

November 18, 2011

MEMORANDUM TO: Rani L. Franovich, Chief
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Jocelyn Lian, Reactor Operations Engineer **/RA/**
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING
GROUP PUBLIC MEETING HELD ON OCTOBER 26, 2011

On October 26, 2011, the U.S. Nuclear Regulatory Commission (NRC) staff hosted the Reactor Oversight Process (ROP) Working Group public meeting with the Nuclear Energy Institute (NEI) ROP Task Force and other industry representatives. Enclosure 1 contains the meeting attendance list, and Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) contains the industry handouts, and Enclosure 3 (Accession No. ML11305A099) and 3 (ADAMS Accession No. ML11305A105) contains the NRC handouts. Meeting attendees discussed topics related to inspection, operating experience, assessment, and performance indicators (PIs).

The Reactor Inspection Branch staff offered the industry the opportunity for additional comments on proposed Temporary Instruction (TI) on 10 CFR 50.54(hh)(1), "Inspection of Procedures and Processes for Responding to Potential Aircraft Threats," and the industry had no further comments. Both the staff and industry preferred the table top exercise for this TI. The industry also had no additional comments on the NRC guidance for inspectors in the control room while performing Inspection Procedure (IP) 71153, "Followup of Events and Notices of Enforcement Discretion," and TI 2515-182, "Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping and Tanks."

The Performance Assessment Branch (IPAB) staff informed the industry that the Staff Requirement Memoranda (SRM) had not been issued for SECY-11-0076, "Improving the Public Radiation Safety Cornerstone of the Reactor Oversight Process." The staff informed

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meeting participants that the Office of Management and Budget clearance for the 2011 ROP external survey had not been obtained. The staff will announce via a *Federal Register* Notice, NRC Press Release, the ROP public Webpage, and email notification to NEI when the survey becomes available. The staff encouraged the public to review past survey questions and start formulating written comments. The staff informed the industry that the ROP tabletop exercise for new reactors meeting was conducted on 10/5/11, and another meeting was scheduled for 10/26/11 to further discuss and summarize the preliminary observations and key points from the exercises. The staff then informed the industry that the staff is working with internal stakeholders to develop a timeline for reintegrating the Security Cornerstone into the ROP Assessment Program, and will update the industry during the next ROP monthly meeting.

The Operating Experience Branch staff informed the industry that two OpE smart samples are being developed. One smart sample involves severe weather, and the other one involves non-conservative interpretations of technical specifications. All approved smart samples are documented in ADAMS and posted on the public Webpage. In addition, the staff will notify the industry in the ROP public meetings when a new smart sample is issued. The staff also informed the industry that two Information Notices will be issued. One involves ineffective use of vendor technical recommendations; the other involves (1) operation of non-seismic, non-safety, fuel pool purification systems interfacing with the refueling water storage tanks at pressurized water reactors, and (2) seismic concerns with tanks containing fluid associated with the standby liquid control system.

IPAB staff informed the industry that it implemented industry's suggestion to establish automatic email notifications of approved frequently asked questions (FAQs) when they are posted on the NRC's public Webpage. Stakeholders can receive these email notifications by completing the instructions at the following Web site: <https://public.govdelivery.com/accounts/USNRC/subscriber/new>. The staff provided proposed changes to NEI 99-02 to clarify guidance for including licensee event report (LER) numbers in the Safety System Functional Failure (SSFF) PI data submittal comments, reporting total reactor coolant system leakage PI data, including the overall Mitigating System Performance Index (MSPI) value in the data elements, and specifying the effective date for FAQs. The staff also stated that it was pursuing changes to the NRC's PI Web sites to display licensee comments from prior reporting periods. The industry indicated that it would pursue clarifying its PI collection and reporting software and/or procedures so that the LER numbers are reported with the SSFF PI data submittals. The industry also stated that it would propose alternative wording for the effective date guidance in NEI 99-02. IPAB staff also informed industry that it received a feedback form from an NRC inspector requesting clarification to the SSFF PI reporting date and may propose clarifying guidance for NEI 99-02 at a subsequent ROP Working Group meeting.

