and how it is following this issue. The WOG stated that BBB degradation is an aging management issue.

The next agenda item was license renewal implementation, which the WOG stated is contained in five generic topical reports. The five topical reports deal with reactor coolant system (RCS) supports, pressurizer, Class 1 piping, containment structure, and reactor internals. The WOG discussed the fact that they have paid \$335,000 in fees for reviews and have not yet received any safety evaluations. The NRC staff stated that we are closest to issuing the safety evaluation for RCS supports.

Reactor coolant pump (RCP) seal issue generic issue (GI) -23 closure was the next discussion item. The WOG stated that they still has WCAP-10541, Revision 2, "Reactor Coolant Pump Seal Performance Following Loss of All AC Power," for review with the NRC which discuss their model for dealing with RCP seals. The NRC staff stated that now with the resolution of GI-23, we would need to look into what to do with the WCAP.

The WOG next discussed the NUPIC/WOG audit which evaluated Westinghouse's analytical capabilities and how they process that type of work in-house. The audit had three findings and one observation.

The next agenda item dealt with the WOGs discussion of NRC requests to review/comment on draft reports. The WOG stated that some of the reports are very in-depth and for them to obtain comments from members of the WOG, discuss the issue with other owners groups (OGs) and even NEI, would require a longer turnaround time. The WOG suggested 60 days and NRR management said that it would look into expanding the time for review/comment from the industry.

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S. A. Richards

- 3 -

December 2, 1999

The last agenda item was a review of WCAPs status. The three WCAPs of concern dealt with the post accident sampling system (WCAP-14986/14987), break opening times (WCAP-14748/14749) and RCP seal performance (WCAP-10541). The WOG also pointed out the five WCAPs on license renewal. The WOG showed a listing of future WCAPs, mostly dealing with risk-informed extensions.

The WOG and NRC had a discussion about fees that are charged for meetings that are held between the OGs and the NRC. The NRC stated that if the meeting was for an application, then the OG is charged, but if a general informational meeting, then the OG would not be billed. Mr. Collins pointed out that the regulatory information conference would have a session on fees and billing. The NRC said it would look into fees charged the WOG for an ACRS meeting. The NRC stated it would look into setting up another workshop on voluntary industry initiatives. The NRC also asked that the WOG submit a listing of possible future licensing actions and WCAPs so that the NRC could allocate resources. Weather-related NOEDs were discussed and the possibility of changing the technical specifications prior to the summer months.

Project No. 694

- Attachments: 1. Attendance List
- 2. Handouts
- 3. Meeting Transcript

cc w/atts: See next page

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Westinghouse Owners Group

Project No. 694

cc:

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Mr. Andrew Drake, Project Manager  
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MEETING WITH WESTINGHOUSE OWNERS GROUP

AND NRR SENIOR MANAGEMENT

ATTENDANCE LIST

November 2, 1999

<u>Name</u>	<u>Organization</u>
S. Binger	W-WOG Project Office
A. Drake	W-WOG Project Office
D. Lounsbury	Public Service Electric & Gas
L. Walsh	Northeast Utilities
J. Bailey	TVA
L. Liberatori	Consolidated Edison
R. Newton	Wisconsin Electric Power
K. Jacobs	NY Power Authority
T. Satyan-Sharma	American Electric Power
L. Collins	ABB CENP
C. Cone	McGraw-Hill
S. Collins	NRR
B. Sheron	NRR
S. Bloom	NRR/DLPM/LPD4
M. Wohl	NRR/DSSA/SPSB
M. Rubin	NRR/DSSA/SPSB
R. Elliott	NRR/DSSA/SPLB
T. Collins	NRR/DSSA/SPLB
S. Richards	NRR/DLPM/LPD4
N. Gilles	NRR/DRIP/RTSB
S. Dembek	NRR/DLPM/LPD4
J. Cushing	NRR/DLPM/LPD4
F. Grubelich	NRR/DE/EMEB
C. Grimes	NRR/DRIP/RLSB

***WESTINGHOUSE OWNERS GROUP***

**WOG / NRC SENIOR MANAGEMENT  
MEETING**

**November 2, 1999**

WESTINGHOUSE OWNERS GROUP / NRC  
SENIOR MANAGEMENT MEETING

One White Flint North - Room 4B4

Rockville, MD

November 2, 1999

9:00 AM - 11:30 AM

*Agenda*

9:00 AM I. INTRODUCTION

- Meeting Purpose
- Agenda Review

Jack Bailey, WOG EAC Chairman

Lou Liberatori, WOG Chairman

9:15 AM II. WOG PRESENTATIONS

Lou Liberatori

- Large Break LOCA Redefinition
- Containment Sump Issues
- Baffle Barrel Bolting Program Status
- RCP Seals/GSI-23 Closure
- License Renewal Implementation
- NUPIC/Technical Audit of Westinghouse
- NRC Requests to Review/Comment on Draft Reports

10:45 AM III. REVIEW WOG NRC SUBMITTALS

Lou Liberatori

- Priority of WOG Submittals
- Future Planned WCAP Submittals

11:00 AM IV. NRC ITEMS

NRC

- Open Discussion

11:15 AM V. CLOSING COMMENTS

Lou Liberatori

- Comments/Suggestion
- Action Item Review

**WESTINGHOUSE OWNERS GROUPS  
WOG / NRC SENIOR MANAGEMENT MEETING  
November 2, 1999**

**I. INTRODUCTION**

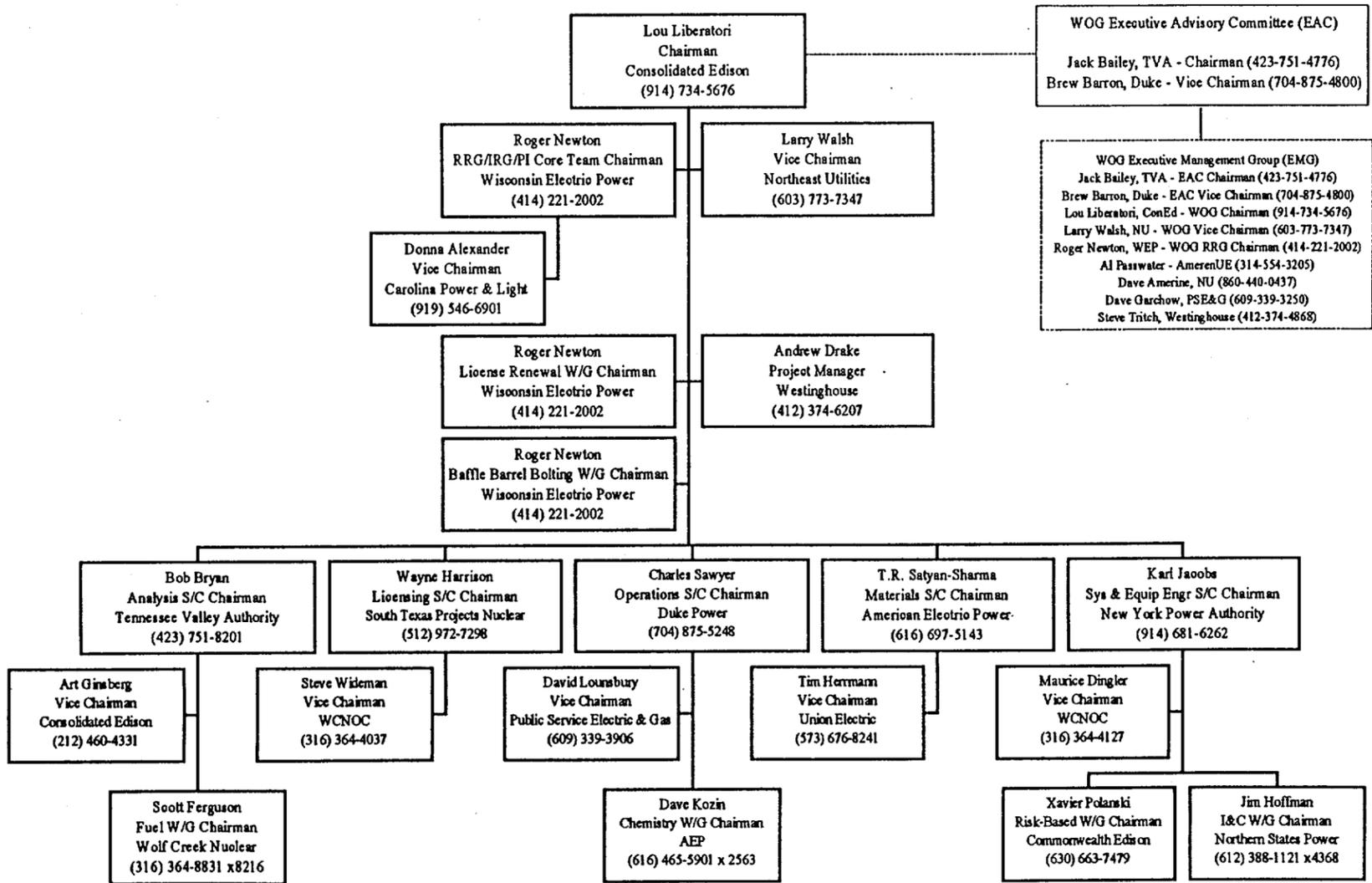
- Meeting Purpose
  - WOG/NRC Information Meetings Implemented in 1992
  
  - Conducted on a Biannual Basis
    - Last Meeting April 29, 1999
  
  - Interface Meetings
    - Maintain & enhance communication channels
    - Allow for candid discussion of open issues / concerns
    - Provide major program activity update
    - Review NRC status of WOG submittals
    - Solicit NRC input to WOG program planning & prioritization process

**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

I. INTRODUCTION - continued

- Agenda Review
  
- 1999 WOG Steering Committee
  - Organizational Chart

# Westinghouse Owners Group Steering Committee - 1999



**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

**I. INTRODUCTION - continued**

- **Response to 4/29/99 Meeting Action Items**
  - Briefing on Top Nozzle Spring Clamp Screw conducted 5/11/99
  - Status of Redefinition of LB LOCA Licensing to be presented at this meeting
  - Comanche Peak and D.C. Cook identified as WOG Reference Plants in support of NRC research on containment sump issue
  - PASS elimination being coordinated with CEOG and NRC
  - WOG contacted ASME on PSA certification standard
    - WOG representative on ASME Project Team
  - JOG AOV guidance document sent to NEI
    - NEI forwarded to NRC & INPO
  - Confirmation of receipt by NRC of BOT WCAP generic submittal letter
  - WOG actively participating in closure of GSI-23
  - WOG members were encouraged to provide comments to revision of 10CFR 50.55a on the elimination of the 120 month update

**WESTINGHOUSE OWNERS GROUP**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

**II. WOG PRESENTATIONS**

- **Redefinition of LB LOCA Licensing Basis**
  - 9/98, Commissioner Diaz requested each OG to identify their highest priority regulatory issue
  - 11/98, WOG reply requested consideration for elimination of the current LBLOCA requirements
  - 2/99, WOG initiated program to evaluate redefining LB LOCA Licensing Basis
    - Review regulations and requirements to identify regulatory impact
    - Determine licensing approach - Proposed Rule Change
    - Define technical approach
    - Industry involvement

**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

II. WOG PRESENTATIONS - continued

- Redefinition of LB LOCA Licensing Basis - continued
  - Licensing Approach
    - Rulemaking to Change 10 CFR Part 50 to Redefine the LOCA Break Size
    - Changes to 10 CFR Part 50
      - 50.46 (c)\*- Acceptance Criteria for ECCS
      - Appendix A to Part 50- GDC- LOCA Definition\*
        - Criteria 4, 17, 19, 38, 46, 50, & 64
      - Appendix K to Part 50- ECCS Evaluation Models- I. C. 1.\*

\* Each of these regulations contains the wording “up to and including a break equivalent in size to the double-ended rupture of the largest pipe in the reactor coolant system.”

**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

**II. WOG PRESENTATIONS - continued**

- **Redefinition of LB LOCA Licensing Basis - continued**
  - **Benefits**
    - **Focus Resources on Risk Significant Events**
      - **Maintain Safety**
    - **Achieve Consistency in the Application of LOCA Requirements**
    - **Reduce Regulatory Burden Associated with LBLOCA**
    - **Technical Specification Improvements**
    - **Peaking Factor Increases/Flexibility in Core Designs**
  - **10/99 NSSS OGs & NEI meeting**
    - **Overall Industry Support**
      - **NSSS OGs, NEI, RI Part 50 Option 3**
  - **Proposed Industry/NRC Meeting**
    - **First Quarter 2000 Time Frame**
    - **Program Overview including Technical Approach**
      - **PRA, LBB and ECCS LOCA Analyses**
    - **NRC Participation in Meeting**

**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

**II. WOG PRESENTATIONS** - continued

- **Containment Sump Issues**
  - WOG is actively participating with NRC
    - Participating in NRC research program public meetings
      - Recently visited transport test rigs at University of New Mexico
      - Test program considered well developed; incorporated many Industry comments
      - Limited Industry concerns identified and recently forwarded to NRC
    - WOG providing technical expertise for Phenomena Importance and Ranking Table (PIRT) panels for both NRC research programs
      - Coatings failure phenomena - Savannah River Technical Center
      - Debris transport and debris generation - Los Alamos National Lab
    - Supporting NRC Research with WOG members
      - Efforts to solicit 100% survey responses continue
      - Two WOG plants serving as “volunteers” for NRC research

**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

II. WOG PRESENTATIONS - continued

- Containment Sump Issues - continued
  - Risk Informed Approach
    - Industry is awaiting NRC risk informed approach and guidance to this issue
    - Offer by WOG to review inputs to risk informed analyses still open
  - Application of GDC-4 and LBB to debris generation
    - Supported by all PWR OGs in letters to NRC
    - NRC held a public meeting on 12/15/98
      - NRC did not endorse PWR OGs' interpretation
      - NRC stated more evaluation needed on the application of LBB to debris generation before NRC position can be developed
        - Current NRC research program does not adequately address PWR debris generation
      - WOG still supports original OGs' position
  - Will continue our active participation

**WESTINGHOUSE OWNERS GROUP  
WOG / NRC INFORMATION MEETING  
November 2, 1999**

**II. WOG PRESENTATIONS - continued**

- **Baffle Barrel Bolting (BBB) Program**
  - **BBB Program Objectives**
    - Maintain safety for WOG plants
    - Proactively manage the program with a systematic approach
      - Assess technical and safety issues
      - Minimize regulatory risk
      - Minimize cost to WOG plants
      - Establish integrated long term plan
  - **Current Status**
    - Site work completed
    - Hot cell examination of baffle bolts removed from Farley, Point Beach, and Ginna is on-going
    - Analysis of acceptable bolting distributions continuing
    - Integrate WOG program tasks with MRP/ITG program tasks

**WESTINGHOUSE OWNERS GROUP  
WOG / NRC INFORMATION MEETING  
November 2, 1999**

**II. WOG PRESENTATIONS - continued**

- **Baffle Barrel Bolting (BBB) Program - continued**
  - **Status of Plant Inspections**
    - Two WOG lead plants have completed their bolt inspection, replacement, and on-site testing programs
    - One WOG plant has performed a bolt inspection and limited replacement program
    - One additional WOG plant is presently performing its own bolt inspection and replacement project
    - Bolt degradation less than anticipated from European experience
    - WOG is tentatively planning to discuss the results of these inspection, replacement, and testing projects with the NRC staff in early 2000

**WESTINGHOUSE OWNERS GROUP  
WOG / NRC INFORMATION MEETING  
November 2, 1999**

**II. WOG PRESENTATIONS - continued**

- **Baffle Barrel Bolting (BBB) Program - continued**
  - **Future WOG Plans**
    - Complete BBB analyses for other plant groupings
    - Evaluation of extending LBB to smaller lines for 2 and 4 loop downflow plants
    - Plan to transition WOG baffle bolting program from a Working Group under the Steering Committee to a program within the Materials Subcommittee
    - Continue to integrate WOG efforts with the PWR MRP RV Internals program
    - WOG and MRP planning to meet with the NRC in early 2000 to provide update on program plans and results
  - **Conclusion**
    - It is appropriate to treat potential BBB degradation as an aging management issue, consistent with the on-going WOG/MRP program

**WESTINGHOUSE OWNERS GROUP  
WOG / NRC INFORMATION MEETING  
November 2, 1999**

**II. WOG PRESENTATIONS - continued**

- **RCP Seal Issue (GSI-23) Closure**
  - WOG participated in July 14 and Sept 2 NRC/OG meetings to discuss closure of GSI-23.
  - WOG made presentation at October 1 ACRS meeting
  - ACRS agreed to closure of the generic aspects of RCP Seal LOCA based on evaluations using PRA models of RCP Seal LOCA
  - WOG plants have assessed RCP Seal LOCA and have shown that contribution to CDF is sufficiently low.
  - WCAP-10541, Rev. 2, Reactor Coolant Pump Seal Performance Following Loss of All AC Power Submitted by letters OG-84-122 May 3, 1984 and OG-86-206 (Rev. 2) December 10, 1986 has been on Hold.
  - WOG still requesting SER

**WESTINGHOUSE OWNERS GROUP  
WOG / NRC INFORMATION MEETING  
November 2, 1999**

**II. WOG PRESENTATIONS - continued**

- License Renewal Implementation - NRC Submittal Status - GTRs
  - 5 Generic Technical Reports Submitted to NRC for Review
    - RCS Supports , Rev 2, (03/97) [Rev. 0 (07/95), Rev. 1 (03/96)]
      - Responded to Two Rounds of RAIs
      - DSER “near” signoff since November ‘97
    - Pressurizer, Rev 0 (07/96)
      - Initial RAIs complete, one additional question 6/99 - response sent
    - Class 1 Piping, Rev 0, (08/96)
      - Initial RAIs complete, two additional questions 6/99 - responses sent
    - Containment Structure, Rev 0. (12/96)
      - Initial RAIs addressed, no feedback
    - Reactor Internals, Rev 0, (09/97)
      - RAIs received 6/99, responses due 11/99
  - Total Review Fees to Date \$335,000; No SERs received.

