

September 26, 2012

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

FROM: Ronald K. Frahm, Jr., **/RA/**
Senior Reactor Operations Engineer
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 AUGUST 29, 2012

On August 29, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff hosted the Reactor Oversight Process (ROP) Working Group (WG) public meeting with the Nuclear Energy Institute (NEI) ROP Task Force and other industry representatives. Enclosure 1 contains the meeting attendance list; Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12249A164) contains an industry handout entitled "Draft Whitepaper on probabilistic risk assessment (PRA) Technical Adequacy for Mitigating System Performance Index (MSPI);" and Enclosure 3 (ADAMS Accession No.: ML12249A168) contains the Frequently Asked Question (FAQ) Log and the four FAQs discussed during the meeting. Meeting attendees discussed topics related to PRA operational support, operating experience (OpE), inspection, assessment, and performance indicators (PIs).

Ho K. Nieh, Director, Office of Nuclear Regulator Regulation (NRR), Division of Inspection and Regional Support, opened the meeting by providing his perspectives on the importance of effective stakeholder interactions and continued improvements to the ROP.

The PRA Operational Support Branch (APOB) staff provided a status update on the development of the NUREG on common cause failures (CCF) by the Office of Nuclear Regulatory Research (RES). The RES staff is currently resolving public comments on the draft NUREG, some of which will be addressed via future research. The staff noted that an internal workshop between RES and NRR staff would be held in late September/October 2012 and will be followed by a public workshop in October/November 2012. APOB staff noted that the draft comment responses will be made available to the public before the workshop. APOB staff also provided a status of planned updates to the Risk Assessment Standardization Project guidance.

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The draft Revision 2 is undergoing internal stakeholder review and includes changes or additions to address CCF modeling, initiating event analysis, support system initiating events, loss of offsite power initiating events, and human reliability analysis. The staff is planning a public meeting to discuss the draft revision in the December 2012/January 2013 timeframe.

The Operating Experience Branch (IOEB) staff discussed the OpE Smart Sample (OpESS) program and encouraged the industry to identify potential future OpESS topics for staff consideration and to provide feedback on existing OpESSs. IOEB representatives noted that they are reviewing several potential topics and will inform industry when a suitable topic has been selected.

The Reactor Inspection Branch (IRIB) staff discussed Temporary Instruction (TI) 2515/187, "Inspection of Near-Term Task Force Recommendation 2.3 Flooding Walkdowns," and TI 2515/188, "Inspection of Near-Term Task Force Recommendation 2.3 Seismic Walkdowns," and noted that the independent NRC walkdowns should be completed by June 2013. NRC staff and industry both acknowledged that the coordination on the walkdowns to date seems to be effective. The IRIB staff also introduced Stephen J. Campbell as the lead for inspection activities related to lessons learned from Fukushima, provided updates on various TIs, and indicated that the NRC Website will be used to post TI status for Fukushima-related inspections. The IRIB staff discussed TI 2515/186, "Inspection of Procedures and Processes for Responding to Potential Aircraft Threats," and indicated that the TI should be issued shortly with a completion date of June 2014.

The IRIB staff indicated that the flowchart from Appendix B to Inspection Manual Chapter (IMC) 0612, "Power Reactor Inspection Reports," is being clarified to promote consistent implementation. The staff noted that a public meeting was conducted in June 2012 to discuss the draft inspection procedure (IP) for 50.69 inspections. This draft IP is being revised to incorporate feedback and comments and should be issued by the end of 2012.

The IRIB staff noted that Revision 3 to NUREG-1022, "Event Reporting Guidelines 10 CFR 50.72 and 50.73," has been routed for concurrence and should be issued in November 2012. The latest revision incorporates feedback from the public meeting on May 24, 2012, and a draft copy is publicly available (ADAMS Accession No.: ML12216A125). Currently, the staff anticipates an implementation date of February 4, 2013, but the industry asked the staff to consider an implementation date of April 1, 2012, to align with the PI data collection and reporting cycle. Staff noted that a Regulatory Issue Summary may be issued on this subject and informed meeting participants of its intent to conduct a workshop in early November in the Washington, DC, area and consider additional workshops near the NRC regional offices.

The Performance Assessment Branch (IPAB) staff informed the industry that Luis A. Cruz and other NRC staff will be joining IPAB in the coming months and will be involved in future ROP monthly meetings. Rani Franovich expressed her appreciation for allowing NRC staff to participate in MSPI training sponsored by the NEI. Ms. Franovich noted her intent to have the regional Senior Reactor Analysts utilize some of the training materials to train NRC inspectors.

The IPAB staff noted that the security cornerstone was reintegrated into the ROP assessment program on July 1, 2012. Licensees impacted by security reintegration received letters from the NRC informing them of the appearance of change in the ROP Action Matrix, and the NRC issued a press release to explain the newly displayed information in the ROP Action Matrix for the security cornerstone. The letters and press release were issued before the ROP public Website was updated on August 6, 2012, consistent with the NRC's change management plan. The staff indicated that integrated mid-cycle assessment letters would be issued and posted to the Website by September 6, 2012. NRC staff and industry both noted that the security reintegration was successfully implemented without any notable issues or concerns.