IPAB staff provided a supplement to the NRC's white paper on PI validity during extended showdowns and start-ups that summarized various options for how to treat MSPI during these conditions. The staff and industry discussed the various options and agreed that INPO would also need to be involved in these discussions because of the impacts of new guidance on PI collection and reporting software. The staff stated it would provide a more detailed written description of the options in a subsequent meeting. The industry provided some initial comments on the staff's draft white paper on PI validity. The industry expressed a preference that the Unplanned Scrams per 7,000 Critical Hours PI be considered valid after four quarters (instead of 2400 hours) after start-up. The staff expressed its desire to respond to multiple

scrams within four (or fewer) quarters because they may be caused by or involve potential licensee performance issues. The staff agreed to examine prior examples of how this PI was considered during start-up conditions or entry into the ROP. The staff and industry agreed to begin discussing the white paper in more detail at the next ROP monthly meeting.

The staff informed the industry that it is updating IP 71151, "Performance Indicator Verification," with a goal of having the IP issued by January 1, 2012. The staff informed the industry that it is also updating IP 71150, "Discrepant or Unreported Performance Indicator Data;" however, this IP will be issued after IP 71151.

The staff and industry then discussed FAQs. The status of FAQs is summarized below, and the FAQs are contained in Enclosure 2.

- FAQ 10-06: This FAQ resolution was approved as final. The staff will provide its final written approval of the FAQ resolution to the industry. The FAQ will be effective beginning with 2nd quarter 2012 data submitted in July 2012.
- FAQ 11-08: The staff provided its final written approval of the FAQ resolution to the industry (Enclosure 3).
- FAQ 11-09: This site-specific FAQ is withdrawn. The staff provided a response to the FAQ explaining why the FAQ is withdrawn. In addition, the staff had previously provided a proposed white paper on PI validity during extended shutdown to address this issue generically.
- FAQ 11-10: This FAQ was discussed in a closed meeting because of plant-specific security-related information. This FAQ is still being discussed, and any potential improvements to the generic guidance in NEI 99-02 for the security PI can be discussed in the ROP working group public meeting forum.
- FAQ 11-12: This site-specific FAQ for the James A. FitzPatrick Nuclear Power Plant was introduced. The FAQ involves the Unplanned Power Changes per 7,000 Critical Hours PI. The staff requested the licensee's applicable operating experience documentation, corrective action program documents, procedures, and work planning documents for review. The industry agreed to provide necessary information to aid staff's review. The staff will review the FAQ and provide comments at the next ROP working group public meeting.

R. Franovich

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The next ROP working group public meeting will be held on December 1, 2011.

Enclosures:

1. Attendance List – October 26, 2011
2. Meeting Agenda and Handouts
3. Meeting Agenda and Handouts by NRC

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1. Attendance List – October 26, 2011
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3. Meeting Agenda and Handouts by NRC

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ADAMS Accession Number: ML11304A260 Package:ML11305A107 * concurred by email

OFFICE	NRR/DIRS	BC:NRR/DIRS/IRIB	BC:NRR/DIRS/IOEB	BC:NRR/DIRS/IPAB
NAME	JLian	TKobetz*	JThorp	RFranovich
DATE	11/4/2011	10/27/2011	11/3/2011	11/ 18/2011

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST**

October 26, 2011

Roy Linthicum	Exelon
Bryon Ford	Entergy
Robin Ritzman	First Energy
Jim Peschel	NextEra Energy
Dave VanDerKamp	NPPD
Ken Heffner	Progress Energy
Rani Franovich	NRC
Jocelyn Lian	NRC
Audrey Klett	NRC
Kevin Roche	NRC
Michael Balazik	NRC
Bruce Mrowca	ISL
Duane Kawitz	STARS
Tim Kobetz	NRC
Carlos Sisco	Winston & Strawn
Ned Tyler	Constellation
Greg Sesson	PSEG Nuclear
Ronald Frahm	NRC
Lenny Sueper	Xcel Energy
Ron Gaston	Exelon
Chris Earls	NEI
Larry Parker	STARS Reg Affairs
Tony Zimmerman	Progress Energy
John Thompson	NRC
Erick Sweat	SNC
Dave Midlik	SNC
Jim Slider	NEI
Brian Yip	NRC
Ed Knutson	NRC
Joe Pechacek	Entergy
Gene Dorman	Entergy