

November 16, 2001

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

FROM: Leonard N. Olshan, Project Manager, Section 1 /RA/
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER 4, 2001, MEETING WITH ELECTRIC
POWER RESEARCH INSTITUTE TO DISCUSS RISK-INFORMED
ACTIVITIES

On October 4, 2001, the NRC staff met with members of the Electric Power Research Institute (EPRI) staff and its contractors to discuss the extension of the EPRI risk-informed inservice inspection (RI-ISI) methodology to break exclusion region (BER) piping. A list of those attending the meeting is provided as Attachment 1. The handouts provided by EPRI are available under ADAMS Accession Number ML012820071.

The NRC approved the EPRI RI-ISI methodology for generic application to ISI of piping in 1999. EPRI submitted a report on February 28, 2001, that provides the details of the extension of the EPRI RI-ISI methodology to these applications. The purpose of the meeting was to follow-up on the August 2000 and April 2001 meetings with the NRC staff, continue the industry dialogue for ongoing risk and performance based applications, discuss the status of RI-ISI applications and discuss the schedule of forthcoming activities.

The staff and EPRI discussed the following issues during the meeting:

1. The NRC staff agreed to the following schedule for the review and approval of the EPRI report on the application of RI-ISI methodology to BER piping:

NRC staff to issue request for additional information (RAI)	October 31, 2001
EPRI to provide responses to staff RAI	December 31, 2001
NRC staff to issue safety evaluation	March 31, 2002

The staff further stated that this schedule may be impacted if ACRS review is needed and that the staff would contact the ACRS to determine if a presentation to the ACRS is required.

2. The staff stated that the EPRI extension of RI-ISI methodology for BER piping does not provide adequate guidance on the indirect consequence evaluation for these piping segments, and that it may not be consistent with the guidance provided in Section 3.6.2 of the Standard Review Plan related to the criteria for evaluating dynamic effects associated with the postulated rupture of piping.

3. The staff would like to see a complete and comprehensive industry-wide list of history of observed degradation mechanisms, pipe leaks, and pipe breaks of welds in the break exclusion zone.
4. EPRI suggested that changes proposed in the subject EPRI report for ISI of BER piping be implemented via 10 CFR 50.59 evaluations since these requirements are typically defined in the Updated Final Safety Analysis Report . The staff will consult the Office of General Council to determine the feasibility of this approach. The staff will also ask EPRI to provide detailed justification, along with an example 10 CFR 50.59 package, for making this change through the 10 CFR 50.59 process.
5. The staff noted that the two Appendices, provided as example applications, depart from the Addendum methodology in some areas. The staff will provide some examples in its RAI.
6. The staff and EPRI discussed whether the application of RI-ISI process to BER piping will be independent of its application to balance of plant piping. The Addendum states that whenever a BER program is changed, the change in risk associated with the program change alone will be developed and maintained as part of the on-site documentation. If a RI-ISI relief request has been developed, the cumulative RI-ISI results including changes in the BER program will also be developed and maintained as part of the on-site documentation. The ability to change the BER program without implementing a RI-ISI program was discussed. The staff believes that it would be prudent for the industry to develop a uniform position on this subject.

The staff will consider these topics and positions as it reviews the Addendum.

Project No. 669

cc: See next page

cc:

Mr. James Lang

Director

EPRI

1300 W.T. Harris Boulevard

Charlotte, NC 28262

Dr. Theodore U. Marston

Vice President and Chief Nuclear Officer

EPRI

3412 Hillsview Avenue

Palo Alto, CA 94304

Mr. Gary Vine

Sr. Washington Representative

EPRI

2000 L St. NW, Suite 805

Washington, DC 20036

3. The staff would like to see a complete and comprehensive industry-wide list of history of observed degradation mechanisms, pipe leaks, and pipe breaks of welds in the break exclusion zone.
4. EPRI suggested that changes proposed in the subject EPRI report for ISI of BER piping be implemented via 10 CFR 50.59 evaluations since these requirements are typically defined in the Updated Final Safety Analysis Report . The staff will consult the Office of General Council to determine the feasibility of this approach. The staff will also ask EPRI to provide detailed justification, along with an example 10 CFR 50.59 package, for making this change through the 10 CFR 50.59 process.
5. The staff noted that the two Appendices, provided as example applications, depart from the Addendum methodology in some areas. The staff will provide some examples in its RAI.
6. The staff and EPRI discussed whether the application of RI-ISI process to BER piping will be independent of its application to balance of plant piping. The Addendum states that whenever a BER program is changed, the change in risk associated with the program change alone will be developed and maintained as part of the on-site documentation. If a RI-ISI relief request has been developed, the cumulative RI-ISI results including changes in the BER program will also be developed and maintained as part of the on-site documentation. The ability to change the BER program without implementing a RI-ISI program was discussed. The staff believes that it would be prudent for the industry to develop a uniform position on this subject.

The staff will consider these topics and positions as it reviews the Addendum.

Project No. 669

cc: See next page

DISTRIBUTION:

PUBLIC	DTerao
PDIV-2 R/F	RidsNrrDlpmLpdiv (SRichards)
RidsOgcMailCenter	RidsNrrDlpm (JZwolinski/TMarsh)
RidsAcrsAcnwMailCenter	DMcCain
RidsNrrPMLOlshan	
RidsNrrLAEPeyton	
SAlI	
TChan	
Sdinsmore	Meeting Notice: ML012640205
Yli	Package: ML013110573
MMarkley	

ADAMS ACCESSION NUMBER: **ML013110561** *See previous concurrence

OFFICE	PDII-1/PM	PDIV-2/LA	PDIV-2/SC
NAME	LOlshan:as	EPeyton*	JHickman for SDembek
DATE	11/16/2001	11/14/2001	11/16/2001

OFFICIAL RECORD COPY

LIST OF ATTENDEES
ELECTRIC POWER RESEARCH INSTITUTE
MEETING TO DISCUSS RISK-INFORMED ACTIVITIES
OCTOBER 4, 2001

NRC

S. Ali
T. Chan
S. Dinsmore
Y. Li
M. Markley
L. Olshan
D. Terao

EPRI

P. O'Regan

OTHER

C. Boggess, Westinghouse Owners Group
R. Greybeal, Proto-Power Corp.
E. McClain, Nine Mile Point
B. Montgomery, Ameren UE, Callaway Plant
J. Moody, J.H. Moody Consulting