

February 11, 2000

MEMORANDUM TO: Cynthia A. Carpenter, Chief
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

FROM: Dennis P. Allison, Senior Reactor Systems Engineer/**AR**/
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: NOTICE OF PUBLIC MEETING ON PROPOSED CHANGES TO EVENT
REPORTING REQUIREMENTS IN 10 CFR 50.73 AND ASSOCIATED
GUIDANCE

DATE AND TIME: February 25, 2000
9:00 a.m. - 5:30 p.m.

LOCATION: U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852
Room T-10A1

PURPOSE: The NRC staff will discuss plans for and exchange views on proposed final changes to 10 CFR 50.73 and associated guidance for nuclear power reactors. The focus of discussions will be the provisions of the proposed rule (64 FR 36291, 7/6/99) relating to reporting of degraded or nonconforming components and how the staff proposes to modify those provisions in response to the public comments received on the proposed rule. (See attached agenda)

PARTICIPANTS: NRC: Cynthia Carpenter, Dennis Allison, Melinda Malloy, et. al.
PUBLIC: Any interested member of the public¹

Attachment: Proposed Agenda

cc w/att: See next page

¹ This meeting is open to participation by all interested members of the public. To ensure adequate meeting accommodations, members of the public who wish to attend should contact Dennis Allison at (301) 415-1178 or dpa@nrc.gov no later than February 24, 2000.

cc: Mr. Ralph Beedle
Senior Vice President
and Chief Nuclear Officer
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

Mr. R. John Gianfrancesco, Jr.
Manager
Florida Power & Light Company
P.O. Box 14000
Juno Beach, FL 33408-0420

Mr. Otto L. Maynard, President
and Chief Executive Officer
Wolf Creek Nuclear Operating Corp.
P.O. Box 411
Burlington, KS 66839

Mr. James W. Davis, Director
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

Mr. John H. Mueller
Senior Vice President
and Chief Nuclear Officer
Niagara Mohawk
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, New York 13093-0063

S. K. Gambhir, Division Manager
Omaha Public Power District
444 South 16th Street Mall
P.O. Box 128
Omaha, Nebraska 68102-2247

Mr. Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer
North Atlantic Energy Service Corporation
P.O. Box 300
Seabrook, NH 03874

Ms. Sherry L. Bernhoff, Director
Florida Power Corporation
Crystal River Energy Complex
157670 W. Power Line Street
Crystal River, Florida 34428-6708

J. F. Alexander, Director
Entergy Nuclear Generation Co.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

H. L. Sumner, Vice President
Southern Nuclear Operating Company, Inc.
40 Inverness Parkway
P.O. Box 1295
Birmingham, Alabama 35201

Mr. Steven A. Toelle, Nuclear Regulatory
Assurance and Policy Manager
USEC
6903 Rockledge Drive
Bethesda, MD 20817

A. Edward Scherer, Manager
for Nuclear Regulatory Affairs
Southern California EDISON
San Clemente, CA 92674-0128

cc: (Continued)

Mr. Mark Burzynski, Manager
Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402-2801

Mr. Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer
North Atlantic Energy Service Corporation
P.O. Box 300
Seabrook, NH 03874

Mr. John R. Caves
Carolina Power & Light Company
P.O. Box 1551
411 Fayetteville Street Mall
Raleigh, NC 27602

Ms. Sherry L. Bernhoft, Director
Florida Power Corporation
Crystal River Energy Complex
157670 W. Power Line Street
Crystal River, Florida 34428-6708

Mr. Larry Newman, Acting Manager
Nebraska Public Power District
P.O. Box 98
Brownville, NE 68321

J. F. Alexander, Director
Entergy Nuclear Generation Company
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

Mr. Jim Knubel, Senior Vice President
and Chief Nuclear Officer
New York Power Authority
123 Main Street
White Plains, New York 10601

H. L. Sumner, Vice President
Southern Nuclear Operating Company, Inc.
40 Inverness Parkway
P.O. Box 1295
Birmingham, Alabama 35201

Mr. James H. McCarthy, Manager
Virginia Power
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060

Mr. Steven A. Toelle, Nuclear Regulatory
Assurance and Policy Manager
USEC
6903 Rockledge Drive
Bethesda, MD 20817

Mr. Nathan L. Haskell, Director
Consumers Energy
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