**WESTINGHOUSE OWNERS GROUP**  
**WOG / NRC INFORMATION MEETING**  
**November 2, 1999**

II. WOG PRESENTATIONS - continued

- License Renewal Implementation - continued
  - Good NRC effort on the Calvert Cliffs and Oconee LR applications
  - Several WOG plants have indicated intent to submit LR applications
  - Many industry issues remain to be resolved
  - Current WOG Program is nearing completion (1993-1999)
    - Need closure on WOG GTRs
  - Proposed New Program (2000-2004)
    - Support WOG Lead Plant(s) and WOG Utilities (2000-2003)
    - Address WOG generic issues
    - Provide Technology Transfer & Revised Guidance Documents (2004)

**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

**II. WOG PRESENTATIONS** - continued

- NUPIC / Technical Audit of Westinghouse
  - NUPIC/WOG audit was held May 3 through May 6, 1999
  - Response to IN 97-015 and IN 97-015 Supplement 1
  - WOG Audit scope
    - LB LOCA Best Estimate model
    - LB LOCA BART/BASH model
    - SB LOCA NOTRUMP models
    - 10 CFR 50.46 reporting
    - Other items identified by audit team
  - Audit report available to WOG members via NUPIC
    - Three findings and one observation
    - Westinghouse responding to all items
    - WOG Analysis Subcommittee providing oversight

**WESTINGHOUSE OWNERS GROUPS**  
**WOG / NRC SENIOR MANAGEMENT MEETING**  
**November 2, 1999**

II. WOG PRESENTATIONS - continued

- NRC Request to Review / Comment on Draft Reports
  - Draft Reports transmitted to WOG & placed in PDR
    - 30 day review and comment period
      - "Evaluation of AOVs at US Light Water Reactors Report" (NRC letter 6/3/99)
      - "Component Performance Study - Turbine Drive Pump, 1987-1998" (NRC letter 7/16/99)
      - "High Pressure SI System Reliability 1987-1997" (NRC letter 8/3/99)
  - WOG endeavors to coordinate member comments with NEI and other industry organizations
  - WOG understands schedule requirements, but request sufficient time to provide a meaningful review

**WESTINGHOUSE OWNERS GROUPS  
WOG / NRC SENIOR MANAGEMENT MEETING  
November 2, 1999**

**III. REVIEW WOG NRC SUBMITTALS**

- Priority of WOG Submittals
  
- Future Planned WCAP Submittals

**WOG WCAP Submittals to NRC**

WCAP #	WOG Priority	Title	OG Letter	Lead Plant	Estimated SER Date	Actions/Comments
14696	N/A	Core Damage Assessment Guidance - Class 3 non-prop.	OG-96-098 November 22, 1996	Wolf Creek	Issued 9/2/99	Approved version to be issued by 11/99.
14986 Rev 1 14987 Rev 1	1	WOG Post Accident Sampling System Requirements: A Technical Basis	OG-98-108 October 26, 1998	Wolf Creek	12/99	Wolf Creek submitted LAR 11/98. Draft SER prepared. Final SER dependent on industry-wide position from NRC (i.e., CEOG).
14748/14749	2	Justification for Increasing Postulated Break Opening Times in Westinghouse Pressurized Water Reactors	OG-97-006 January 31, 1997 Re-submitted OG-98-120 December 10, 1998	Generic	Issued 10/1/98 for BBB Generic TBD	Limited applicability to BBB program. Re-request approval for generic application via OG-98-120 12/98. Approved version of WCAP issued to NRC via OG-99-008 2/99.
10541, Rev. 2	3	Reactor Coolant Pump Seal Performance Following Loss of All AC Power	OG-84-122 May 3, 1984 OG-86-206 (Rev. 2) December 10, 1986	Generic	On Hold	WCAP not actively being reviewed because final generic resolution of issue is being evaluated

**License Renewal Submittals**

WCAP #	WOG Priority	Title	OG Letter	Lead Plant	Estimated SER Date	Actions/Comments
14422 Rev. 2	1	License Renewal Evaluation: Aging Management for Reactor Coolant Supports	OG-97-024 March 4, 1997	Generic	11/99	WCAP-14422 submitted 7/95, Rev. 1 submitted 3/96; Awaiting SER from NRC on Rev. 2
14574	3	License Renewal Evaluation: Aging Management for Pressurizer	OG-96-052 July 3, 1996	Generic	12/99	RAI process complete. Draft SER will contain any remaining open items.
14575	2	License Renewal Evaluation: Aging Management for Class 1 Piping	OG-96-071 August 28, 1996	Generic	12/99	RAI process complete. Draft SER will contain any remaining open items.
14756	4	License Renewal Evaluation : Aging Management for Pressurized Water Reactor Containment Structure	OG-96-103 December 11, 1996	Generic	12/99	RAI process complete. Draft SER will contain any remaining open items.
14577	5	License Renewal Evaluation: Aging Management for Reactor Vessel Internals	OG-97-088 September 2, 1997	Generic	2/00 (?)	RAIs issued 6/99; responses to be provided 11/99

Note: Estimated SER dates are provided by NRC.

### ASIC Subgroup Program

WCAP #	WOG Priority	Title	OG Letter	Lead Plant	Estimated SER Date	Comments
XXXXXX		ASICS Based Replacement Modules for Use in Analog Process Control and Protection Applications	OG-97-069, July 10, 1997; WOG-ASIC-98-002, June 5, 1998; WOG-ASIC-99-019, Aug. 9, 1999	South Texas	2/2000	Chapters 1,2,3, & 7 submitted. Part of Chapter C (Seismic) submitted. Chapters 4, 5, 6, 8, & 9 scheduled. for submittal 11/99.

### Anticipated WOG WCAP Submittals to NRC

WCAP #	WOG Priority	Title	Estimated Submittal Date	Comments
XXXXXX		RT & ESF Logic and Rx Trip AOT and STI	1st Quarter, 2000	
XXXXXX		Risk Informed ATWS	3 <sup>rd</sup> Quarter, 2000	
XXXXXX		Risk Informed AOT Extensions (1 of 4) - AC Power Sources & Distribution	3 <sup>rd</sup> Quarter, 2000	
XXXXXX		Risk Informed AOT Extensions (2 of 4) - DC Power Sources & Distribution	4 <sup>th</sup> Quarter, 2000	
XXXXXX		Risk Informed AOT Extensions (3 of 4) - Fluid Systems (ECCS, SW, CCW, CS)	1 <sup>st</sup> Quarter, 2001	
XXXXXX		Risk Informed AOT Ext. (4 of 4) - Generic (CIV, RWST, MSSV, ADV, PAM)	2 <sup>nd</sup> Quarter, 2001	

**WESTINGHOUSE OWNERS GROUPS  
WOG / NRC SENIOR MANAGEMENT MEETING  
November 2, 1999**

IV. NRC

- Open Discussion

**WESTINGHOUSE OWNERS GROUPS  
WOG / NRC SENIOR MANAGEMENT MEETING  
November 2, 1999**

**V. CLOSING COMMENTS**

- Comments / Suggestions
- Action Item Review

ORIGINAL

OFFICIAL TRANSCRIPT OF PROCEEDINGS  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Title: MEETING

Case No.:

Work Order No.: ASB-300-999

LOCATION: Rockville, MD

DATE: Tuesday, November 2, 1999

PAGES: 1 - 103

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

\*\*\*  
MEETING

U.S. NRC  
11555 Rockville Pike  
Rockville, MD

Tuesday, November 2, 1999

The above-entitled meeting commenced, pursuant to  
notice, at 9:05 a.m.

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

[9:05 a.m.]

1  
2  
3 MR. BLOOM: Good morning. I'm Steven Bloom.  
4 Thank you for coming. We'll go around the room and do  
5 introductions.

6 MR. DEMBECK: Good morning. I'm Steve Dembeck.  
7 I'm the section chief in charge of vendors and owner group  
8 issues.

9 MR. SHERON: I'm Brian Sheron, Associate Director  
10 for Project Licensing and Technical Assessment.

11 MR. SAM COLLINS: Sam Collins, Director, NRR.

12 MR. RICHARDS: Stuart Richards, on PDIV.

13 MR. WALSH: Larry Walsh. I work for North  
14 Atlantic Energy Service Company and I'm the Vice Chairman of  
15 WOG.

16 MR. BAILEY: Jack Bailey, TVA. I'm the Chairman  
17 of the Executive Advisory Committee and Executive Management  
18 Group for WOG.

19 MR. LIBERATORI: I'm Lou Liberatori, Consolidated  
20 Edison and Chairman of the Westinghouse Owners Group.

21 MR. TIM COLLINS: I'm Tim Collins, the Deputy  
22 Director of Division of Systems and Safety Analysis.

23 MR. ELLIOTT: I'm Rob Elliott in the Plant Systems  
24 Branch.

25 MR. WOHL: Millard Wohl, TRA Branch, NRR.

1 MR. RUBIN: Mark Rubin, section chief in the PRA  
2 branch.

3 MR. BINGER: Sam Binger, Westinghouse, the WOG  
4 Project Office.

5 MR. LOUNSBURY: David Lounsbury, PSEG Nuclear, WOG  
6 Operations Subcommittee.

7 MS. COLLINS: Leslie Collins, ABB.

8 MR. CUSHING: Jack Cushing, project manager.

9 MR. SATYAN-SHARMA: T. Satyan-Sharma from AEP,  
10 Chairman of the Subcommittee.

11 MS. CONE: Christine Cone, McGraw-Hill.

12 MR. JACOBS: Karl Jacobs, New York Power  
13 Authority, Chairman of Equipment Engineering.

14 MR. DRAKE: Andy Drake, Westinghouse. I'm the  
15 Westinghouse project manager.

16 MR. NEWTON: Roger Newton from Wisconsin Electric  
17 Power. I'm the WOG Chairman.

18 MR. BLOOM: Okay. Thank you, very much for  
19 coming. In further introduction, Sam, do you have a couple  
20 of words you would like to say?

21 MR. SAM COLLINS: Yeah. Thanks, Steven. I think  
22 we should all identify ourselves before we speak, perhaps,  
23 for the purpose of the record. We are transcribing the  
24 meeting, because of late noticing and we apologize for that.  
25 Essentially, we made a mistake. We intend to keep all of

1 our stakeholders informed of these types of meetings. In  
2 this case, we didn't achieve that, so we are providing a  
3 transcript for the record. That shouldn't inhibit free flow  
4 of information. I think we've been frank in the past and  
5 our discussions have benefited from that, so I look forward  
6 to continuing that.

7 We have a copy of the draft agenda. We appreciate  
8 you providing that to us. I believe we have individuals  
9 available to respond to those topics. If not, certainly, we  
10 will take away any IOUs. We'll review those at the end of  
11 the meeting and make sure that we provide those not only to  
12 the individuals present today, but, also, for the record.

13 These meetings, I think, are very beneficial for  
14 us. They are a kind of unique forum and they're certainly  
15 not unique to Westinghouse. We, also, meet with GE and CE  
16 and B&W. But, they do have the opportunity, I believe, to  
17 focus the staff not only on where the industry is coming  
18 from as an entity with some commonality of vendor types,  
19 but, also, provide feedback to us on how the staff is doing  
20 in performing in those areas.

21 An important aspect of this is the look-forward  
22 aspect of what's coming in the future that we need to be  
23 able to anticipate, as far as staff resources, our concern,  
24 and schedules. I think we have some lessons learned in  
25 those areas. As a learning organization, NRR will take

1 those from our stakeholders and provide for lessons learned  
2 and move forward.

3 As an organization, we are focusing in three  
4 arenas right now organizationally. We're focusing on our  
5 planning and budgeting process, which we hold ourselves  
6 accountable not only for the products, but for the effort  
7 for those products, and I think this couple of topic items  
8 speaks to that today in measuring those deliverables. And  
9 we've talked about those in terms of topical reports in the  
10 past or licensing amendments or other product lines.

11 We're getting a little more sophisticated in  
12 there. Our operating plan is out in draft form. After the  
13 first quarter of this year, we'll be populating that  
14 operating plan with the measurables for the first year --  
15 first quarter of this year, rather, and that will become the  
16 pilot for the agency. We'll transfer that operating plan  
17 knowledge to the other aspects of the agency and throughout  
18 the remainder of this year, with the goal of the first part  
19 of fiscal year 2001, for each aspect of the NRC to have an  
20 operating plan using the NRR operating plan as a template.

21 That's important, because, in order for us to  
22 perform our job in NRR, we have other stakeholders, and our  
23 operating plan and our performance plan cuts across  
24 organizational lines. Decommissioning will be an example of  
25 that. The program lead for decommissioning is with John

1 Greeves in NMSS. Stu has the lead NRR, as far as the Part  
2 50 licenses are concerned. But, we're operating more in  
3 arenas now; so in that decommissioning arena, it's incumbent  
4 on Stu and Stu's staff to coordinate with the -- ultimately  
5 with the arena manager, who is John Greeves, to be sure that  
6 the agency is cohesive and understandable in that area.

7           How does that affect yourselves? Well, when we  
8 start talking about what it takes to get work done, we  
9 essentially plan our product lines and then we measure  
10 those, and we want all of our stakeholders to be involved in  
11 that. And the earlier we can plan and the more we agree on  
12 what the measurables are and what the agreement of success  
13 is, then the better off we are, as an organization.

14           The second area we're operating in right now is  
15 internal and that is organizational and individual  
16 effectiveness. And we operate essentially with a  
17 four-by-four matrix that shows various levels of performance  
18 and various areas that we measure. One of the key focuses  
19 we have right now, which you may find interesting, if not  
20 amusing, is that we -- our work planning center. Quite a  
21 few of our resources right now are focused on the startup of  
22 a work planning center, where we have gone back and mapped  
23 out our processes, identified those product lines, mapped  
24 out the variables, what we need for procedures, and we're  
25 going through those processes.

1           That will include topical report reviews,  
2 amendment reviews, coordinating with research, who is  
3 another one of our stakeholders, as necessary for us to get  
4 our work done on confirmatory research. It's going to  
5 include a corrective action program, for example, which I  
6 know the industry is very interested in the NRC's view  
7 towards an internal corrective action program. And we're  
8 looking right now on whether it should include an employee  
9 concerns program. So, that's a little bit of a vision, but  
10 the flavor is that we're looking for our organization to  
11 become much more accountable and much more disciplined in  
12 how and when we do our work and to be responsive to those  
13 external influences.

14           The third area that I mentioned just briefly is a  
15 leadership model and people like Brian is an associate  
16 director. John Johnson, who is coming in to replace Bill  
17 Kane, will be key in defining this leadership model that we  
18 have and moving it forward. And we have Arthur Andersen  
19 helping us in that arena.

20           Organizationally, we're continuing to refine the  
21 organization. As I mentioned, Bill Kane has gone over to  
22 take over the nuclear materials area. John Johnson, who is  
23 the Deputy Regional Administrator from Region II, will be  
24 coming in to take over Bill's slot, as the Associate  
25 Director for Inspection and Programs. That's a key area for

1 us, as far as liaison with the regions is concerned.

2 John has worked in Region I and Region II. He's  
3 an Annapolis graduate. He has a graduate degree in nuclear  
4 engineering from UVA. He has his Navy nuclear experience,  
5 but he's, also, been a senior resident inspector. He was at  
6 Pilgrim, for example, senior resident. He's worked in the  
7 DRS organization in the regions, in the engineering and the  
8 DRP and was Deputy Region Administrator. So, he brings  
9 those attributes in to the product lines that deal with the  
10 oversight process, definition of the security program,  
11 operating licensing, 50.59 maintenance rule -- all of those  
12 activities of that response in that review, all those areas  
13 that are underneath the Associate Director for Inspection  
14 and Programs.

15 We're, also, continuing to look at license  
16 renewal. I know that's a topic area, as far as today. You  
17 know we have five units in there. For example, we have 80  
18 some odd percent of the industry who has expressed some type  
19 of interest in license renewal. We view, as we map this out  
20 in the future, that we may have upwards of 12 units at any  
21 time in the pipeline going through license renewal. So, we  
22 have a challenge, which is really an industrial engineering  
23 challenge for us, to break up this process into different  
24 product lines and be able to coordinate those, so we can  
25 keep the process moving in the future.

1           Our budget right now calls for four units to come  
2 in this year, four units to come in next year. We should  
3 complete Calvert Cliff's and Oconee this year. That's our  
4 goal. So, I think as far as looking for attentions in our  
5 organization for where our resources are going in the  
6 future, there's two main influences. One is we're not  
7 seeing the amount of plants, perhaps, that we had budgeted  
8 or anticipated in decommissioning. What's the reason for  
9 that? Well, deregulation and these plants being looked at  
10 favorably for being purchased. Oyster Creek is a good  
11 example of that and Oyster Creek was on our radar screen  
12 potentially as a plant for decommissioning. Now, it's on  
13 our radar screen as a plant potentially for license renewal.

14           The resources are very different. The resources  
15 in decommissioning are two to three resources, perhaps, for  
16 the first year, which is similar to an operating unit; but,  
17 then, it tails off. Resources for license renewal are about  
18 22 FTE and a good number of hundreds of thousands of  
19 dollars. It's a way of getting them refined in those areas.  
20 But, clearly, we have product shifts and those product  
21 shifts will drive our resources and we'll have to sustain  
22 communication with you folks to be sure that that's clear in  
23 where we are with expectations.

24           Now, we have the new Chairman. Dr. Meserve --  
25 Cameron Meserve was officially on board last week. He's

1 already very involved in the staff product lines. We're  
2 briefing him on decommissioning. We're briefing him on the  
3 maintenance rule. I noticed over the weekend, he's signing  
4 operator licenses already. So, he's engaged. And we're in  
5 the transition now with his staff. He has a temporary staff  
6 for 90 to 120 days during the transition; then there will be  
7 a number of individuals who are selected for permanent staff  
8 members. That's always a little bit of an unknown for us,  
9 because, clearly, the Chairman deserves and seeks key  
10 members of the staff to help his staff. So, we'll roll with  
11 that for the next 90 to 120 days and then solidify that  
12 staff and then refine the organization.

13 That's a little bit of a capsule. We have a  
14 number of deliverables, I think, that we're going to talk  
15 about today for yourselves; but, I'm sure those that are on  
16 your radar screen, as far as 50.59 and maintenance rule and  
17 those types of products that are being applied.

18 A big milestone for us will be the oversight  
19 process at the end of this year, rolling that out for the  
20 remainder of the plants. We have meetings coming up with  
21 INPO this week and NEI next week, annual meetings. And the  
22 Commission, typically, reserves this part of the year and  
23 the first part of next year to focus on areas that the  
24 Commission believes is important on the staff's schedule.

25 So, I would ask you to follow the tasking memo --

1 Chairman's tasking memo. We put out that periodically. We  
2 have the report we send down to Congress. That's addressed  
3 to Senator Domenici and other stakeholders. Those focus on  
4 key areas. And then, we, also, have the reactor water -- or  
5 reactor -- regulatory information conference. The reactor  
6 water safety conference was last week. The regulatory  
7 information conference is coming up and we'll be looking for  
8 input into the agenda. We should be having that up on the  
9 Web very soon, soliciting agenda topics. We'll be looking  
10 for industry and certainly the Owners Group participation to  
11 help define those products. And we hope to have, as we're  
12 gravitating towards each year, a much more interactive  
13 session, where we have less presentations, if you will, and  
14 more discussions on topics. And in order to do that  
15 effectively, we need to have key stakeholders involved in  
16 that, not only the industry, but -- industry groups, but  
17 certainly generators, as well as other stakeholders. So,  
18 we'll be soliciting that.