The IPAB staff also provided an update on the potential enhancements to the public radiation safety cornerstone of the ROP. The staff noted that internal and external stakeholders agreed that the existing PI program and Significant Determination Process were appropriately focused on public dose, and no additional changes were recommended at this time to either of these program areas. However, stakeholders noted that inspection program guidance could be augmented to direct inspectors to document "observations" of non-conformances with the Groundwater Protection Initiative (and the Underground Piping and Tanks Integrity Initiative) in NRC inspection reports. The staff noted its plans to revise the applicable inspection procedure(s) and inform the Commission of these minor program enhancements in a Commissioner Assistant note as opposed to a formal Commission paper. The staff further noted its plans to describe these minor program enhancements in its annual ROP self-assessment paper.

The staff also discussed recent revisions to IMC 0305, "Operating Reactor Assessment Program." The primary changes were to reintegrate security and to increase flexibility for conducting annual public assessment meetings. The staff plans to gauge the effectiveness of these changes based on feedback from internal and external stakeholders in future ROP surveys.

In the area of the PI program, staff and industry discussed the following items:

- (1) The IPAB staff informed industry that the most recent quarterly PI data were posted on the public Website on August 6, 2012. There was one late PI submittal by a licensee, but it did not delay posting of the PIs. Staff noted that the late submittal was from a licensee that had also submitted data late the previous quarter, but these particular instances appear to be isolated and resolved.
- (2) The IPAB staff noted that draft changes to IMC 0608, "Performance Indicator Program," were in concurrence and should be issued in the coming weeks.
- (3) The IPAB staff reiterated concerns related to timeliness of FAQ submittals, and NEI indicated it will provide a white paper on this topic during the next ROP WG public meeting.
- (4) The industry discussed the results of its MSPI sensitivity studies as they relate to defining timeframes for determining the validity of calculations during extended shutdown and start up conditions. Industry representatives stated that the test case and simulation results were inconsistent and provided no statistically valid or reliable conclusions; they further suggested that validity could best be determined on a case-by-case basis to preclude false positives and false negatives. Alternatively, an expert panel could agree upon a generic and appropriate timeframe that may not be technically justified.

- (5) The industry presented a draft white paper on PRA technical adequacy for MSPI (see Enclosure 2), noting that the paper was in the early stages of development and was still under industry review. The staff plans to review the draft white paper and present industry with its comments in an upcoming ROP WG public meeting. The staff did share some initial concerns based on a cursory review. Staff and industry discussed the following PI FAQs (see Enclosure 3):
- FAQ 12-01: This FAQ was withdrawn. Industry and NRC agreed on the wording in the NRC response section and decided to move forward with the public posting of this withdrawn FAQ.
 - FAQ 12-02: This FAQ was discussed and approved as final. The NRC reviewed and accepted the industry's updated wording.
 - FAQ 12-03: This FAQ was discussed and approved as final. The NRC provided industry with a written response describing its decision to count the scram with no exemption. Industry indicated that NEI would notify the staff in the next few days if the licensee were to decide to appeal the FAQ resolution.
 - FAQ 12-04: This FAQ was introduced. Industry presented the FAQ and the staff shared some preliminary perspectives. Staff and industry agreed to hold a separate public meeting to discuss the details of the FAQ and the staff's position on its resolution. The status of this FAQ will be discussed during future ROP WG meetings.

Participants agreed that an ROP WG public meeting would not be necessary in September 2012. The next ROP WG public meeting will be planned for October 17, 2012.

Enclosures:

1. Attendance List – August 29, 2012
2. Draft Whitepaper on PRA Technical Adequacy for MSPI
3. Reactor Oversight Process Task Force FAQ Log

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DATE	09/5/2012	09/5/2012	09/5/2012	09/26 /2012

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
August 29, 2012**

Ronald Frahm	NRC
Michael Balazik	NRC
Rani Franovich	NRC
Ho Nieh	NRC
Tim Kobetz	NRC
Sunil Weerakkody	NRC
John Thompson	NRC
Eric Thomas	NRC
Sunil Weerakkody	NRC
Aron Lewin	NRC
Steve Campbell	NRC
Roger Pedersen	NRC
Steve Garry *	NRC
Marty Phalen *	NRC
Kevin Roche	NRC
Luis Cruz *	NRC
F. Paul Peduzzi	NRC
Brian Yip	NRC
Bruce Mrowca	ISL
Jim Slider	NEI
Chris Earls	NEI
Ellen Anderson	NEI
Ken Heffner	Progress Energy
Tony Zimmerman	Progress Energy
Roy Linthicum	Exelon
Ron Gaston	Exelon
Robin Ritzman	FENOC
Cindy Williams	FENOC
Sarah Chisolm	Duke
Gerald Loignon	SCANA
Steve Catron	NextEra/FPL
Jana Bergman	Scientech
Carlos Sisco *	Winston & Strawn
Larry Parker	STARS
Gary Miller	Dominion
Larry Naron	Constellation
Leonard Sueper	Xcel Nuclear
Mark Reidmeyer	Certrec
Geoff Cook	TVA
David VanDerKamp	NPPD
Stan Baker *	Perry NPP
Dick Ferrell *	Perry NPP
Robert Coad *	Perry NPP
Lloyd Zerr *	Perry NPP
John Pelcic *	Perry NPP

* participated via teleconference