A. Edward Scherer, Manager
for Nuclear Regulatory Affairs
Southern California EDISON
P.O. Box 128
San Clemente, CA 92674-0128

Mr. Warren A. Witt
Assistant Plant Manager
Ameren Union Electric
P.O. Box 620
Fulton, MO 65251

cc: (Continued)

Lawrence F. Womack, Vice President
Nuclear Technical Services
Diablo Canyon Power Plant
PO Box 56
Avila Beach, California 93424

C. Lance Terry
Sr. Vice President and
Principal Nuclear Officer
Comanche Peak Steam Electric Station
PO Box 1002
Glen Rose, Texas 76043

Kenneth E. Peveler, Manager
Regulatory Performance
Alliant Energy
IES Utilities Inc.
Duane Arnold Energy Center
3277 DAEC Rd
Palo, IA 52324-9785

Charles H. Cruse
Vice President - Nuclear Energy
BGE
Calvert Cliffs Nuclear Power Plant
160 Calvert Cliffs Parkway
Lusby, Maryland 20657

Richard M. Fry, CHP
North Carolina Department of
Environment and Natural Resources
Division of Radiation Protection
3825 Barrett Dr.
Raleigh, NC 27609-7221

Dale Shipley, Deputy Director
Ohio Emergency Management
2855 West Dublin-Granville Rd
Columbus, Ohio 43235-2206

David L. Lochbaum
Nuclear Safety Engineer
Union of Concerned Scientists
1616 P Street, NW
Ste 310
Washington, DC 20026-1495

Thomas W. Ortziger, Director
States of Illinois
Department of Nuclear Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Northeast Utilities Service Company
ATTN: R.P. Necci, Vice President
Nuclear Oversight and Regulatory Affairs
P.O. Box 270
Hartford, Connecticut 06141-0270

February 11, 2000

MEMORANDUM TO: Cynthia A. Carpenter, Chief
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

FROM: Dennis P. Allison, Senior Reactor Systems Engineer/RA/
Generic Issues, Environmental, Financial
and Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: NOTICE OF PUBLIC MEETING ON PROPOSED CHANGES TO EVENT
REPORTING REQUIREMENTS IN 10 CFR 50.73 AND ASSOCIATED
GUIDANCE IN NUREG-1022

DATE AND TIME: February 25, 2000
9:00 a.m. - 5:30 p.m.

LOCATION: U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, Maryland 20852
Room T-10A1

PURPOSE: The NRC staff will discuss plans for and exchange views on proposed
final changes to 10 CFR 50.73 and the guidance in NUREG-1022 for
nuclear power reactors. The focus of discussions will be the provisions of
the proposed rule (64 FR 36291, 7/6/99) relating to reporting of degraded
or nonconforming components and how the staff proposes to modify
those provisions in response to the public comments received on the
proposed rule. (See attached agenda)

PARTICIPANTS: NRC PUBLIC¹
C. Carpenter Any interested member of the public
D. Allison
M. Malloy, et. al

Attachment: Proposed Agenda

cc w/att: See next page

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adequate meeting accommodations, members of the public who wish to attend should contact
Dennis Allison at (301) 415-1178 or dpa@nrc.gov no later than February 24, 2000.

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Working group (via e-mail)

PUBLIC MEETING ON EVENT REPORTING REQUIREMENTS

February 25, 2000

Proposed Agenda

1. Opening Remarks (NRC) & Introductions (All)
2. Summary of:
 - (a) the language of proposed rule (64 FR 36291, 7/6/99) and associated guidance relating to the deletion of the requirement to report conditions outside the design basis of the plant and the proposed requirement relating to reporting degraded or nonconforming components (as discussed during ACRS meeting on February 3, 2000),
 - (b) questions posed in the proposed rule on these changes, and
 - (c) summary of public comments received on these changes.
3. Review and explanation of draft final rule language and guidance points and implementation examples. (See attached pages.)
4. Questions and open discussion
5. Closing Remarks (NRC, All)

Attached pages:
Excerpts for Discussion

Excerpts for Discussion

Criterion:

Any event or condition that ... Required corrective action for a single cause or condition in order to ensure the ability of more than one train or channel to perform its specified safety function.

Guidelines:

This criterion requires reporting of an event or condition that required corrective action for a single cause or condition in order to ensure the ability of more than one train or channel to perform its specified safety function. It pertains only to written LERs. Telephone notifications are not required under this criterion.