19 So, with that, you know, we can go into the  
20 meeting. Jack, I think, you're going to lead us in that.  
21 But, are there any specific topics, Larry, that you or Lou  
22 want to bring up before we start?

23 MR. WALSH: No.

24 MR. SAM COLLINS: Lou is going to have ample  
25 opportunity to talk here. Steve, did you -- Steve?

1 MR. BLOOM: Back up to them and let them start the  
2 meeting. All right.

3 MR. BAILEY: Jack Bailey speaking now. First of  
4 all, I echo your comments on the importance of this meeting  
5 from our perspective. We've been doing this now for seven  
6 years. But, the WOG, itself, has changed fairly  
7 significantly over that amount of time, in some respects,  
8 particularly the last two years. And for example, about two  
9 years ago, we told you we tried to go through a strategic  
10 planning process with the WOG in a previous meeting and  
11 align some of what it's doing with what the industry changes  
12 are requiring it to do, and one of the big things we had  
13 done about a year ago is establish an executive management  
14 group that works more closely with the steering committee of  
15 the WOG.

16 In past years, the steering committee, and even  
17 currently today, pretty much drives the day-to-day  
18 operations of the WOG, but they look for valuable input, in  
19 terms of what they need to be looking forward to in the  
20 future, for both its members and to interact with the  
21 regulator. The executive management helps them do that;  
22 but, I think this meeting and this forum is another valuable  
23 input from our perspective. We do it twice a year and even  
24 though we have a lot of ideas on how we might drive forward  
25 some of the issues we're dealing with, often the input we

1 get in this meeting helps set that direction for us. So, I  
2 put it on the table, as we start the meeting, because we  
3 need those kind of comments and that kind of insight  
4 sometimes from your perspective, too, just as you need it  
5 from ours, from what we're doing.

6 The executive management group is a small subset  
7 of the overall executive advisory committee and we take that  
8 input and talk about it, in terms of giving direction to the  
9 steering committee, too, to help them determine what they  
10 need to do. We try to pick items of importance that are on  
11 the agenda; but, if there are other things on your list,  
12 too, that you think need to be talked about, then feel free  
13 to bring those up at any time during the meeting.

14 Lou is going to take the lead on doing the  
15 presentation and if we need other people to contribute,  
16 also, at some point, we'll just challenge them to come on in  
17 and add to it. So, let's get to it.

18 MR. SAM COLLINS: Okay.

19 MR. LIBERATORI: Good morning, Lou Liberatori.

20 MR. SAM COLLINS: Put that on your tie.

21 [Laughter.]

22 MR. LIBERATORI: Good morning. I'm Lou  
23 Liberatori, Chairman of the Westinghouse Owners Group. I'd  
24 like to open by quickly going through our proposed agenda  
25 for this morning and briefly go over the organizational

1 structure of the WOG, which hasn't changed very much since  
2 the last time we met. But, basically, Jack has already made  
3 an introduction.

4 This is the agenda. We've selected the following  
5 items for presentation this morning: where we are with  
6 respect for our program to redefine a large break LOCA; to  
7 talk a little bit about containment sump issues; where we  
8 are in the baffle barrel bolting program; the GSI-23  
9 closure; where we're headed with respect to license renewal;  
10 I'd like to talk a little bit about a NUPIC audit we had at  
11 Westinghouse, which was sort of our follow-up to some of the  
12 issues that came out of your audit with the Siemens analysis  
13 last time; and talk a little bit about some of the requests  
14 that you've asked us to do, with respect to reviewing draft  
15 reports that become available to you. We'll go through our  
16 normal listing of where we think we are in the WOG topicals  
17 that have been submitted, as well as what we anticipate over  
18 the next year, year-and-a-half. And I'm going to have some  
19 open discussion and closure of the meeting.

20 So, as far as availability, is there any order?  
21 Does anyone have to leave? We can be flexible of how we  
22 present these. Otherwise, I propose we just go down the  
23 list.

24 MR. SAM COLLINS: I think we are prepared of the  
25 order suggested, right?

1 MR. BLOOM: Yes, sir.

2 MR. LIBERATORI: This is what WOG steering  
3 committee structure. It's basically been this way for a  
4 number of years now. We have a chairman, a vice chairman,  
5 an RRG chairman, who are all here in attendance today. The  
6 basic structure has five subcommittees, along with a couple  
7 of special working groups that deal with the baffle barrel  
8 bolting and license renewal, both of which, at the current  
9 time, report directly to the steering committee, rather than  
10 the subcommittee. And I'll be talking a little bit about  
11 that later on, when we get to the presentation on those  
12 matters.

13 We do have our annual elections in February. So  
14 the next time we come in here, there will be a significant  
15 number of changes on this chart.

16 MR. SAM COLLINS: Are you running?

17 MR. LIBERATORI: I'll be stepping down. And so,  
18 there will be elections for a lot of these positions, and  
19 four of the five subcommittee chairmen will, also, be  
20 changing this time around. So --

21 MR. SAM COLLINS: How does that work? Will you --  
22 I mean, I don't want to express as term limits, but, I mean,  
23 is there a motivation to keep people moving through or is it  
24 --

25 MR. LIBERATORI: We have annual elections, but the

1 expectation is that everyone serves a two-year term. And  
2 there have been three-year terms, primarily due to either a  
3 vice chairman not being able to take over or a slot being  
4 open and so forth. So, we tend to fill in as we need to.  
5 But, typically, it's a two-year term.

6 MR. BAILEY: Jack Bailey. The real motivation is  
7 these folks put in 50 to 60 percent of the time, probably,  
8 just in WOG activities. So, any utility that sacrifices a  
9 valuable resource like that, they kind of want them back, at  
10 some point. So, it's a matter of sharing the load between  
11 the utilities.

12 MR. SAM COLLINS: Okay.

13 MR. LIBERATORI: The next slide I have contains  
14 basically the open items from our April meeting. I just  
15 wanted to touch briefly on them and how we close them or at  
16 least addressing them.

17 The first one was a top nozzle, which was a fast  
18 breaking issue, at the time we met in April, and the  
19 Westinghouse fuels people did come in here in May and have a  
20 meeting on that issue. And as far as the WOG is concerned,  
21 we have -- as a WOG, we have no active program with respect  
22 to the nozzle screw issue. Westinghouse is handling that as  
23 a fuel issue directly with the fuel people at the utilities.  
24 We do have our fuel working group chairman following the  
25 issue, working with Westinghouse, so that we do have an

1 avenue for information. But, at this point, it appears to  
2 be handled within the fuel division of Westinghouse. We see  
3 no need for the WOG to interject itself. And people are  
4 preparing, as they get into the fall outages, in the event  
5 that something occurs, so they are continuously planning  
6 this in place at the utilities.

7           The status of redefinition of the large break  
8 LOCA, I have separate slides on that. I'll be covering  
9 that. When we met back in April, we were still looking for  
10 some lead plants to step up as reference plants. Comanche  
11 Peak and D.C. Cook were the Westinghouse plants that have  
12 since stepped up. This gives us both an ice condenser, as  
13 well as a large dry, so we feel that they were good choices  
14 and they should help the overall program.

15           MR. SAM COLLINS: That is commendable of D.C. Cook  
16 -- they have a lot on their plate right now -- to do that.

17           SPEAKER: Thanks a lot.

18           MR. LIBERATORI: PASS elimination, I don't have  
19 any slides to cover this today, but it was becoming active  
20 when we met in April. There's been a lot of activity over  
21 the last six months on that. So, we have been working with  
22 staff and we've made presentations at ACRS. So that program  
23 is moving along and, at this point, we're ultimately  
24 satisfied. We've gotten one SER on the core damage  
25 assessment and hopefully won't be much longer before the

1 second one is out.

2 MR. SAM COLLINS: You're following the ACRS --

3 MR. LIBERATORI: Yes.

4 MR. SAM COLLINS: -- committee comments on that?

5 MR. LIBERATORI: Yes.

6 MR. SHERON: Now, your proposal was not to  
7 eliminate PASS completely, if I remember.

8 MR. LIBERATORI: To maintain some capability for  
9 sampling.

10 MR. SHERON: Which is different from the --

11 MR. LIBERATORI: Which is different from  
12 combustion and we're working to resolve this.

13 MR. SHERON: Okay, and you know we went out with a  
14 Federal Register notice, looking for comment -- or, at  
15 least, I think it's somewhere in the printouts -- it's in  
16 the process of going out to basically solicit stakeholder  
17 comment on the elimination of PASS, primarily from the  
18 states.

19 MR. LIBERATORI: In the emergency planning  
20 perspective.

21 MR. SHERON: Right.

22 MR. LIBERATORI: So, we're active and we're  
23 following that.

24 We've discussed the effort we had ongoing to do  
25 PSA certification among our members and you had suggested

1 that we get in touch with ASME. We did that; not only did  
2 we do that, we actually have a WOG representative on the  
3 project team now. He's involved in some of the standard  
4 writing. So, we're intimately involved in that effort now.

5 MR. SAM COLLINS: How much of a separate effort  
6 are you driving right now, Lou, as opposed to the ASME  
7 committee? I mean, are you working in parallel with them  
8 now or --

9 MR. LIBERATORI: Yes, we're working parallel.  
10 We've had an effort to, over the period of about three years  
11 or so, to do all of our members PSAs. We've completed --  
12 correct me if I'm wrong, I think we've done three so far.  
13 And we're continuing the process, maybe at a little bit of a  
14 slower pace, but we feel it is helping in parallel, because  
15 we're -- as we're doing that, we're learning and are able to  
16 bring that to the --

17 MR. SAM COLLINS: Okay.

18 MR. LIBERATORI: -- project team, as well. So,  
19 we're factoring in some lessons learned, as we go. So, at  
20 this point, we think we're okay. We're just not going as  
21 fast as we had planned on our original project.

22 MR. SAM COLLINS: Right; okay. Thank you.

23 MR. LIBERATORI: As far as the AOV guidance  
24 document, the joint Owners Group had been working on that  
25 collectively. One document was prepared and finalized. And

1 the JOG and our executive committees decided to forward that  
2 to NEI for disposition, with respect to the industry. NEI  
3 looked at it and their selection was to forward it to INPO,  
4 who subsequently issued it in the information exchange and  
5 then, also, forwarded a copy to staff. We know that very  
6 recently some comments were provided back to NEI by the  
7 staff on that document and at this point, those comments  
8 will be sent back to the joint core team, when they do meet.  
9 I believe they're not scheduled to meet until after the  
10 first of the year. But, at this point, they will be fed  
11 back into that group for consideration.

12 MR. SAM COLLINS: I think we got wrapped around  
13 the axle a little bit on that with the comments. But, I  
14 think it's straightened out now.

15 MR. BAILEY: That was the part about INPO being --

16 MR. SAM COLLINS: Exactly. Yeah, we need to be  
17 careful that INPO and NEI are able to maintain their roles  
18 and they're clearly very distinct roles, as opposed to NRC  
19 with their regulatory stand. I mean, we're trying to --  
20 Brian is working on this and it's not an easy issue, about  
21 how to coordinate those three arenas, between NEI, INPO, and  
22 NRC, to try not to be redundant or, in some cases, even  
23 diverse in a way we approach some of these problems.

24 MR. WALSH: If you get a solution, let us know.

25 MR. SAM COLLINS: We're going to talk about it on

1 Thursday.

2 MR. LIBERATORI: But, it's a problem on our end,  
3 too. The Owners Groups are moving into an area, where we  
4 seem to be working more and more on joint topics and, you  
5 know, this is a classic example of that. So, we meant this  
6 as an acceptable way of addressing an AOV program, if the  
7 utility felt it was in trouble and needed some help. And  
8 that's why it came out as an information exchange item from  
9 INPO.

10 MR. SAM COLLINS: This is an area that we might  
11 want to just remain sensitive to, because in our trying to  
12 resolve the issue, Larry, about how to handle these  
13 generator communications or how to broker and take credit  
14 for industry initiatives, the Owners Groups may have a role  
15 in that. You know, as we continue down this path, we may  
16 very well need to call other people to the table and try to  
17 understand better how to do that effectively and  
18 efficiently.

19 MR. LIBERATORI: And we would be open, as well.  
20 As I said, the efforts are -- our cooperation with each  
21 other of involvement, as well.

22 MR. SAM COLLINS: I'm going to more actively meet  
23 with INPO on Thursdays.

24 MR. LIBERATORI: The next item has to do with the  
25 break opening time WCAP. The staff did issue an SCR, but

1 limited its application to strictly the baffle bolting issue  
2 and our original request had been for a general approval of  
3 that. And we resubmitted a request clarifying that. When  
4 we met last time, we weren't quite sure, you know, where  
5 that ended up. We have cleared that up in the meantime.  
6 Andy, I believe, through Steve, has made some contacts. And  
7 you do have the re-requested letter and we can talk about it  
8 later. It's on the table of WCAP and is still outstanding.

9 MR. SAM COLLINS: We're going to come back to that  
10 today, Lou?

11 MR. LIBERATORI: Yeah.

12 MR. SAM COLLINS: Okay.

13 MR. LIBERATORI: It's just that we didn't have an  
14 answer when we met last time.

15 MR. BAILEY: Since we're not going to cover AOV as  
16 part of the agenda, I think we need to go back and just put  
17 something on the table, as part of this discussion. The  
18 direction the industry is going right now is one where we  
19 will have a program guidance that's out there, right now  
20 issued through INPO as a guidance document. But, there is  
21 not a move right now underfoot to have an industry  
22 commitment to a program similar to like the steam generator  
23 program, for example, where NEI signed off on it.

24 So, in that respect, it will be a guidance  
25 available to the industry to put a program in effect, but

1 there will be no requirement, at this point, for them to  
2 have to follow that, unless they have a problem with AOVs  
3 and they deal with it. So, I don't know if that creates a  
4 problem for you, but I just wanted to make sure that was  
5 clear, that that's where they think they're going -- or  
6 where the industry thinks it's going right now.

7 MR. SHERON: I don't know -- he just went to seek  
8 to get engineering here.

9 MR. SAM COLLINS: Okay.

10 MR. SHERON: We may want to come back to that.  
11 I'm trying to get our engineering folks here.

12 MR. LIBERATORI: At the last meeting, we talked a  
13 lot about reactor coolant pump seals and that the closure  
14 for GSI-23 was going to become very active, which it did.  
15 And we participated in a number of meetings since last  
16 April. We, also, made a presentation at ACRS just on  
17 October 1st. I do have a slide on that later; but, clearly,  
18 we've engaged with respect to the closure of that issue.

19 And the last item here was whether or not we, as a  
20 WOG, were going to comment on the proposed changes to  
21 50.55a, specifically with respect to elimination of the  
22 10-year update. And as a WOG, we determined not to comment,  
23 strictly based on the diverse opinions within the Owners  
24 Group; it was difficult to come to one consensus. However,  
25 we did encourage our members, from their own perspectives,

1 to provide comments either directly or through NEI.

2 MR. SHERON: Do you have diverse perspectives on  
3 that issue?

4 MR. LIBERATORI: Yeah.

5 MR. SHERON: I mean, I remember when the industry  
6 comments came in and I think they were all like rubber-stamp  
7 letters. I'm just -- I was curious why you have diverse  
8 comments. But, that's okay; you don't have to get into it.

9 MR. SAM COLLINS: Lou, are you following ACRS  
10 comments under closure or GSI-23? Are you familiar with --

11 MR. LIBERATORI: Yes, we have -- in fact, Dave was  
12 the one who made a presentation at ACRS and he's been close  
13 --

14 MR. SAM COLLINS: Okay. So, you have seen the  
15 questions potential of how many plants have the upgraded  
16 seals. Is there -- is it appropriate for the staff to do a  
17 study, you know, to determine potential or should we look at  
18 other seals and those types of things?

19 MR. LOUNSBURY: Dave Lounsbury. My personal  
20 opinion on that is it's a misconception with the high  
21 temperature old rings. They're definitely improved; they're  
22 definitely better; however, the old rings are still  
23 functioning. And all the plants that have been out there  
24 are moving to SPO criteria, that they're currently licensed  
25 to, have had to prove that the old style old rings were

1 still adequate through safety especially applied to the  
2 coking. But, there was the slight misconception that with  
3 the ACRS, in my opinion, that they have this new and latest  
4 and greatest, you know, design, why isn't everybody jumping  
5 on it. But, when you look at the cost of putting that in  
6 and the ALARA consideration and all these other things, if  
7 what you have is adequate, why incur the extra cost.

8 MR. LIBERATORI: A number of people had them in  
9 stock that they were using and other people, as they were  
10 doing normal RCP maintenance, are phasing over to the new  
11 high temperature old rings. There are some utilities that  
12 have high temperature old rings on sump pumps and not on  
13 others, so they're handling them in the normal scheduling of  
14 maintenance, as opposed to a speeded up back fitter sorts.

15 MR. SAM COLLINS: Okay; thank you.

16 MR. LIBERATORI: Redefinition of large break LOCA  
17 design basis: back in September, 1998, Commissioner Diaz  
18 requested all of the Owners Group to identify their highest  
19 priority regulatory issue, and the one we selected at that  
20 time was to open a consideration for eliminating the current  
21 large break LOCA requirements. Collectively as an Owners  
22 Group, we had seen a lot of effort, both in time and money,  
23 going toward issues that directly related to or were  
24 primarily driven by large break LOCA considerations and  
25 given the risk informed world we were moving into, it seemed

1 like the time was ripe to reconsider that. So, that's what  
2 we had proposed.

3 We went back to our members. In February '99, we  
4 initiated a program basically to evaluate such. And it  
5 really had four components: one was to review the  
6 regulations, identify regulatory impact; the second was to  
7 determine what the licensing approach would be for that,  
8 because, obviously it would involve some proposed rule  
9 changes; define a technical approach; and then, also, at the  
10 appropriate time, obtain industry involvement on this,  
11 because it couldn't just be a Westinghouse Owners Group  
12 effort. So, this was basically phase one of our program,  
13 which is really still ongoing.

14 This slide shows the licensing evaluation we did.  
15 Basically, there are three specific areas in the Regs:  
16 50.46, as well as Appendix A and a number of the GDCs and  
17 Appendix A, that all specifically define the large break  
18 LOCA, as up to and including the double-ended rupture. So,  
19 these were the areas that we knew required attention on our  
20 part.

21 MR. SHERON: What exactly were you proposing on  
22 this?

23 MR. LIBERATORI: We haven't yet.

24 MR. SHERON: Oh, okay; I'm sorry.

25 MR. SAM COLLINS: The approach, though, is change

1 the rulemaking.

2 MR. LIBERATORI: Yes.

3 MR. SAM COLLINS: The approach is rulemaking.

4 MR. LIBERATORI: The approach is rulemaking.

5 MR. SHERON: I'm sorry, I was going to say that,  
6 you know, this maybe considered as part of the option three.

7 MR. LIBERATORI: Yeah.

8 MR. SHERON: Okay; I'm sorry.

9 MR. LIBERATORI: Yeah. Basically, we've been  
10 working for most of this year in a rather deliberate way to  
11 identify what changes were needed; what would be the  
12 technical background for it; how would the utility members  
13 use it; is there a cost benefit; what are the upsides; what  
14 are the downsides and so forth.

15 And I've categorized a number of the benefits  
16 here: one is it would allow you to focus the resources on  
17 more risk significant or more likely events, as opposed to  
18 the large break LOCA; it's to achieve consistency within the  
19 application of the LOCA requirements, particularly with  
20 respect to the regulations, themselves; reduce regulatory  
21 burden associated with large break LOCA. There are a number  
22 of tech spec improvements that could come out of this, both  
23 with respect to definitions of what operability really is  
24 and what functionality is and LCOs, and a number of those  
25 things could evolve from this. And, also, peaking factor

1 increases could lead to additional flexibility in core  
2 design. What we really found here is -- there are 23  
3 members in the Owners Group and everybody has a different  
4 number one way they would use this. It's one of those  
5 things where it's not one or two really big hitters, but  
6 everybody could use this in a different way, depending on  
7 their plant specific situation.

8 MR. SHERON: What is the biggest area of benefit?  
9 Is this -- I mean, you mentioned a couple there. Is this  
10 basically in stuff like ease of generator start time?

11 MR. LIBERATORI: That is one of the lead ones.

12 MR. SHERON: Okay.

13 MR. LIBERATORI: It could be operability -- it  
14 could be -- I might be able to leave an accumulator out of  
15 service.

16 MR. WALSH: A few points would be an upgrade would  
17 almost be automatic.

18 MR. SHERON: Yeah. Well, Westinghouse plants, I  
19 think, they only mention local entity. So, obviously --

20 MR. LIBERATORI: Right. And you still would have  
21 your other -- you know, you would still have DNB and steam  
22 reduce, so other limits that would restrict where you could  
23 go with this. But, it does give you a little bit more  
24 flexibility to work with. These are some of the general  
25 categories. But, again, there are pages of different ways

1 people could see themselves using this. And then one of the  
2 reasons being fairly deliberate on this is to make sure the  
3 effort is focused and we can identify a few things that  
4 everybody can get behind.

5 We did last month meet with the other Owners  
6 Groups, together with NEI, and EPRI was at the meeting, as  
7 well. We presented, you know, where we had gone with this;  
8 you know, that we had broken the ground and got the ball  
9 rolling. Basically, the industry is supportive of this. It  
10 appears where we might be headed, and I can't say that for  
11 sure yet, because we're still working out the details, but  
12 it appears we might be forming a task force under the NEI  
13 risk informed Part 50 working group. That would, then,  
14 become the focus with the industry effort on this. So, the  
15 Owners Groups would still be engaged. It would still be our  
16 work. At least, we would be focused, you know, through this  
17 NEI task force.

18 MR. SHERON: Are you just focusing strictly on  
19 break opening time or are you looking at a broader --

20 MR. LIBERATORI: Broader than just break opening  
21 time.

22 MR. SHERON: Okay. But, in terms -- I'm just  
23 thinking out loud here. In terms of what the ultimate  
24 benefit -- in other words, you could only go so far, okay,  
25 and then you're going to run into upper limits, okay. And

1 you get some increase in, say, peaking factor, you know,  
2 kilowatts per foot and stuff; but, at some point, you run  
3 into a limit like on transients and the like, in which case  
4 any further relaxation of LOCA requirements isn't really  
5 going to be much of a benefit.

6           What I'm sort of driving at is, there's been some  
7 other options kicked around here, okay. One is, for  
8 example, just redefining the decay heat curve that's used,  
9 instead of the 1971 ANS plus 20 percent, with 79 plus two to  
10 sigma set, all right. Baker Just get -- you know, instead  
11 of Baker Just, use Cath Carpel from metal water reaction.  
12 I'm just curious, because those are -- you know, in terms of  
13 the actual rulemaking, okay, some things, I think, can be  
14 done a lot easier than, you know, a more comprehensive major  
15 overall, because, I mean, obviously, the LOCA provides the  
16 design basis for the containment, okay. And if you  
17 eliminate -- okay, and there's a lot of margin that we take  
18 credit for in severe accidents from the containment. The  
19 fact that, you know, these containments hold 50-60 pounds of  
20 pressure, but that's the ASME limit.

21           When you look at their ultimate strength, it's,  
22 you know, three times -- two-and-a-half times as much, and  
23 you get a lot of benefit and risk base from that. And so,  
24 we always ask the question, is that if we start backing off,  
25 are we losing a lot of that margin we had in severe accident

1 space, because, now, you know, if you don't have the break  
2 opening, maybe you don't get the mass energy release and,  
3 therefore, you know, somebody says, gee, you know, our  
4 containment pressure doesn't have to be as high anymore;  
5 it's only 25 pounds instead of 50.

6 MR. LIBERATORI: That would affect the ultimate  
7 strength capability of containment --

8 MR. SHERON: Of existing containments. But the  
9 question is: what do you do about a new plant, then? Okay,  
10 if they go and design the plant to these new revised rules,  
11 are they going to come in and say I don't need a  
12 containment, it only holds 20 pounds. I mean, you know --

13 MR. WALSH: The area that we started looking at  
14 and we're not finished yet, steam line break is just as much  
15 pressure as the LOCA.

16 MR. SHERON: Yeah.

17 MR. WALSH: So, unless we can come up with a  
18 monitoring system for the steam line break, which would be  
19 very difficult, that's going to be a little bit more of a --

20 MR. SHERON: The only reason I'm saying this is  
21 that, you know, from a standpoint of getting some benefits,  
22 okay, based on improved knowledge, rulemakings that don't  
23 have huge sweeping changes to them, okay, sometimes are  
24 easier to push through. And in terms of whatever the  
25 perceived benefit is, you know, there may be some -- you

1 know, some relief that you could get that basically gets you  
2 where you're not LOCA limited anymore. You might want to  
3 think about it, that's all.

4 MR. LIBERATORI: Understood. And as I said, we're  
5 spending a lot of time on decisional analysis and framing  
6 that, so that we can identify what the benefits are. And I  
7 guess what we were proposing here is we think, as an  
8 industry, we'd be ready to meet with staff in the first  
9 quarter roughly and exchange exactly that kind of dialogue,  
10 which obviously has to be a two-way discussion, and where  
11 maybe you see it fitting in over here, as well, from your  
12 perspective. But, clearly, we would intend to have a 1.174  
13 analysis. We'd be looking at extrapolating before break to  
14 the analytical arena, where we can't go right now, and where  
15 we think we'd be going, in terms of what would be the design  
16 basis ECCS analyses, if you will. So, you know, all of  
17 these are on our table and we're dealing with those right  
18 now. So, you know, we, again, think we'd be prepared to  
19 meet with you in the first quarter.

20 MR. SHERON: Okay.

21 MR. SAM COLLINS: Yeah, I think we want to keep  
22 our options open. Part 50, option three is a vehicle. It's  
23 a study right now.

24 MR. WALSH: That's got some concern with us, that  
25 we're behind their areas --

1           MR. SAM COLLINS: Right, and to the extent whether  
2 that study ever comes to fruition and how much of it is --  
3 becomes practical to apply and what format it's done, and  
4 then whether the industry is asked to take advantage of all  
5 of Part 50 or parts of Part 50, I think is just knowledge we  
6 have to put on the table. And the reason is, I think, our  
7 stakeholders, who are interested in improving the  
8 regulations by whatever means, need to understand all the  
9 options. Whether it's a petition for rulemaking or whether  
10 it's option two or option three, the expectations have to be  
11 clear. Obviously, you're putting a lot of work and  
12 resources into this. So, we need to be able to lay out for  
13 you what the variances are between these three success  
14 paths, and that should be a topic at a meeting that we have,  
15 so that we aim this in the right direction and understand  
16 what the backside of these processes are.

17           MR. BAILEY: And we agree with you. This is  
18 probably the most complex of the issues we're dealing with  
19 right now. It started off as an Owners Group initiative a  
20 year ago -- or two years ago, almost; but, then, I think,  
21 superseded, in some cases, by some of the things that have  
22 started to develop within the industry, within the NEI  
23 working group. And we saw that at one of our strategic  
24 planning meetings and we told them to integrate it with the  
25 NEI activities. But, even then, I think it's going to take

1 a considerable amount of dialogue between the industry and  
2 the NRC to figure out which path to go down here.

3 MR. SAM COLLINS: Okay.

4 MR. LIBERATORI: Well, we're giving this great  
5 attention. Larry, who is Vice Chairman of the overall WOG,  
6 is really heading up the team that's working on this. So,  
7 you know, we're giving it our highest attention, at this  
8 point.

9 The next topic is containment sump issues. The  
10 WOG has been actively participating with the staff. We've  
11 been involved in the public meetings. We've had  
12 representatives out at the University of Mexico meetings not  
13 too long ago. The general consensus of the feedback we've  
14 gotten is that the program is well developed and many of the  
15 comments have been incorporated. We do still have some  
16 limited concerns, which we have forwarded to the staff,  
17 primarily in those areas where we're trying to extrapolate  
18 engineering judgment. And I didn't plan to go into those in  
19 detail here, but they have been forwarded to the appropriate  
20 members of the staff.

21 MR. SAM COLLINS: Are you communicating  
22 effectively on those?

23 MR. JACOBS: Karl Jacobs. Communication, both  
24 with the staff members and the plants, have been very, very  
25 good.

1 MR. SAM COLLINS: Good. It's good feedback.

2 MR. LIBERATORI: So, we've been participating on  
3 the PIRT panels, both of them. We've -- as I mentioned  
4 earlier, we did -- we were able to get two volunteers to  
5 step up to be representative of the plants. We continue to  
6 urge our members to provide what they need to provide to  
7 NEI, with respect to the survey responses. Two items we did  
8 want to have a little bit of discussion on: one was the  
9 risk-informed approach. It was our understanding that you  
10 were going ahead with risk informing the approach, as well  
11 as guidance to this issue. We really haven't heard anything  
12 on that.

13 We had made an offer to view inputs to that  
14 analysis. That offer still stands. We're just not sure  
15 where that stands in your overall progress on this effort.  
16 But, we're looking for maybe where this stands, as well as  
17 where the application of GDC-4 and leak before break stands  
18 with respect to this particular issue. We had a meeting  
19 about a year ago and, at that time, the staff said they  
20 weren't prepared to endorse the Owners Group interpretation;  
21 however, you wanted to do more evaluation before you decided  
22 on whether leak before break could be applied to debris  
23 generation aspect of the issue.

24 And, again, one of the reasons we bring this up is  
25 that we don't see anything in the planning right now dealing

1 with the debris generation aspect of it. It's been focused  
2 mostly on the transportation of plugging. So, we're  
3 wondering if you had gotten to the point where, you know,  
4 you knew where you were headed on that or not yet.

5 MR. SAM COLLINS: Tim, Rob, you want to --

6 MR. ELLIOTT: Rob Elliott. As far as regeneration  
7 goes, our current plan right now is to scale the BWR data  
8 out there for analysis purposes. We have tried -- we've had  
9 discussions with the Owners Group to talk about their test  
10 program, about whether or not they could address the issues,  
11 as far as debris generation goes, and I don't believe we've  
12 had any final discussion on that. I know that, Carl, you  
13 guys were going to go back and talk over what you wanted to  
14 do in the way of testing and we haven't yet met again to  
15 find out what was concluded in those discussions.

16 Let's see, what was the second question?

17 MR. LIBERATORI: It was the risk-informed approach  
18 and the GDC-4 approach.

19 MR. ELLIOTT: Basically, with the GDC-4 approach,  
20 I think what we have is two different interpretations of  
21 what was approved by the staff originally for GDC-4. And we  
22 -- I thought we had said this in the letter to you all that  
23 we believed that it would require a rule change to apply  
24 leak before break to issues that are related to ECCS design,  
25 because the statement of consideration for GDC-4 clearly

1 says that containment functional design and ECCS functional  
2 design shall retain their current nonmechanistic  
3 requirements for doubling the breaks.

4           So, I thought we had addressed that question; but,  
5 what we were, also, going to do, as part of our research  
6 program, was to evaluate what the impact on ECCS design; as  
7 far as what would be the differences between a double-ended  
8 break and a leak, in which debris would be generated by a  
9 worse case leak and whether or not that could potentially  
10 cause a failure of ECCS. So, we've been proceeding with our  
11 research program, with the intention of addressing both  
12 aspects of the pipe break and seeing what the impacts are.

13           As far as the risk approach goes, the way we've  
14 been treating risk is mostly from an issue of conditional  
15 failure probability. Now, we're nowhere -- the reason why  
16 we haven't shared any information with you is we're a long  
17 way away from being able to do the risk analysis, because  
18 there's a lot of information that we want to gather relative  
19 to transport and head loss and debris types and that sort of  
20 thing. But, we were looking at it from the perspective of  
21 how likely, given a LOCA, were you likely to fail the sump.

22           And that's essentially the way the analysis is  
23 that is set to proceed right now. We weren't -- basically,  
24 we were looking at it as risk analysis would help us to make  
25 a judgment of whether or not any kind of act that would be

1 needed, based on, you know, it is not very likely; where  
2 there's other mechanisms, it is more likely to fail the ECCS  
3 than clogging them, you know. Obviously, you know, it will  
4 probably be a priority issue. If it's highly likely to  
5 fail, you know, we're going to need -- we'd have more  
6 concerns that we would want to address to the industry.

7           That's, basically, how we've been proceeding. And  
8 we've been having discussions with the three Owners Groups  
9 and I know that there is still a little bit of confusion.  
10 We've been trying to work on explaining it, in more detail.  
11 And I thought we had -- we did get some comments on the test  
12 program, but I didn't know if there were still comments that  
13 we needed to address on --

14           MR. JACOBS: We've sent you some more comments.  
15 This was to Michael.

16           MR. ELLIOTT: Okay.

17           MR. JACOBS: One of them did address the  
18 risk-informed area; one addressed engineering judgment. We  
19 -- it back into the plume and how the plume will do that;  
20 how to get the debris off the floor; how the plume cannot  
21 really -- can't do that, you have to use engineering  
22 judgment to that issue. Those are one of the main items  
23 that we're looking at and how you guys can address that  
24 area. Our concern with engineering judgment brings too much  
25 conservatism into the analysis. So, those are the major

1 issues that we have.

2 MR. ELLIOTT: Well, I would say, I haven't seen  
3 the letter yet, so --

4 MR. JACOBS: It's with Research.

5 MR. ELLIOTT: Okay. I'll check into that. We  
6 have another meeting shortly coming up.

7 MR. JACOBS: You're being forwarded a copy. You  
8 were left off by accident.

9 MR. ELLIOTT: Okay.

10 MR. SAM COLLINS: Okay. I just -- Sam Collins. I  
11 just want to be clear, Carl, I've got -- on this slide, I  
12 picked two issues out: one is waiting NRC risk-informed  
13 approach and there's an offer that's on the table, I think,  
14 for review; and then the other issue is three quarters of  
15 the way down, where we talked about halfway addressing the  
16 research program does not adequately address the debris  
17 generation and that the Owners Groups still supports the  
18 original positions. Are those being worked in forums that  
19 you feel like --

20 MR. JACOBS: the issue with the debris generation  
21 is we feel very uncomfortable -- there's too much concern  
22 with using the PWR OG data to try to scale OG. There's  
23 another way of using inside judgment. We'd like to see how  
24 we can work that out, but we know the resources are limited  
25 on how to address that. We're actually just putting on the

1 table that that's an issue. When you do your evaluation,  
2 we've got to make sure that that conservative judgment is as  
3 realistic as possible.

4 MR. SAM COLLINS: Okay. And you feel like you  
5 will be able to work through that issue, as part of the  
6 process we're currently engaged in?

7 MR. JACOBS: That's correct. I still think we can  
8 work it out. We haven't gotten to that issue right now.

9 MR. SAM COLLINS: Okay. And the issue of the  
10 risk-informed approach, Rob, will we respond to that once we  
11 see the letter?

12 MR. ELLIOTT: Yeah, absolutely. I just wasn't  
13 aware of the letter, so I haven't had a chance to look at  
14 it.

15 MR. JACOBS: The research -- Grant was going to  
16 put out recently another workshop on that issue and right  
17 now, we haven't heard when that workshop is going to be  
18 done. It's supposed to be done this quarter. I think it  
19 may be postponed into the new year. So, that's one of the  
20 other driving forces. We expected to hear in November, but  
21 now it may be postponed.

22 MR. SAM COLLINS: Okay.

23 MR. TIM COLLINS: I still have a question of  
24 clarification here. When you say "WOG still supports its  
25 original position," I thought the original position that you

1 sent in was on the interpretation of GDC-4, not on -- okay.

2 MR. LIBERATORI: That's why it's here. But,  
3 basically, it's the same benefit --

4 MR. TIM COLLINS: That's no different than the use  
5 of the debris generation -- you know, whether it's being  
6 engineering -- it's an engineering judgment call or not;  
7 that's different from how you interpret GDC-4 and the  
8 applicability of the debris generation to LOCA. Now -- so,  
9 when you say it still supports the original position, you're  
10 saying you disagreeing with the position the staff issued in  
11 its 1999 letter back, which said this is the way we see  
12 GDC-4. Is that what we're saying here?

13 MR. LIBERATORI: Well, we interpret it -- we  
14 interpret the staff's position as -- that this is where you  
15 were at the time we met and discussed it.

16 MR. TIM COLLINS: That's correct.

17 MR. LIBERATORI: However, you were going to  
18 consider it and maybe rethink it after you had done this  
19 work.

20 MR. TIM COLLINS: Now, that's not what the letter  
21 was intended to say. The letter was intended to say, here's  
22 the way we see GDC-4. Now, if we need to change GDC-4, you  
23 know, if we need a rulemaking, we need supporting  
24 information to do that, okay. And this research was  
25 supposed to develop supporting information to any changes in

1 the regulation; or if it turned out to be a more significant  
2 risk area than our initial study showed, possibly back that.  
3 But, it wasn't to contribute to the interpretation of GDC-4.  
4 It was to contribute to any additional regulatory action  
5 that may be taken, whether that be a change to the  
6 regulation or some additional back fitting consistent with  
7 the current interpretation of the regulation. That's what  
8 the letter was intended to say. If you got a different  
9 message, then we need to talk about that letter.