For events of this type, the "reporting clock" does not start until it is determined that the event or condition requires corrective action for a single cause or condition in order to ensure the ability of more than one train or channel to perform its specified safety function. It is not possible to know whether an event is reportable under this criterion until that point is reached. Once the determination is made, a written LER is required within 60 days.

This criterion involves corrective actions taken for significant conditions adverse to quality, as required by 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action." However, it does not include those cases which only involve the checking of multiple trains or channels to determine whether there is a need for action. For example, if one train of a system fails as a result of a sticky solenoid operated valve, it is prudent to check other trains to see if there is a common problem. After checking, if no further action is required to ensure the ability of multiple trains to perform their safety functions, the event is not reportable under paragraph (a)(2)(ii)(C).

This criterion applies to common cause problems that span more than a single train or channel. It may apply to two trains or channels in one system, or it may apply to one train or channel in one system and another train or channel in another system. This is true regardless of whether or not the trains or channels have the same safety function and/or the trains or channels are assumed to be independent in the plant's safety analyses. For example, if it is necessary to correct a single cause or condition to ensure the ability of Train A of the an auxiliary feedwater system and Train A of a high pressure safety injection system to perform their safety functions, paragraph (a)(2)(ii)(C) applies. This is the case even though the two trains have different safety functions and may not be assumed to be independent in the plant's safety analysis.

Examples:

- (1) A motor operated valve in one train of the RHR/LPCI system was found with a crack 75 percent through the stem. The root cause was environmentally assisted stress corrosion cracking. This resulted from installation of an inadequate stem material, in both trains, as part of a plant modification package, about 14 years earlier. Pending replacement with better material, the valve stems in both trains were replaced with new stems. (Although the new stems were of the same material, they provided for

considerable time before failure could be expected.) The event would be captured by this criterion because replacement of the valve stems in both RHR trains was necessary to ensure their ability to perform their specified safety functions.

- (2) It was determined that a number of liquid-filled and isolated containment penetration lines were not adequately designed to accommodate the internal pressure buildup that could occur because of thermal expansion caused by heatup after a design basis accident. This internal pressure buildup could threaten the structural integrity of the penetrations under accident conditions. Several different corrective actions were taken, depending on the specific configurations of the penetrations. For example, for a number of penetrations, relief valves were installed. Some penetration lines were drained and procedures were instituted to ensure they would remain drained. In some lines, inboard containment isolation valves were opened to provide a pressure relief path (after meeting appropriate restrictions such as locking the outboard containment isolation valve closed). The event is reportable under §50.73(a)(2)(ii)(C) because corrective action was necessary for a single cause or condition to ensure the ability of multiple penetrations to perform their specified safety functions.
- (3) Switchyard voltage was observed to decrease below the minimum operability limit established in station procedures for both sources of offsite power. The cause was large amounts of power being transported across the grid concurrent with near peak loads. Reanalysis was performed and restrictions were placed on electrical lineups in order to support operability of the offsite power sources. The event is reportable under §50.73(a)(2)(ii)(C) because corrective action was necessary for a single cause or condition to ensure the ability of multiple offsite power sources to perform their specified safety functions.
- (4) One of three component cooling water pumps tripped due to a ground fault on the power cable leading to the pump. The likely cause was determined to be moisture permeation into the cable insulation over time, a mechanism that was not expected to occur for this type of insulation. The event would be reportable under §50.73(a)(2)(ii)(C) if it is determined that corrective action is necessary for a single cause or condition to ensure the ability of multiple pumps to perform their specified safety functions.
- (5) It was determined that numerous valves experienced over thrusting that exceeded design basis stress levels. The cause was lack of knowledge that resulted in inadequate design engineering at the time the designs were performed. Two kinds of corrective action resulted from reanalysis:
 - (i) Some valves were over stressed enough to require replacement to ensure they could perform their specified safety functions.
 - (ii) Other valves were being over stressed enough during routine operations that, although they were currently capable of performing their specified safety functions, the over stressing would, with the passage of time, render them incapable of performing those functions. These valves required modification of their control circuitry to limit stress during routine operation in order to preserve their ability to perform their specified safety functions.

The event would be reportable under §50.73(a)(2)(ii)(C) because corrective action was necessary for a single cause or condition to ensure the ability of multiple trains to perform their specified safety functions.