10 MR. LIBERATORI: Okay. I guess just for Sam's  
11 benefit --

12 MR. BAILEY: There are actually three here.

13 MR. LIBERATORI: Yeah. What the three Owners  
14 Groups really -- what the three Owners Groups were really  
15 trying to say is that the generation is created by the  
16 dynamic effects of the break. And the way we read GDC-4, it  
17 specifically says the dynamic effects of the break can be  
18 excluded, based on before break, and we use that application  
19 in a number of arenas. So, if the forcing function is the  
20 dynamic effects -- you know, if our position was GDC-4  
21 already excludes the dynamic effects, that's why the debris  
22 would be limited, and that was our position.

23 MR. ELLIOTT: This is Rob Elliott, again. You're  
24 focused on the words and not so much on the intention of the  
25 rule. When GDC-4 was put out, it was talking about type of

1 constraints, physical protection of equipment important to  
2 safety. It wasn't talking about whether or not debris would  
3 be generated, okay. And when we're talking the issue of  
4 strainer or sump clogging, what we're talking about is the  
5 functional design of the ECCS. We're talking specifically  
6 about the functional design of the sump, okay.

7           So, it's not -- when they wrote the statement of  
8 considerations, they recognized there was this dichotomy.  
9 On the one hand, when you're talking about dynamic forces  
10 and impacting equipment and that sort of thing, we  
11 recognized that -- or you take credit for leak before break.  
12 But, we said specifically in the statement of  
13 considerations, functional design is of containment and the  
14 ECCS would still retain to one in -- in break. And 50.46,  
15 also, is pretty specific about all breaks up to and  
16 including, as you noted on your previous slide.

17           So, the research program that we're doing right  
18 now is really not focused on -- it would provide us  
19 supporting information, but it's not focused on redefining  
20 50.46 or even, you know, defining the risk-informed, you  
21 know, 50.46. We're using risk as a tool to help us assess  
22 the significance of the issue. But, we're not going the  
23 mode about -- of a rule change or changing the rules or  
24 determining whether or not we can -- it's okay to apply to  
25 50.46.

1 MR. LIBERATORI: I understand. That's why I think  
2 we've agreed to disagree.

3 MR. ELLIOTT: Yeah.

4 MR. LIBERATORI: The same jet has to be considered  
5 here and not considered there.

6 MR. SHERON: Let me ask you, when we changed the  
7 interpretation of GDC-4 in the first place, and the reason  
8 was, is because we said, you know, until we come up with a  
9 better design basis for containment, okay, I mean, to just  
10 to sit there and say we're going to eliminate the double  
11 guillotine and give credit for leak before break, you know  
12 -- you know, I remember back in the early '80s when we did  
13 that, you know, the question was, fine, what are we going to  
14 design containments to, all right? Are we going to have  
15 people coming in saying that, you now, I can eliminate leak  
16 requirements and all sorts of other stuff, and nobody had an  
17 answer as to how we were going to handle that whole big  
18 issue.

19 So, that's why the leak before break was  
20 restricted to the pipe restraints and so forth for the  
21 dynamic effects. And the idea was that when and if we come  
22 up with a better way to design -- or to come up with a  
23 design basis for containment and ECCS, you know, we're  
24 willing to go back and revisit it. But, that -- you know,  
25 that never took place.

1 MR. TIM COLLINS: The consideration explicitly  
2 identifies that dichotomy. It says, "we recognize it's  
3 there," you know, and we have to live with it until we can  
4 figure out something better.

5 MR. SHERON: But, I think from a risk aspect of  
6 looking at this issue, okay, I think we would certainly take  
7 into account in risk base, from a realistic risk assessment,  
8 the fact we recognize pipes don't instantaneously settle,  
9 okay. And that would show up as part of the risk -- the  
10 overall risk assessment of it.

11 MR. SAM COLLINS: The question is, and that's the  
12 third issue, I think, that Jack brought up, do we need to  
13 put on the docket this task, if we haven't already -- maybe,  
14 we have, Ron -- the staff's position in this area, so that  
15 the guidelines are clear.

16 MR. TIM COLLINS: It went out a year ago.

17 MR. SAM COLLINS: Consistent with the statements  
18 we just -- so, it was just a disagreement on it, whether  
19 that's --

20 MR. TIM COLLINS: No, we documented that in a  
21 letter.

22 MR. SAM COLLINS: Is that what we're talking  
23 about?

24 MR. SHERON: All we are saying is, you know, we  
25 have to follow, you know, our lawyer's advice and the

1 statement of considerations clearly restricts it, okay.

2 But, again, my understanding is, you know, this issue is not

3 -- this is strictly a matter -- the staff has an itch, okay.

4 Somewhere down the road -- I mean, if we decide that the

5 sump designs are inadequate for PWRs, the burden is on us,

6 okay, to make that case and to follow our own internal

7 procedures for back fitting; and in doing so, we would

8 obviously, you know, have to make a risk argument and the

9 risk argument would have to be based not on something that's

10 overly conservative, but we'd have to take into account the

11 recognition that pipes don't instantaneously --

12 MR. BAILEY: It seems to be a subset of the large  
13 break LOCA issue we talked about earlier, obviously, because

14 this is one application of where you're driven down a

15 certain path because of that requirement, where it may or

16 may not be necessary, I guess, in the big scheme of things.

17 But the other part of it is what you design your systems to

18 versus what do you have to make -- to operate them under,

19 too. It seems like that's a subset of this, too, the sense

20 that you want an over design capability to ensure that it

21 can meet even the unsuspected or the unreasonable

22 expectations on it; but on the other hand, you want to be

23 able to eliminate unnecessary regulatory burden, too, and

24 how do you work for that process.

25 MR. SAM COLLINS: I would just ask that we don't

1 continue to agree to disagree. I mean, if there's a  
2 question -- OGC is the office that interprets our  
3 regulations for us. So, I think if you feel like this is a  
4 barrier to getting to where we need to go, then there are  
5 ways to approach that and the agency will provide that  
6 original interpretation, if we haven't --

7 MR. ELLIOTT: We went to OGC --

8 MR. SAM COLLINS: You went to OGC?

9 MR. ELLIOTT: -- and they were in agreement with  
10 the position of the staff.

11 MR. TIM COLLINS: But, we do have a process,  
12 though, to deal with this. I mean, the risk-informed  
13 approach is the way to go on issues like this, you know,  
14 where there's a clear disagreement and it involves judgment  
15 -- a lot of judgment. I mean, the risk-informed approach is  
16 the best way to go. So, that's what we need to head.

17 MR. SAM COLLINS: The risk-informed approach is in  
18 the application, not in the --

19 MR. TIM COLLINS: Well, if you need a change to  
20 the regulation, as well.

21 MR. SAM COLLINS: Then, you have to change -- but,  
22 you do have to change the regulation.

23 MR. TIM COLLINS: Yeah, processes all the way  
24 around.

25 MR. NEWTON: Just a comment I would like to make.

1 The words in GDC could stay the same, if the statement of  
2 considerations reflected the debris generation aspects of  
3 it. That's all we're talking about.

4 MR. SHERON: What we're saying, though, is that  
5 would require a rule change, too.

6 MR. NEWTON: It would require that process to be  
7 exercised.

8 MR. SHERON: Yes, that's right.

9 MR. SAM COLLINS: Are we back to where we are with  
10 that issue?

11 MR. LIBERATORI: Yeah, and we'll communicate it  
12 after some point of context.

13 MR. SAM COLLINS: Okay. Yeah, I think the message  
14 from our end is that we understand where you are. We can  
15 either self initiate a process or you can ask us to initiate  
16 a process. But, clearly, right now, the process has to move  
17 one way or the other, to resolve the last statement here,  
18 the disagreement in --

19 MR. BAILEY: I think the burden is on us right now  
20 to take what you told us and go back and do a summary of  
21 what your concerns are.

22 MR. SAM COLLINS: Okay.

23 MR. LIBERATORI: We initiated this program a  
24 couple of years ago, prompted primarily by experience in  
25 Europe and Japan. As you know, we have a number of

1 objectives, the first one being to establish and maintain an  
2 adequate safety level for all of our Westinghouse plants  
3 and, then, also to proactively develop a systematic program,  
4 which would assess this issue, both short term and long  
5 term. And that had components such as evaluating it  
6 technically and from a safety aspect, doing so in a manner  
7 that would minimize our regulatory risk, also minimize the  
8 cost to the WOG and what's the most cost efficient way to  
9 approach the issue, and make sure we had an integrated  
10 long-term plan.

11           So, we put that whole program in motion.  
12 Considerable resources have been applied to this thing over  
13 the last few years, including a number of lead planting and  
14 very expensive lead plant examinations on site. The site  
15 work that was under the WOG umbrella, if you will, has been  
16 completed and that's, in essence, some of the initial baffle  
17 bolt inspections, as well as remove or replacement programs.  
18 We have bolts from Farley, Point Beach, and Ginna, have the  
19 hot cell. They're in the process of -- well, they're in the  
20 procedure process to be examined. Hopefully, we'll have  
21 some information from those in the not too distant future.

22           In the meantime, we're continuing the analysis of  
23 acceptable bolt and distributions, based on what we learned  
24 from the lead plants. We have grouped all of our plants by  
25 number of loops, whether they're up-flow or down-flow. So,

1 we're kind of plodding through the groupings, if you will,  
2 establishing -- using the accepted methodology and  
3 establishing acceptable bolt patterns that they could use  
4 for their consideration, in terms of any future work.

5 And we're, also, integrating some of the more  
6 generic aspects of the program we initiated with the MRP,  
7 since the MRP does exist now. There is an ITG that's  
8 dealing with the internals issues.

9 MR. BAILEY: What does that acronym stand for?

10 MR. LIBERATORI: Materials reliability project  
11 that, I believe, they've been in to talk to the staff. They  
12 just initiated over the last year one of the -- I believe  
13 there are four major programs they're working on now and the  
14 reactor internals is one of them. So, a lot of the hot cell  
15 work, the funding is actually being picked up by MRP now.  
16 So, we are integrating there, again, making sure that  
17 they're avoiding duplication of effort and the items that  
18 are truly generated -- you know, being treated that way, so  
19 the rest of the industry has an opportunity to see those.

20 This slide, I guess, is somewhat repetitive. But,  
21 basically, we had two lead plants that have completed their  
22 bolt inspection replacements on site. We had an additional  
23 plant do both inspections and did a limited replacement  
24 program within the acceptable bounds of the methodology. We  
25 have another plant that is presently performing bolt

1 inspection on the other Farley unit, but they're doing that  
2 on their own. There's no WOG involvement per se in that,  
3 other than the fact that they're using the WOG program as  
4 the basis for their efforts.

5 MR. GRUBELIC: What sort of results are they  
6 seeing to date?

7 MR. LIBERATORI: In which one?

8 MR. GRUBELIC: The other Farley --

9 MR. LIBERATORI: I don't -- I believe they --

10 MR. GRUBELIC: The original Farley has no  
11 indication --

12 MR. LIBERATORI: Right.

13 MR. NEWTON: The inspection has probably just been  
14 completed and the only word I got back is that it's going  
15 well. I don't have any specifics and I think it's up to  
16 them to tell us what the results are.

17 MR. GRUBELIC: Will they be coming in on this next  
18 meeting?

19 MR. NEWTON: Their results will be included and  
20 they've committed to let us know what the results were. I'm  
21 sure they'll make that known even before the next meeting.

22 MR. LIBERATORI: What's your name?

23 MR. GRUBELIC: Frank Grubelic.

24 MR. LIBERATORI: Thank you.

25 MR. SAM COLLINS: Sam Collins. Roger, have you

1 thought through how to put this information out, at any  
2 given point in time, for industry consumption? Are you  
3 going to go through the industry groups or coordinate to the  
4 Owners Group or --

5 MR. NEWTON: Just about all of the WOG results are  
6 going to be rolled into the EPRI/MRP program. And so it  
7 will be available to the industry through their, you know,  
8 reports and information releases. If you go to the next  
9 slide -- I'm kind of jumping ahead -- we're hoping to meet  
10 with you and bring you up to date. Let Lou go through that.

11 MR. LIBERATORI: This one?

12 MR. NEWTON: Right.

13 MR. LIBERATORI: Again, sometime early next year,  
14 there will be a joint meeting, which will be asking for us  
15 to present the results of where we are in this. Again, the  
16 future work would be to complete the remaining analyses. We  
17 have done all of the strategic efforts, in terms of  
18 identifying the approach, the methodology, how one  
19 determines an acceptable bolt in the pattern. And we're  
20 really into just completing the analysis for the plant  
21 groupings, at this point, and then feeding back any results  
22 that come from the individual hot cell examinations.

23 Some of the two and four loopers that are  
24 down-flow plants are looking at extending leak before break  
25 to smaller sizes, with the intent, saying, you know, what

1 affect does that have on the number of bolts that has to be  
2 replaced. At this point, that's really just an evaluation  
3 phase.

4           Given where we are strategically -- and the  
5 program is, to some extent, winding down, if you will -- we  
6 plan to propose to our members the transition of the baffle  
7 bolting program from a working group directly under the  
8 steering committee, to material subcommittee for a number of  
9 reasons. One is, you know, we do have the involvement of  
10 MRP and a lot of the higher level strategic items. A lot of  
11 the strategic items have been resolved. The objectives for  
12 most of them have been achieved and we're really just into  
13 completion of the analysis. And for the most part, it's the  
14 material subcommittee representatives that are attending the  
15 baffle bolting working group meetings anyway. So, it just  
16 seems like a natural point to just transition this down to  
17 the subcommittee, to basically carry out and complete the  
18 rest of the program.

19           So, that's where we plan to go with that. And I  
20 guess our overall conclusion still is that safety of our  
21 plants have been established and we still believe it's an  
22 aging management issue and that we have a long-term program  
23 in place to feedback inspection results and be able to  
24 manage the issue.

25           MR. SHERON: This is Brian Sheron. You had said

1 this was a MRP/EPRI program. Now, is that -- are there any  
2 restrictions? Because, I know not everyone is a member of  
3 EPRI, so does everybody get this information or it's only  
4 EPRI members that get the information?

5 MR. NEWTON: Do you want me to talk about it?

6 MR. LIBERATORI: Yeah.

7 MR. NEWTON: The program is being classed -- my  
8 name is Roger Newton -- as a category 1 EPRI program. So,  
9 when non-EPRI members need that material, they're able to  
10 buy it and they have an annual requirement to almost buy it.  
11 Anything that comes up as related to safety is classified as  
12 Class One and non-EPRI members are ending up buying that  
13 every year. So, they have access to it. So, it fits in  
14 that category. Most of the information and the long-term  
15 forward plan will probably be in the MRP program and the  
16 WOG, you know, is participating in that, as an active  
17 member, as well.

18 I think that group will then have to figure out,  
19 okay, what's necessary to feed back into the long-term  
20 programs of the utilities, probably more related to license  
21 renewal than to, you know, the current operator. So, that's  
22 a long-term effort.

23 MR. BLOOM: Did we skip over generic district 23  
24 temporarily to include the break time?

25 MR. BAILEY: This program is probably an example

1 of where we took a generic issue that was predominantly one  
2 Owners Group, which took the lead, but they were able to  
3 coordinate it and work it through the industry. At the same  
4 time, that was changing, because the MRP wasn't even in  
5 existence when we started this program and that got formed,  
6 you know, along the way, too. So the issue about how do we  
7 deal with generic issues, this is certainly one example of  
8 how it can be done, but it doesn't work for all issues, as  
9 we know, under ASME.

10 MR. SHERON: Well, this was one that was actually  
11 initiated by the industry, not by the NRC, and we've kind of  
12 -- you know, kind of just sat on the sidelines and  
13 monitored, you know, how you are proceeding with it, without  
14 really, you know, getting involved from a regulatory  
15 standpoint. So, from that standpoint, I think we've been,  
16 you know, fairly pleased on the way you've taken the  
17 initiative on this.

18 MR. SAM COLLINS: What's not clear is the  
19 regulatory issue here, I think, initially, at least, so  
20 certainly, we're interested. I mean, we're monitoring, but  
21 we're very interested. I think the efforts have been very  
22 productive. I'd be curious -- Chris, how would an item like  
23 this be captured into the age related degradation program.

24 MR. GRIMES: My name is Chris Grimes. I'm the  
25 chief of the License, General and Standardization Branch.

1 And it gets captured in the context of the adequacy of the  
2 agent management programs for reactor vessel internals. And  
3 to the extent that we've ended up struggling somewhat trying  
4 to understand the distinction between the Owners Groups  
5 activities, primarily we learned some lessons in terms of  
6 feedback from the Oconee review that literally spilled into  
7 the Calvert Cliffs conclusions, because of a lack of  
8 understanding about how MRP is dealing with the vessel  
9 internals for decals like void swelling, extent of IASEC,  
10 the nature of enhanced inspection techniques. All of those  
11 things are questions that are coming up in the context of  
12 trying to find a theme and a consistency between the owners.

13 Yes, you've -- we'll get into a little bit about  
14 how we've been dabbling in WOG topicals, but not really  
15 developed any conclusions, because all of our energy and  
16 effort have been concentrating on developing findings of  
17 adequate aging management programs for the CE and the B&W  
18 plant. But, that doesn't mean that we haven't continued to  
19 make progress on the Westinghouse work.

20 MR. SAM COLLINS: Okay.

21 MR. LIBERATORI: I've been asked to reverse the  
22 next two items, so I'm going to cover the license renewal  
23 first.

24 MR. GRIMES: For which I'm very grateful.

25 MR. LIBERATORI: Basically, we've had five generic

1 topical reports submitted. Of course, staff reviewed. They  
2 are on the topical status table at the end of the  
3 presentation. But, beginning with the RCSD supports, which  
4 we're up to Rev 2, which was submitted in March of '97. The  
5 initial one was July of '95. In this case, we responded to  
6 two rounds of RAIs and I guess it was under -- it was our  
7 impression that the draft safety evaluation was supposedly  
8 new sign off, but approximately two years ago, and we  
9 basically haven't heard anything yet.

10 The remainder of these have all been submitted in  
11 the '96, '97 time frame. We responded to RAIs here and  
12 responded to additional question on class one piping.  
13 Again, RAI has been responded to, as well as to additional  
14 questions. We've responded to some RAIs on the containment  
15 structure GTR. We haven't had any feedback yet. And on the  
16 reactor internals, we do have additional responses, which we  
17 are working on that we're going to submit, you know, this  
18 month. And I guess we just observed that when we were doing  
19 some project tallying, we've, basically, paid almost  
20 \$335,000 in fees for the review -- for the combination of  
21 reviews here. And we haven't received any SCRs yet and I  
22 guess we'd be curious what the status was.

23 MR. GRIMES: And that status -- first of all, I  
24 apologize. You should have been getting some more cogent  
25 feedback, in terms of what progress we've made. RCS

1 supports SER. Actually, it wasn't very near in November  
2 '97. That was -- that ended up being a trial effort on our  
3 part. That was one of our first attempts at righting a  
4 topical SER for license renewal. And quite frankly, it's  
5 been completely rewritten since that time, to factor in some  
6 of the lessons from the Calvert Cliffs and Oconee's review.

7           You' haven't heard anything, and that's good news.  
8 We haven't needed any further information. But, it, also,  
9 suffers from a lack of schedule driving. Actually, we  
10 suspended work on the Westinghouse topicals in '98 and we  
11 only resumed earnest effort on the Westinghouse topicals  
12 early last year. And that figure looks about right. You  
13 haven't been paying for all of the experimenting we've done  
14 with your topicals, but we have been making progress. I'm  
15 hoping that we'll have some products out here for you very  
16 shortly. But, we're still concentrating our efforts on the  
17 products for the Calvert Cliffs review and the Oconee  
18 review. And now, we've distracted some talent to go off and  
19 do generic aging lessons learned, in response to the  
20 industry concerns about the standards for augmenting aging  
21 management programs. So, you suffered a little bit from  
22 that, too, because we distracted some of the talent that was  
23 working on these safety evaluations.

24           We haven't charged you -- you've gotten more  
25 effort than is reflected in that value, because we have been

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1 working this almost as a fourth, fifth, sixth priority, in  
2 some cases. But, we've been continuing to work it. We  
3 haven't charged you for all the experimenting we've done on  
4 your topical evaluations. But, I will make a point of  
5 making sure that one of those products breaks out of here  
6 soon, so that you'll have some tangible evidence to account  
7 for the investments you've made.

8 MR. SAM COLLINS: Chris, I need to understand  
9 perhaps from both sides here how we define success for this.  
10 I mean, success is to have these reviews complete by the  
11 time that Westinghouse --

12 MR. GRIMES: A time for them to be referenced by  
13 Turkey Point, which will be the first license renewal.

14 MR. SAM COLLINS: Right. So, if we back up from  
15 there, where are we on our schedule?

16 MR. GRIMES: Turkey Point submittals due in 2000  
17 and -- June of 2001, I believe, so long as I get them done  
18 in calendar year 2000.

19 MR. SAM COLLINS: I think -- again, what I'm  
20 asking you is -- perhaps we need to sit down internally with  
21 the benefit of our stakeholders and lay out the schedule for  
22 getting these out and be sure that being in anticipation of  
23 supporting a license renewal, so that the process is one of  
24 instead who is who, what, when. And --

25 MR. NEWTON: We have -- the license renewal group

1 is meeting in the next two days, so this is a subject that  
2 I'll bring up with them. I'm not wanting to guess at Turkey  
3 Point, but they are starting to do their aging management  
4 reviews and topical report approval dictates how you do that  
5 review and what you reference. So, we're running out of  
6 time, to be able to -- for Turkey Point.

7 MR. GRIMES: Unfortunately, so does Gaul and so  
8 does the standard format. Turkey Point told us to work on  
9 Gaul and the standard format, for the topicals; that they  
10 want the topicals, too. So, you know, give me some targets  
11 that you think are realistic, in terms of completing the  
12 topical evaluations, and we'll try and fold them into the  
13 plan and we'll go get some more resources.

14 MR. SAM COLLINS: Yeah, I mean, that's what we  
15 need to do. I mean, it's -- the expectations just have to  
16 be clear and, you know, of course timing is everything in  
17 these. And then we will even budget for it or we'll have  
18 it. And then we'll sit down and go through our internal  
19 processes and find out what the impact is. But, clearly,  
20 there's a startup cost with these. But, if we have external  
21 stakeholders, who are relying on this to do work, then we  
22 need to recoup a little bit and understand better what the  
23 needs are. So, I think that's a short-term issue that we  
24 need to get feedback on.

25 MR. LIBERATORI: The next slide, I think, shows

1 the drivers. We do have several Westinghouse plants  
2 indicating interest in license renewal. They want to refer  
3 that. And, also, the current program we have in place,  
4 which was originally envisioned to be a five- to six-year  
5 program, is -- you know, as a WOG, we're ready to kind of  
6 close that and move on to where we think we need to be,  
7 which is, you know, a supportive role as the applications  
8 actually come in. So, we're at that turning point as a WOG  
9 now, trying to move from the original program to where we  
10 think we need to go.

11 MR. SAM COLLINS: So, Roger, I'm hearing there  
12 will be a meeting in short-term to lay this out?

13 MR. NEWTON: The next two days we'll talk about  
14 this. Chris, we'll get back to you. Really, Turkey Point  
15 needs to be identify their needs. Beyond Turkey Point, we  
16 still want to be able to use these. And there are some  
17 utilities coming right behind them; if they can't use them,  
18 the next ones will.

19 MR. GRIMES: I'm as anxious as you are to try and  
20 bring closure to these. They've, quite frankly, suffered  
21 from a lack of priority, because we're looking at trying to  
22 support milestones that are next week, next month, next  
23 year, to lay more the groundwork for all of the folks that  
24 are now signed up to submit applications in 2001, 2002. You  
25 know, we're now trying to get smart about how we're going to

1 prepare for the bow wave, and issuing the Westinghouse  
2 topicals is, you know, one of the things that we need to do.  
3 We, also, need to -- we've got one more B&W topical to  
4 finish, too, that we need to finish before February of next  
5 year.

6 But, we were, also, looking at -- you know, we put  
7 some more attention on the infrastructure pieces that the  
8 industry as a whole wanted, like the standard format. And  
9 now, I expect we're going to, you know, put a lot of effort  
10 in on Gaul and trying to concentrate on the -- for the  
11 industry, as a whole, which of the programs need to be  
12 augmented for license renewal. Clearly, reactor vessel  
13 internals is an area where there's still a lot of work to be  
14 done between the industry and the NRC, to come up with some  
15 common aging management attributes. There are some subtle  
16 areas in, for example, containment structure, where there's  
17 some details to iron out. We're still trying to resolve  
18 industry questions about how much credit to give for IWE,  
19 IWL, and how far does that go and how much implementation  
20 experience is there -- some of those details.

21 I think the RCS supports -- I'm not going to say  
22 that it's near closure again, because that's what you were  
23 told in '97. So, I'll just tell you, that's the one I think  
24 that's closest to completion and I'll concentrate on trying  
25 to close that one.

1 MR. SAM COLLINS: Okay. As long as you understand  
2 the expectations and we'll go into our planning process.  
3 You know, we'll test it, certainly, but we're going to our  
4 planning process and then Chris's role is to determine the  
5 amount of resources needed to bring that up. We'll make  
6 adjustments.

7 MR. LIBERATORI: GSI-23 closure: I mentioned up  
8 front that we haven't been involved in the meetings with  
9 staff. We discussed the approach to closure of GSI-23. We,  
10 also, made a presentation at the October 1, ACRS meeting.  
11 ACRS did agree with closure of the generic aspects of it,  
12 based on the steps intended to go to look at specific  
13 plants, with respect to risk sensitivity.

14 We, within our WCAPs, as well as our individual  
15 IPEs, have assessed seal LOCA from reactor coolant pumps and  
16 believe, at least for our plants, the core damage frequency  
17 sufficiently low, that the event does not speak of the risk  
18 significance, as far as we're concerned. We do have the  
19 WCAPs still on the table from 1984, the last rev, to 1986.  
20 As a WOG, we're still requesting an SER on that, because a  
21 lot of people have used it for licensing purposes, as well  
22 as their IPEs, and I guess lost in all of this is what the  
23 staff's intent of what that WCAP is, as part of its closure  
24 plan. We were curious, you know, had you come to a  
25 conclusion about how you intend to deal with the WCAP or

1 not.

2 MR. TIM COLLINS: I don't think we thought about  
3 it.

4 MR. SHERON: A resolution of GSI-23, and now that  
5 seems to be a reality, that's a question we have to answer.  
6 But, I don't think we thought about what to do with that  
7 topical report.

8 MR. TIM COLLINS: Yeah.

9 MR. SHERON: We'll get back to you on how we want  
10 to proceed on that WCAP.

11 MR. SAM COLLINS: What's the -- is there a date  
12 certain that you are --

13 MR. LIBERATORI: Well, it represents the  
14 Westinghouse sealed model, if you will, the PRA model, in  
15 terms of the probabilities, as well as the flows, and many  
16 of the members have used those in station blackout. They've  
17 used them in IPEs. So, it's a model that people have used  
18 and it was submitted, again, at that time, for staff review  
19 and concurrence. And it's been tied up in the GSI-23  
20 resolution, basically, for the last 15 years. But, if it  
21 were to not get an SCR, be withdrawn, as an industry, we  
22 have to decide how we want to deal with that, because many  
23 people have used this in a number of different places.

24 MR. TIM COLLINS: It's a complicated problem,  
25 because the closure of the issue doesn't agree with the

1 Westinghouse WCAP. It closes the issue, but it doesn't  
2 agree with the model in the WCAP. So, it's not just like we  
3 put a stamp of approval on the WCAP and send it back saying,  
4 it's been approved as part of the closeout of GSI-23,  
5 because they don't agree. So, it's not just a simple  
6 problem.

7 MR. LIBERATORI: I guess it's our understanding  
8 the staff did use the Westinghouse model as the starting  
9 point for their own work.

10 MR. TIM COLLINS: That was the starting point,  
11 right. But the model -- they, ultimately, issued, as the  
12 research model for Westinghouse, pump CS. It's different  
13 than the one that you've submitted.

14 MR. SHERON: The point is that, you know, we've  
15 never said they're not in compliance with the station  
16 blackout rule.

17 MR. TIM COLLINS: Right; right; right.

18 MR. SHERON: It's our burden, okay, and we  
19 recognize that. If you look at the closeout of 23, it,  
20 basically, says it's our burden; that if we feel that there  
21 are some plants out there that may pose an unacceptable risk  
22 due to pump seal failure, we will analyze them and we will  
23 engage probably those licensees on a plant specific basis  
24 and the like. So, I would probably argue that regardless of  
25 whether or not we've issued an SER or not on that, the

1 burden is in our -- the ball is in our court; it's not in  
2 yours anymore. Your plants meet the regulations.

3 MR. TIM COLLINS: The closeout of 23 says the  
4 station blackout rule is finished, as far as the pump seal  
5 stuff goes. That's the recommendation from Research.  
6 However, this -- the approval of this model, I think, creeps  
7 into a risk informed space now, because it's going to be  
8 used in risk-informed considerations. And if we're not in  
9 agreement for its application in that arena, I'm not sure  
10 where we are. We've still got a little bit of disconnect  
11 here on what this seal model really means and how it's going  
12 to be used in the future.

13 This is not -- the WCAP doesn't address  
14 specifically just station blackout. It addresses a specific  
15 sealed model used for all applications. The closeout of  
16 GSI-23 says station blackout is okay; it doesn't need to be  
17 revisited. But --

18 MR. SHERON: We were hoping that the ASME  
19 committee that is providing the guidance on PRA standard,  
20 you might say, you know, we specifically are asking them to  
21 address the issue of what is the standard going to say  
22 regarding a pump seal model.

23 MR. LIBERATORI: It took a while to get the  
24 flashlight back on. I just want to make sure it doesn't --

25 MR. SHERON: Sure.

1 MR. SAM COLLINS: I guess, Tim, maybe we should  
2 just check to see where this is in the priorities, now that  
3 we have the guidance; look at how this is --

4 MR. TIM COLLINS: Sure.

5 MR. SAM COLLINS: -- prioritized.

6 MR. TIM COLLINS: Sure.

7 MR. DRAKE: I guess I would add one thing. In the  
8 past, we've gone out to individual plants; we've been asking  
9 questions on the seal models that they've been using, for  
10 our WCAP cap, which are really generic in nature. And  
11 instead of asking the individual utilities, those questions  
12 really should be coming back to the Owners Group. Because,  
13 utilities come back to the Owners Group to us and say, hey,  
14 I'm getting these questions on the WCAPs and it's not a  
15 plant specific question, it's a question on our topical  
16 report, and we've had to come back to the staff with those  
17 and say, that's really a generic question; bring it up  
18 generically, don't bring it up in an individual plant. So,  
19 I would ask you to look at that, as you're going after the  
20 individual and assessing the individual plant, as to the  
21 generic applicability of the question you're really asking.

22 MR. TIM COLLINS: You said this has been happening  
23 already?

24 MR. DRAKE: Well, the last -- I've been following  
25 this for the WOG for about 10 years. And going through this

1 three- or four-year cycle, where all of a sudden a couple of  
2 plants get asked questions on the topical report, it comes  
3 back to the analysis subcommittee. We've come down and  
4 talked to the staff on the WCAP. We've explained what it  
5 is. They said okay, they'll get back to us. A couple of  
6 years later, a couple other utilities get a couple more  
7 questions and it's the same cycle. We've made three or four  
8 trips in the last 10 years, basically, on the mall.

9 MR. LIBERATORI: NUPIC/Technical Audit: this was  
10 an evaluation that we helped set up. It was not funded by  
11 the WOG, but, basically, was the NUPIC team doing an audit  
12 of Westinghouse's analytical capabilities, if you will, and  
13 how they process that type of work in-house. The NUPIC  
14 team, those teams tend to be fairly large. In this  
15 particular case, there were 36 people from 24 different  
16 utilities that were involved in this team and what we did do  
17 was solicit the assistance of five technical specialists,  
18 five utility members from our analysis subcommittee to work  
19 with the NUPIC team, you know, strictly from a technical  
20 point of view, not only to assure that they were looking for  
21 the right things, but there was information we wanted to  
22 bring back to the WOG, too, to satisfy ourselves.

23 So, that was held, basically, the first week of  
24 May. And the scope, basically, looked at both the active  
25 large break LOCA models, both the BART/BASH, as well as the

1 Best Estimate Model, and looked at the NOTRUMP small break.  
2 We looked at the process for how internally Westinghouse  
3 deals with 50.46 and the generation of information for the  
4 reporting that's necessary, and, you know, a number of other  
5 items that the audit team was pulling the string on, as they  
6 were going through their audit. So, basically, we tried to  
7 cover the gamut of loss of coolant work within  
8 Westinghouse's shop.

9           And we do have an audit report out. It's  
10 available to us. We, at NUPIC -- again, this was not a WOG  
11 report. You know, given the huge amount of -- almost 150  
12 man -- persons of effort, if you will, we were able to come  
13 up with three findings and one observation, in dealing, you  
14 know, technical primarily with that work, which we thought  
15 was amazingly low. So, as a WOG, we were fairly happy with  
16 what they came out with.

17           Westinghouse is in the process of responding to  
18 all of those items. And the way the WOG is staying plugged  
19 in is those individuals from our analysis subcommittee are  
20 following the response to those issues and providing  
21 oversight on our behalf to the closure of those items. So,  
22 we were fairly pleased with the LOCA work.

23           MR. SHERON: This is Brian Sheron. One of the  
24 things I was curious about, first of all, how many people  
25 were on the audit team and what -- their expertise, I

1 presume, was in like thermohydraulics LOCA and everything?

2 MR. LIBERATORI: To some extent. It was a fairly  
3 varied background. Typically the NUPIC teams are. You  
4 know, we provided the five technical people from our  
5 subcommittee, just to make sure that we had, you know,  
6 direct analytical capabilities.

7 MR. SHERON: That wasn't -- the original concern  
8 on this was that when the industry went out and audited the  
9 vendors, that it wasn't just a paper audit to make sure that  
10 the right dotted lines got signed and everything, but to  
11 make sure that, you know, the technical work was up to  
12 snuff.

13 The other question I had was if -- do the WOG  
14 members, they have this NUPIC audit report on file somewhere  
15 as, I guess, demonstrating their complying with Appendix B,  
16 in the sense that they've gone out and audited their  
17 vendors? So, I mean, if an inspector came out and looked,  
18 they could go into the files and find this NUPIC report that  
19 said that, you know, I've complied with Appendix B?

20 MR. LIBERATORI: It's available to any inspectors  
21 who ask for it.

22 MR. SHERON: Okay.

23 MR. LIBERATORI: Typically, they work through the  
24 quality assurance organizations of the utilities. But, in  
25 this case -- to answer your first question, you know, we did

1 provide five of our most experienced guys from the  
2 subcommittee, who had been involved in analysis for many,  
3 many years, to assure ourselves that we did have the right  
4 technical --

5 MR. SHERON: That was sort of a critical part of  
6 the NUPIC follow-up after the Siemens issue, was to make  
7 sure that the audit teams had the qualified technical people  
8 on them.

9 MR. LIBERATORI: That it was not a paper review.

10 MR. SHERON: Right.

11 MR. LIBERATORI: Exactly.

12 MR. SHERON: When you're all -- I guess you're  
13 telling me you're kind of satisfied that --

14 MR. LIBERATORI: We're satisfied.

15 MR. SHERON: -- what NUPIC is doing is meeting  
16 those objectives and everything?

17 MR. LIBERATORI: That's right. And it was  
18 comprehensive; it was objective. You know, we were pretty  
19 happy with the way it worked out.

20 SPEAKER: This one, in particular. I mean, we've  
21 had the same history with NUPIC audits in the past, where we  
22 didn't necessarily look at those things in depth. But, this  
23 one was in response to the particular audit, as Siemens, to  
24 make sure we did do some of those.

25 MR. RICHARDS: Do you know if Siemens put out a

1 copy of the NRC report on -- or rather Westinghouse put out  
2 a copy of the NRC report on Siemens and did a review of  
3 that?

4 MR. LIBERATORI: Yes.

5 MR. RICHARDS: You said the low number of findings  
6 had some pretty stark contrast to the Siemens report.

7 MR. SHERON: The Siemens report might have been a  
8 wake up call for some vendors.

9 MR. LIBERATORI: I can't speak for what  
10 Westinghouse did between the report and the time we did this  
11 audit, but they certainly have the audit.

12 MR. SAM COLLINS: I guess the question is, in the  
13 audit scope you looked at, the Siemens report determined  
14 what was appropriate to look at and that was taken into  
15 consideration?

16 MR. LIBERATORI: Yes. And that's why we went --  
17 we went right after the models. This was a technical  
18 review.

19 And the last item I wanted to touch on briefly was  
20 -- it's become more prevalent over the last few years to  
21 have staff send us some draft reports for comment. And, you  
22 know, we appreciate that and we want to comment on those  
23 items. But, typically, there's a 30-day turnaround time and  
24 I've listed, I think, the last that we've gotten, that we  
25 commented on, and the 30 days has turned out to be somewhat

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1 tight for us, for a number of reasons. One is we have to  
2 get the comments from the members and consolidate them and,  
3 in some cases, depending on the issue, we may be talking  
4 with the other Owners Groups and NEI and 30 days tends to be  
5 pretty tight.

6 And, also, we have to, as a steering committee,  
7 get some funding in place, because we don't have a slush  
8 fund sitting out there, you know, whether to comment on  
9 draft reports. So, you know, we have to do a little bit of  
10 work to get some funding in place to get that done. And I  
11 guess we were curious whether the 30 days is something that  
12 you've established arbitrary, whether they can be somewhat  
13 flexible in the future to allow us more time -- you know,  
14 provide the comments on these things.

15 I know on the AOV report, you know, we  
16 specifically asked for a delay and you allowed us more time  
17 to comment on it. That one tended to be -- I mean, I think  
18 it was a few inches thick and we need a lot of time to get  
19 through that one. Again, we appreciate the request and we  
20 do want to comment on these things. I just wanted to put  
21 you have a little more time to do it.

22 MR. DEMBECK: My name is Steve Dembeck. I'll  
23 respond. I talked with Research. A lot of these issues  
24 were AEOD items and there was a big backlog and I guess  
25 they're just trying to close them out as quickly as

1 possible. They've told me if you get a particular issue and  
2 you need more time, whether it be 30 days, or 45, 60 days,  
3 whatever, you should just contact the point of contact  
4 listed on that -- on the letter to you.

5 Obviously, we're sending it out for peer review,  
6 therefore, we do want you to give a good thorough review of  
7 the product. And we'll try to work in the future on getting  
8 far fewer of the 30-day request.

9 MR. RICHARDS: Stu Richards. One of the things  
10 we're doing with licensees is we negotiate the -- we  
11 negotiate a date, I guess, and we put it in the letter  
12 saying, hey, we talked to somebody on your staff and we  
13 agree to respond back a certain date. So, maybe we can try  
14 and get -- explore getting more into that mode and, you  
15 know, negotiating what's a reasonable time to get back.

16 MR. LIBERATORI: I know the case of the AOVs, the  
17 date of the actual document from the Brookhaven, I think it  
18 was, was more than a month prior to the date of the letter  
19 requesting us to comment on it. And we found out about it  
20 by receiving -- I, personally, received it in the mail. We  
21 didn't even have a warning that it was coming, and we had 30  
22 days to respond to it. So, we certainly would appreciate  
23 either a heads up or

24 MR. RICHARDS: Sure.

25 MR. LIBERATORI: -- and then the ability to

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1 negotiate is fine.

2 MR. SHERON: This is Brian Sheron, again. I have  
3 periodic meetings with our Office of Research and let me  
4 bring this up and put this on their radar screen and see if  
5 they can -- I mean, if this is common to other Owners Groups  
6 and stuff, rather than just sit there and negotiating all  
7 the time, I think we should just see if we can expend the  
8 period of time to say -- what do you believe is reasonable?  
9 What sort of a date -- I mean, is 45 days or 60?

10 SPEAKER: At least 60 days.

11 MR. LIBERATORI: Sixty is a good time.

12 MR. SHERON: Okay.

13 MR. LIBERATORI: If you can tolerate it.

14 MR. SAM COLLINS: I think that's reasonable. We  
15 take -- study 10 years worth of data and 60 days to review.

16 MR. LIBERATORI: Okay. I have WCAP tables. If  
17 you recall about a year ago when we were down here, I think  
18 this first table was some 15 item or so long. And we're  
19 very pleased with the progress we've made with the staff on  
20 getting SCRs out and in some of the cases, we've gone back  
21 and looked and withdrawn a few. So, we've been able to  
22 scale this list down to -- right now, essentially, it's just  
23 three.

24 The post-accident sampling WCAP, which we  
25 discussed earlier, the break opening one, which is still on

1 the table from a generic perspective, and the RCPC WCAP we  
2 just spoke about a few minutes ago. And then separate from  
3 that, we have -- we have still listed the five license  
4 renewal WCAPs separately at this point. And we're just  
5 carrying dates, as last we received them, but we understand  
6 -- you know, we'll be talking about those.

7 Right now, that's all we have on the table  
8 already.

9 MR. SAM COLLINS: Do we need to focus on any of  
10 these, other than we've already discussed, Lou?

11 MR. LIBERATORI: I think we talked about all of  
12 them.

13 MR. SAM COLLINS: Okay.

14 MR. LIBERATORI: The next sheet shows some  
15 anticipated -- the next year to year-and-a-half. This first  
16 one, the ASICS replacement modules for the protection  
17 systems is a subgroup effort. Within the WOG, a subset of  
18 utilities can get together and work on something separately.  
19 So, this is not a generically funded WOG program, but it is  
20 one of our subgroups. And that subgroup does plan to come  
21 in, in the first quarter, sort of carry them on the table  
22 here. And we have a number of generic programs here, mostly  
23 dealing in the risk-informed area.

24 The logic and reactive chip AOT and STI extensions  
25 is really an outgrowth of some of the programs we've had

1 ongoing that you've issued SCRs on this. This was a  
2 follow-up phase to some existing programs.

3 The risk-informed ATWS, we've had some several  
4 meetings over the last year on that and, you know, we  
5 believe they were commonly headed in the right direction on  
6 that. And we plan to have that in the middle to third  
7 quarter of the year. And the remainder of these are  
8 risk-informed AOT extensions that we're working on in-house,  
9 as a WOG, and we're, also, looking as to how that gets  
10 integrated with the overall industry effort on risk-informed  
11 tech specs. These here are pieces that we're working on  
12 that, at least at the current time, we plan to come in with  
13 WOG submittals for.

14 MR. SAM COLLINS: Are any of these going to have  
15 lead plants with them or are they going to be --

16 MR. LIBERATORI: I don't -- I'm not sure. South  
17 Texas has stepped up for a number of these, but I don't have  
18 that breakdown at this point.

19 MR. SAM COLLINS: They had their list of  
20 exemptions, as you know, that they've come in for.

21 MR. LIBERATORI: Right.

22 MR. SAM COLLINS: Okay. So, I guess we would ask  
23 you to put those together.

24 MR. LIBERATORI: No, they are -- Wayne Harrison,  
25 South Texas, happens to be the Chairman of the Licensing

1 Subcommittee; so, clearly, this engagement there.

2 MR. SAM COLLINS: Okay. Because, that  
3 reconciliation would help us plan our resources, as far as  
4 what we're already focused on and, clearly, South Texas is  
5 looked at as more or less a pilot for option two for  
6 risk-informing Part 50.

7 MR. LIBERATORI: We're still framing our strategy  
8 on that, as well.

9 MR. SAM COLLINS: Okay. It might be -- Brian, you  
10 can decided, but we might want to consider once you do that,  
11 sitting down at a meeting and ensure that we have these  
12 parceled out correctly, not only externally with the Owners  
13 Group, but internally. Because, Part 50 would drive -- if  
14 there are separate licensing actions, then they need to be  
15 prioritized.

16 MR. LIBERATORI: We need to integrate with the  
17 other Owners, as well.

18 MR. SAM COLLINS: Okay.

19 MR. SHERON: For the most part, we look for in  
20 plant, you know, for the submittal.

21 MR. LIBERATORI: But, that was a shot, that's what  
22 our crystal ball says now.

23 MR. SAM COLLINS: Okay.

24 MR. WALL: I presume that the WCAPS on AOT and STI  
25 will contain some quantitative risk evaluations. I got some

1 indication earlier that they were going to be qualitative,  
2 but I -- you know, the CI submittals, for instance, we were  
3 presented with a 15 x 12 matrix as results, and I don't know  
4 it should go that far, but I don't think we can make sound  
5 judgments, even with lead plant, based only on qualitative  
6 information, if that was the intent.

7 MR. LIBERATORI: I understand your comment. We  
8 don't have representatives of the licensing subcommittee  
9 here today, so I don't want to directly respond. But, I  
10 understand the comment.

11 MR. WALL: My name is Miller Wall, if you didn't  
12 hear it.

13 MR. LIBERATORI: Any other comments?

14 [No response.]

15 MR. LIBERATORI: Okay. Back to you, if you've got  
16 anything else, at this point.

17 MR. SAM COLLINS: Okay.

18 MR. SHERON: I've got a couple of items here I've  
19 got to kind of just put out on the plate. One is, last  
20 week, we had a workshop in Chicago, which was noticed and  
21 everything. It was on voluntary industry initiatives. Do  
22 you all have any -- we only had 11 people show up and I  
23 don't know whether it was just because of lack of interest,  
24 or everybody is just totally so happy with voluntary  
25 industry initiatives, you have no comments on it.

1           We were -- it was kind of a double-edged sword.  
2           When I talked with my staff, I wasn't personally there, but  
3           I talked with Jack Strosneider, and he said, well, the bad  
4           news is that only 11 people came; the good news is we had a  
5           great conversation there, and the like. So, I was just  
6           wondering what your -- whether or not you had somewhere  
7           there; where you're coming from on this issue?

8           MR. LIBERATORI: I guess I need to apologize. We  
9           had worked among ourselves. We had a number of conflicts  
10          and we did designate -- have designated someone from the  
11          steering committee to attend that meeting. And at the last  
12          moment, the day before the meeting, something came up with  
13          the utilities, so he couldn't attend, and we just didn't  
14          have time to react to send another person there.

15          MR. SHERON: But, I mean --

16          MR. LIBERATORI: We had every intention of having  
17          an individual there.

18          MR. WALSH: I was at the July one out in Chicago  
19          and we intended to be at this one, but it just so happened  
20          we had a conflict.

21          MR. SHERON: Should we schedule another one or is  
22          there -- I don't know how --

23          MR. SAM COLLINS: Do you have issues you feel you  
24          need to present to us that aren't already on the agenda?

25          MR. NEWTON: I was going to ask how the meeting

1 went and what came out of it; that -- you know, you said  
2 good discussions. Are there key points that are new or  
3 definite to the --

4 MR. SAM COLLINS: Did we transcribe the meeting?

5 MR. SHERON: Yes, it was transcribed. There's a  
6 transcript somewhere. The ones I had heard about actually  
7 focused in on -- there was a lot of revelations on fees that  
8 were being charged and the like, and people were going, gee,  
9 I didn't know we were getting charged with that. And, you  
10 know, I told one of the staff, I said, you know, I think we  
11 ought to take the whole fee thing and give it to the  
12 industry and say, you know, our budget is so much, you  
13 figure out how much. Because, they didn't realize that for  
14 some generic reports that were being submitted, how they  
15 were being charged, whether they were being put in the  
16 general fee base or people saying, gee, you know, I'm a PWR;  
17 I will talk to BWR and sort of pay for that. So, I'm not --  
18 that's my understanding as how the conversation went.

19 MR. BAILEY: Do you all have guidelines on how you  
20 make that determination for meetings; for example, whether  
21 you -- how you consider they're generic versus not generic  
22 or whether you charge or not charge?

23 MR. DEMBECK: Yeah. This is Steve Dembeck. The  
24 basic rule is if it's related to an application you submit,  
25 then we bill you for that; if it's an informational meeting

1 like this, meaning we don't bill you for that.

2 MR. SHERON: Well, this wasn't for the meeting,  
3 itself. This was just for how we review -- for example,  
4 voluntary industry initiatives, when the industry submits a  
5 topical report, you know, Howard gets charged and  
6 everything. So -- anyway, I was just more or less curious  
7 whether or not we should --

8 MR. LIBERATORI: I'll just make an observation  
9 that, you know, at some of the industry meetings we intend,  
10 there seems to be more interest than what the fees are being  
11 charged for and the amounts of the fees. You know, we talk  
12 about license renewal a little bit here; but on some of our  
13 other programs, we've seen what we think maybe is increased  
14 fees over what we've been used to in the past, in terms of  
15 staff review of WCAPs and items, to the point where, you  
16 know, what we pay for the fees on the reviews is a  
17 significant percentage of what we pay for the product in the  
18 first place. So, we have seen some tendency in that  
19 direction and I think the other Owners have, as well.

20 MR. SAM COLLINS: Okay. That's -- we intend to  
21 discuss that topic at the regulatory information conference,  
22 to have a session on fees and billing, so that would be  
23 appropriate. But, clearly, any specific examples you have,  
24 we should use those as cases, because essentially the staff  
25 level is going down.

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1           The level of effort, as part of our planning  
2 process -- we have what amounts to be labor rates for our  
3 practices and we monitor those. I mean, some are higher  
4 than others, but we do monitor those. Part of work planning  
5 center is going to be to establish the baseline for those.  
6 So, we intend to improve as a learning organization. But, I  
7 mean, if there's a perception there that there are some  
8 outlines, please bring those up and we'll take a look at  
9 them specifically for lessons learned.

10           MR. BAILEY: Did any participate in the workshop?

11           MR. SHERON: Yeah, they were in the count. I  
12 think -- let's see -- I think Alex Marion was there and Mike  
13 Tuckman from Duke was there, and I think there's one other  
14 from the industry; I can't remember the name.

15           MR. LIBERATORI: As an example, I think, just  
16 recently we received a bill for the ACRS meeting on the PASS  
17 elimination. I guess now, is that -- we were a little  
18 surprised at that, but is that within the guidelines?

19           MR. DEMBECK: Well, the ACRS was given a couple of  
20 tax to care for that. But, really, what happened there was  
21 the invoice you received basically grouped everything  
22 together. The ACRS part was eight hours and I believe that  
23 will was over 5,000 dollars.

24           MR. DRAKE: Eleven thousand.

25           MR. DEMBECK: Eleven thousand. That's over 5,000.

1 So, the ACRS part of that was actually a small part. But,  
2 I'm looking into that further and we'll get back to you on  
3 that. But, it just --

4 MR. LIBERATORI: So, we should work with Steve?

5 MR. DEMBECK: Actually, every invoice sent to you  
6 have has Ellen Poteat's name and number on the right-hand  
7 corner of the invoice. You're, obviously, welcome to call  
8 her, as the first step. You can deal with us, also,  
9 whichever is most convenient to you.

10 MR. SAM COLLINS: I'm not sure I understand the  
11 message. Should we have billed for the ACRS, in that  
12 manner?

13 MR. DEMBECK: It depends on -- I'd have to look  
14 into what ACRS's role was.

15 MR. SAM COLLINS: ACRS is voluntary. They set  
16 their own agenda.

17 MR. DEMBECK: Correct. My gut feeling is they  
18 shouldn't be.

19 MR. SAM COLLINS: Right.

20 MR. DEMBECK: But, I'd have to see -- I'd have to  
21 see why NRR gave them -- what the charge is here. I'm not  
22 sure why we did that.

23 MR. SAM COLLINS: Okay. I think we have to go  
24 careful with some of the initiatives we have internally that  
25 are optional. I mean, there were normal processes, clearly.

1 That's part of overhead. But, when some of the processes  
2 are optional, I think we have to understand some manner of  
3 discipline. We're learning this all the time of how we deal  
4 with those; so, clearly, put those on our plate, because  
5 some of them may be transparent to us, until they come in  
6 front.

7 MR. LIBERATORI: That's fine. We appreciate the  
8 opportunity.

9 MR. DRAKE: Feedback on your meeting, I don't  
10 think it was publicly noticed that same way it typically  
11 was. I think the way it was publicly noticed, it kind of  
12 buried a little bit. And the other thing, it conflicted  
13 with the water reactor safety meeting, which was the exact  
14 same week, the exact same day. So, you had people that --

15 MR. SHERON: My question is do you think another  
16 workshop, you know, that was, say, better noticed and a  
17 little more, would that be worthwhile for you to have?

18 MR. DRAKE: Yeah.

19 MR. SHERON: All right. Let me take an action. I  
20 will talk with our Division of Engineering, which sponsored  
21 it, and what I may ask them to do would be to contact a lot  
22 of the stakeholders and to see if they could come up with  
23 maybe a mutual date and have another workshop on that.  
24 Because, I think we're a little concerned that we didn't  
25 have enough people there and we don't want to go forward

1 with this program and all of a sudden get a flood of letters  
2 says, you know, what are you guys doing.

3 Another item I had was that -- and Sam said, you  
4 know, we're starting with our work planning center, and one  
5 of the things we're doing is, in our budgeting process, is  
6 we're becoming very well -- I won't say "very," but more  
7 sophisticated, okay, in the sense that we project a number  
8 of licensing actions that we will receive in the course of  
9 the year. And we set our goals and we have labor rates and  
10 everything. We can, basically, go back and historically  
11 look and say, how many staff hours does it take to process a  
12 licensing action. Depending upon, for example, its  
13 complexity, there can be easy ones, average ones, hard ones,  
14 and each one has a various labor rate.

15 And one of the things we just accomplished in the  
16 past fiscal year was we actually met our goal of processing  
17 over 1,700 -- 1,670 licensing actions. It's a fair amount  
18 and we're getting out backlog down. But, as we do our  
19 planning process, one of the things we've done is we've sent  
20 out a letter in May -- I believe you all got one -- which  
21 really asked, on a voluntary basis, if you could project how  
22 many licensing actions each utility plans to submit in the  
23 coming year and the coming two years, I believe it is.

24 The reason is that helps us in our planning, okay.  
25 And I just got some feedback from the staff, to find out

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1 where we were with that. And it was sort of a mixed  
2 reaction, where some utilities were fairly responsive;  
3 others, it was like, we don't know. And I think once we got  
4 beyond one year, it was anybody's guess. And that may very  
5 well be the case, okay; but, I would just kind of put out  
6 that it's important to us for our planning and our  
7 budgeting, okay, because what I worry about is that if we  
8 don't have accurate estimates coming in from the licensees,  
9 then we just have to take sort of a rule of thumb and say,  
10 well, this is what we think it's going to be, based on a  
11 number of factors, okay.

12 And I was worried that, for example, you know, if  
13 we -- for example, this year, I think we're budgeting 1,500.  
14 You know, and if I see, you know, 2,000 come in, okay, I  
15 don't have the resources. And I don't want licensees to  
16 come in and start screaming and saying, you know, we're off  
17 getting our licensing actions processed, because Sam said,  
18 you know, we've got license renewal. We've got to look for  
19 resources for that. You know, so it's very tight budgeting,  
20 you know, to the point where we're down to one or two FTE  
21 almost.

22 MR. BAILEY: Did you request that information from  
23 the Owners Group or only to utilities?

24 MR. SHERON: To utilities. It went out to each  
25 utility and it basically -- it goes out -- we try and send a

1 letter out every May, with something like a 60-day response  
2 time, and that way it helps us in our next year budget. I'm  
3 only bringing it up, because to emphasize the importance in  
4 our process, okay. And I think in the long run, it helps  
5 you, okay, because, then, we know better what we can -- what  
6 services we can provide in our schedule.

7 MR. WALSH: It's Larry Walsh speaking. One of the  
8 complications we're having in this issue is the deregulation  
9 process, causing financial partner changes, which force  
10 license amendments because of the financial situation. I  
11 know our licensing manager, about 75 percent of his work is  
12 tied up with new owners, just putting them on the docket as  
13 being owners. And the technical work is beginning to slip  
14 backwards, because we don't have -- the project manager just  
15 can't handle the interface. It's just so many things going  
16 on.

17 MR. SHERON: That's one of the areas. I'm not too  
18 sure that we're all going to be subject to deregulation.

19 MR. SAM COLLINS: It's a different kind of work  
20 load.

21 MR. SHERON: Yeah.

22 MR. LIBERATORI: But, I'd be glad to carry the  
23 message back. And indirectly, it, also, affects our  
24 collective WOG progress, as well.

25 MR. SHERON: I recognize you can't predict

1 everything; but to the extent that you can really give us  
2 some more -- you know, the most accurate estimate you can, I  
3 think helps both organizations, both industry, as well as  
4 the NRC, in the long term.

5 MR. SAM COLLINS: We're going to talk a little bit  
6 about this at the regulatory information conference, when we  
7 talk about our licensing issues that John Zwolinski is  
8 focusing on. But, we're going down the path of measuring  
9 these products and, of course, maintain safety is always  
10 first. But, after that, we may very well ask the industry  
11 to provide for outcome measures with these submittals, you  
12 know, what is the reduction of burden; what is the schedule  
13 for efficiency and effectiveness for the NRC to operate  
14 with; is there stakeholder involvement -- those such of  
15 things.

16 And, you know, I think there's a forum to discuss  
17 that. And as a business, having eliminated the majority of  
18 the backlog and being on a four-and-a-half to five-month  
19 turnaround average now, I believe that there's a role,  
20 whether it's at the CEO or the operating officer, the  
21 license manager operator level, to say, you know, what is --  
22 what are my expectations when I submit this licensing  
23 amendment; is the licensing department measuring these the  
24 same way the NRC is measuring these. Maintain safety is a  
25 given. But, are we prioritizing our submittals to the NRC,

1 based on some common understanding, how the NRC prioritizes  
2 its work. We need to discuss that. But, I think there is  
3 room, everything else being equal, to maintain safety to be  
4 predominant for looking at how much burden will this reduce  
5 and you want us to work on this much burden reduction or  
6 this much burden reduction, and is that being focused on --  
7 by the licensees, in the same way it's been focused on by  
8 the NRC.

9 MR. SHERON: The last item I just had was on the  
10 weather related NOADs. This is sort of my reaction from  
11 last summer. Granted, we had kind of a strange summer with  
12 the heat and everything, but were very concerned about, you  
13 know, the fact that the grid was really being stretched and  
14 we were concerned that, you know, plants were going to come  
15 in with NOADs. We had staff standing by. We have some of  
16 our projects people, it think, with beepers on and the like.

17 My question, when it all kind of settled down,  
18 was, gee, you know, when I look at the NOADs that come in --  
19 you know, our lake level is two feet below where it's  
20 supposed to be in our tech spec or the ultimate heat sink  
21 temperature went two degrees above where it was supposed to  
22 be and the like, and, typically, they come in and there's  
23 always an argument as to why the plant is still safe -- and  
24 so I ask the staff, I said, well, gee, if the plant is still  
25 safe, why are we yanking everybody's chain, not only the

1 licensees, but the staff, having people come in on weekends  
2 and everything?1 And in our leisure, in the off season you  
3 might say, you know, can't we request changes to tech specs,  
4 such that we don't get into this business; that we know that  
5 the plant is safe, even though that ultimate heat sink went  
6 up three degrees? Can't we submit a tech spec change?

7           And then maybe it's risk based, okay. I mean, I  
8 understand that you may not be able to do a calculation, for  
9 example, you know, that shows if everything is in its worst  
10 condition, that you can still meet some licensing grace.  
11 But, you know, in this risk-based, you know, environment  
12 that we're really advocating, it may be possible to show  
13 from a risk standpoint that you can go there, okay, because  
14 other parameters may not be at some worse condition, all  
15 right. But the whole idea was -- is to try and anticipate  
16 where we think these weather related NOADs may go, you know,  
17 and let's see what we can do to change the licenses, so that  
18 we don't get into this crisis mode that we get into in the  
19 middle of the summer and, you know, on Friday night, you  
20 know, on July 4th, or something and the like.

21           So, I've kind of been asking the industry to take  
22 a look at that and see is there's something we can do, you  
23 know, to save, you know, from us going into the crisis mode  
24 from both sides.

25           MR. LIBERATORI: We can certainly do that. My

1 personal recollection was we were there in the late '80s --  
2 I'm trying to remember -- I think it was 1988, we had a very  
3 hot summer and a lot of utilities were in exactly that  
4 position then. And I know many of them, mine being one,  
5 going back and reanalyzed in the off season, the ultimate  
6 heat sink increases and put those in place. Now, I know,  
7 personally, we haven't challenged the new limit we  
8 established. But, if other utilities are starting to  
9 challenge where they went, based on the last '80s, then  
10 certainly they should look at it again. I'm just not in a  
11 position to say right now, but we certainly can bring that  
12 message back. You know, we may be there; we may be  
13 challenging what we thought was enough room then.

14 MR. SHERON: Plus, I see with the deregulated  
15 environment, in the sense that I think that the reserves are  
16 going way down and the like, so there's going to be a lot of  
17 pressure to keep plants on line during these hot months and  
18 everything.

19 MR. LIBERATORI: Typically, what will happen, too,  
20 is that, you know, depending on where you are, it may change  
21 with the tide, so, you know, you are in noncompliance and  
22 then six hours later, you're in compliance. But, in the  
23 meantime, you're taking action, because you are out of  
24 compliance, and by the time you've done that, you're back in  
25 compliance again. So, you can cycle the plant, as well.

1 MR. SHERON: So, I'm just saying is, you know, I'm  
2 looking at this as something that may not go away, okay,  
3 and, therefore, maybe we should start to think about how we  
4 can address it, so we don't get into these last minute  
5 efforts in the middle of the summer. That's all I have.

6 MR. SAM COLLINS: Maybe we can go around the table  
7 and see if there are any other issues. Steve?

8 MR. DEMBECK: No. Ii have no more issues.

9 MR. TIM COLLINS: No more.

10 MR. SAM COLLINS: Any staff -- NRC staff issues?

11 [No response.]

12 MR. SAM COLLINS: Should we go over the items we  
13 have?

14 MR. DRAKE: We talked about your resource  
15 planning.

16 MR. SAM COLLINS: Yes.

17 MR. DRAKE: I believe we had talked about, when we  
18 submitted topical reports from the industry that were -- I  
19 think you used the word "foundation-based issues," where --  
20 you know, like our break open, it really doesn't need a lead  
21 plant. It looks at the foundation of the break opening.  
22 And is the resource planning process going to include some  
23 allocation to deal with these foundation issues?

24 MR. SAM COLLINS: They are prioritized. We  
25 determine them when we go through the rack up. Where they

1 stack up against the plant specific kind of depends on the  
2 priorities. But, clearly, I think you budget so many  
3 generic topical reviews per year.

4 MR. SHERON: Yeah. And, again, as part of the  
5 planning process -- and it may be even worthwhile -- I don't  
6 think we sent letters out to the Owners Groups. I think we  
7 sent out letters to the individual utilities. It maybe  
8 worthwhile when we send out letters, to send them out to the  
9 Owners Group and ask to get a feel for what topicals, just  
10 like, you know, are coming in. Because, we budget for so  
11 many topicals and if we see more than what we budgeted for,  
12 then, obviously we get the backlog and then we put them on  
13 your list.

14 MR. SAM COLLINS: Ask you to prioritize them, too,  
15 would be an input to that.

16 MR. SHERON: Yeah.

17 MR. BAILEY: We tried to do that, as part of this  
18 meeting for the next year, but we haven't gone two years  
19 out, I don't think, yet, and maybe we need to do some of the  
20 work there.

21 MR. SAM COLLINS: Yeah. Good. And, again, if it  
22 appears like there's a difference of view or sensitivity,  
23 then that's what these meetings are for.

24 Let me see, who has been keeping score? Steve,  
25 you've been doing that?

1 MR. BLOOM: I was trying. It didn't seem like it  
2 really -- the only one I found really was the one on GI-23  
3 and WCAP. We have to figure how we're going to handle that  
4 one in the future; how we're going to reopen that, take it  
5 out of the hole. And I guess in doing so, we have to come  
6 back with what they would want as a realistic goal; when  
7 their SC would be one SC; how short term, long term we want  
8 it, since it has been one of those that hasn't really had a  
9 due date for a while.

10 MR. SAM COLLINS: Okay, I have a few here.

11 MR. DEMBECK: Check on the charges related to the  
12 ACRS.

13 MR. BLOOM: Right.

14 MR. DRAKE: Brian is going to talk to Research  
15 about 60 days.

16 MR. DEMBECK: Right.

17 MR. SHERON: And then we still got the IOU on the  
18 containment sump issue, with regard to your -- I think that  
19 was your action, actually.

20 MR. BAILEY: On the GDC-4 issue and whether we  
21 wanted to ask for a rule change, that's in our court, to  
22 come back and make a proposal, if that's what we think we  
23 want.

24 MR. SHERON: But, I think the other question was,  
25 is that you had to comment that the NRC research program

1 that does not adequately --

2 MR. BAILEY: Right.

3 MR. SHERON: -- address PWR to regeneration.

4 MR. BAILEY: Right.

5 MR. DEMBECK: And I think Rob said he was going to  
6 research that.

7 MR. JACOBS: That's in writing already.

8 MR. BLOOM: Right. So, Rob said he had to look at  
9 your letter and see how to respond to that. So, he had to  
10 go Research about getting a copy of that letter.

11 MR. DRAKE: We do have an action to get back to  
12 you on the license renewal topical reports.

13 MR. SAM COLLINS: Right.

14 MR. LOUNSBURY: I did talk to John Craig. I have  
15 been following this for the WOG, and one of the concerns  
16 that I have, and I've expressed this to John, was not only  
17 did the 105.41, the WCAP, there's a lot of other issues out  
18 there relating to station blackout, plant specific  
19 commitments, and other regulations that was waiting for this  
20 thing to close. The question that I posed is, like, how are  
21 you going to make sure that you're going to close the loop  
22 on all of these other things that were linked to this  
23 closure? They're not really sure what is really linked to  
24 that closure. I mean, just -- you follow what I'm saying?  
25 Just closing GSI-23 is that you've got them off the books.

1 There's a lot of commitments and a lot of regulations out  
2 there waiting for this thing to close. I don't think they  
3 have a very good accountability about what's involved after  
4 the close.

5 MR. BLOOM: Are you talking about other --

6 MR. LOUNSBURY: No, I'm not talking about -- I'm  
7 talking about other regulations, other plant specific  
8 commitments that were waiting for GSI-23 closure, before  
9 they do things in station blackouts, etc.

10 MR. TIM COLLINS: Station blackout is explicitly  
11 addressed in the GSA-23 closure. Now, as far as other  
12 commitments, I don't know if there are other generic --  
13 there are other specific regulations that have a hook on  
14 GSI-23. Station blackout clearly had a hook on it, you  
15 know. But, I don't know of other regulations, as a whole,  
16 that have a hook on GSI-23.

17 MR. SHERON: Are you -- let me ask a question:  
18 are you familiar with any of these?

19 MR. LOUNSBURY: The ones that I was -- obviously,  
20 the station blackout. The other one was plant -- there may  
21 be plant specific commitments that were waiting for GSI-23  
22 closure; that they had to take some sort of action or not  
23 action. And I'm not aware of any others, but I just really  
24 ask the questions.

25 MR. SHERON: But the closure of 23, okay,

1 basically says there is no plant specific actions or generic  
2 action. I mean, we already said there was no generic action  
3 required. The closure, basically, says there is no plant  
4 specific action that is being implemented, at this time,  
5 based on the closure. So, I mean, from the standpoint that  
6 there are some plants that have, you know, an open item that  
7 says I've got to do something depending upon, they don't  
8 have to do anything. That's what I would -- that's how I  
9 would interpret it. Don't call us; we'll call you.

10 MR. LOUNSBURY: But the point being is that there  
11 were a lot of things that they -- this is early on in the  
12 discussion, back in July, we started -- we were approached  
13 by the NRC about helping them close GSI-23. There were  
14 certain things that surfaced that was more linked to this,  
15 than just closing GSI-23.

16 MR. SHERON: But part of the closure, though,  
17 there's a follow-up action plan after the generic issue is  
18 closed, but the Office of Research is continuing to do some  
19 plant specific studies. Because, as part of the closure,  
20 they had done some clarification of risk-related and some  
21 other sequences, aside from station blackout --

22 MR. LOUNSBURY: Right.

23 MR. SHERON: -- loss of component cooling water.  
24 And as a result of those analyses, the risks that they were  
25 calculating were high enough to consider that we needed to

1 look at maybe some plant specific situations, to see if  
2 there was a need for action. But, there is no specific  
3 actions called out with the closeout of GSI-23, other than  
4 to pursue some plant specific studies.

5 MR. TIM COLLINS: Right. Well, related with  
6 GSI-23 closures is also GSI-9 and GSI-65.

7 MR. SHERON: Okay. I've drawn a blank on what 9  
8 and 65 do.

9 MR. TIM COLLINS: Sixty-five specifically is the  
10 component cooling water.

11 MR. SHERON: Okay. Component cooling water, there  
12 are follow up studies being done on component cooling water,  
13 as far as -- the generic 23 is being closed and there's some  
14 specific plans, which will be analysis for plant specific  
15 vulnerabilities, relative to component cooling water. Okay,  
16 so that's 65 -- that was 65 or 90.

17 Okay. And what is nine?

18 MR. TIM COLLINS: I can't remember off the top of  
19 my head.

20 MR. LIBERATORI: I think the individual utilities  
21 could deal with that.

22 MR. SAM COLLINS: I think what we may need to do a  
23 sweep of the WISP system, to see if there's any pending  
24 actions. But, clearly, I think in the way we disposition,  
25 too, once we get through ACRS comments and all. As Brian

1 indicated, we'll send a message of whether we have further  
2 expectations for plant specific actions. So, we just need  
3 to take it under advisement on how we communicate.

4 MR. BAILEY: Sam, going back to the action item  
5 for the license renewal topical, we have an action to --  
6 after our meeting next week, to get to you with the dates we  
7 need. But, I think as a joint action, we need to finalize  
8 firm dates for issuing those topical together.

9 MR. SAM COLLINS: I agree with that. Yeah, I  
10 think that's predicated on the needs for Turkey Point. But,  
11 there may be a specific meeting between the driver, which I  
12 think is going to be Turkey Point in this case, and the  
13 license renewal staff to go over the schedule and then we'll  
14 adjust that.

15 We had -- we just talked about the WCAP on the SER  
16 and the WCAP on RCPS, containment sump, risk-informed  
17 approach guidance. I think we talked through that, right?

18 MR. TIM COLLINS: Right.

19 MR. SAM COLLINS: All right. LOCA analysis, I  
20 think we're looking at a meeting early 2000 to review the  
21 status. Is that what I heard?

22 MR. BAILEY: Yes.

23 MR. SAM COLLINS: The next action: AOV industry  
24 initiative, I think we talked about industry initiative  
25 versus commitment on that. And is that tied up in the --

1 MR. SAM COLLINS: Okay. And we talked about the  
2 additional workshop on voluntary industry initiatives.

3 MR. DRAKE: I guess the understanding is -- the  
4 term "industry initiatives," in your context of voluntary  
5 versus how we're using it, we don't -- I mean, the AOV  
6 program document is a guidance document to our members, to  
7 use as they see fit. It's not a voluntary initiative that  
8 we're saying to the industry, we're doing this. We provided  
9 them a reference document to use as they see fit.

10 MR. SAM COLLINS: Right.

11 MR. DRAKE: So, we don't see it falling into how  
12 -- into your voluntary initiative bin, at least from our  
13 perspective. You have to put it in that bin.

14 MR. SAM COLLINS: Well, I understand and your  
15 point is correct from where you sit. From where we sit, we  
16 say, what is the industry doing. Well, if they're following  
17 Westinghouse Owners Group guidance or INPO guidance --  
18 there's a lot of ways to get to the means to an end --- then  
19 the staff has to understand that that guidance document  
20 that's being used, whether it's an Owners Groups document  
21 nor not, provides sufficient basis for the staff not to take  
22 generic action. That's kind of how they cross over I guess.  
23 Is that right, Brian?

24 MR. SHERON: Uh-huh.

25 MR. SAM COLLINS: As I see it.

1 MR. BAILEY: Yeah, that was kind of the comment I  
2 made early on, is what were your expectations on what you  
3 thought the industry was doing with the document versus what  
4 we're doing or not doing.

5 MR. SAM COLLINS: Right.

6 MR. BAILEY: That, I think, is the open end item  
7 right here on AOVs, because I'm not sure we've gone far  
8 enough to -- for you to decide to know exactly where we're  
9 going yet.

10 MR. SAM COLLINS: Right. Okay. Any other topics?  
11 Lou? Jack?

12 [No response.]

13 MR. SAM COLLINS: All right. Did we get to where  
14 we needed to go?

15 MR. BAILEY: Yeah, that was a good discussion on a  
16 number of items.

17 MR. SAM COLLINS: Okay. Very good. That closes  
18 the meeting, then?

19 MR. BLOOM: That closes the meeting. Thank you,  
20 very much.

21 MR. SAM COLLINS: Thank you.

22 [Whereupon, at 11:21 a.m., the meeting was  
23 concluded.]

24  
25

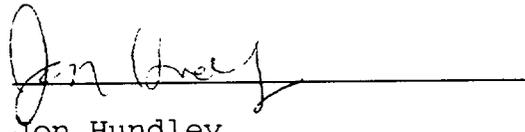
REPORTER'S CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission in the matter of:

NAME OF PROCEEDING: MEETING

PLACE OF PROCEEDING: Rockville, MD

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.



Jon Hundley

Official Reporter

Ann Riley & Associates, Ltd.