

August 6, 2007

MEMORANDUM TO: Mark Rubin, Chief  
Probabilistic Risk Assessment Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulations

FROM: Stephen Dinsmore, Senior Reliability and Risk Engineer /RA/  
Probabilistic Risk Assessment Licensing Branch  
Division of Risk Assessment  
Office of Nuclear Reactor Regulations

SUBJECT: SUMMARY OF THE JULY 18, 2007, CATEGORY 2 PUBLIC MEETING  
WITH THE NUCLEAR ENERGY INSTITUTE (NEI) TO DISCUSS USE  
OF ASME ADDENDA B (2005) TO STANDARD RA-S-2002 TO  
SUPPORT DEVELOPMENT OF RISK-INFORMED, IN-SERVICE  
INSPECTION PROGRAMS.

On July 18, 2007, a Category 2 public meeting was held between the U. S. Nuclear Regulatory Commission (NRC) staff and industry representatives at the Nuclear Energy Institute headquarters. A list of attendees is enclosed. The purpose of this meeting was for the industry representatives to present its proposal for satisfying the PRA quality guidelines for risk-informed inservice inspection (RI-ISI) programs developed using ASME Code Case N-716 "Alternative Piping Classification and Examination Requirements, Section XI Division 1." Code Case N-716 has not been endorsed for use by the NRC but has been used in two pilot application under review by the NRC staff.

The two approved RI-ISI methodologies (ML013470102 and ML012630349) require an RI-ISI specific probabilistic analysis which is used to develop the proposed programs. Code case N-716 would, instead, rely on generic information from previously developed RI-ISI programs, supplement by a focused, plant specific analysis. Industry has proposed that a satisfactory focused, plant specific analysis could be performed according to the flooding analyses identified in ASME RA-Sb-2005, "Standard for Probabilistic Risk Assessment for Nuclear Power Plant Applications," Addendum B to ASME RA-S-2002, ASME.

The industry opened the meeting by providing a draft report (Enclosure 2) that includes a table with all the flooding elements from the ASME standard and the capability category descriptions for each element. Each element in the table also includes industry's proposed assessment of which capability category would satisfy the quality requirements for a flooding analysis in support of a RI-ISI program developed according to code case N-716. Each flooding element and industry's proposed assessment of the acceptable capability category was discussed during the meeting.

The NRC staff indicated that the industry proposed approach appears to be reasonable based on the major improvements in the flooding analysis elements in Addendum B to the ASME standard. The staff indicated that it would determine acceptable capability categories based, at a minimum, on consistency with the analyses found acceptable in the two endorsed RI-ISI methodologies and with RG 1.178, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: For Inservice Inspection of Piping" (ML032510128). Comparing the industry's proposed acceptable capability categories with the analysis required by the endorsed documents, the staff did not agree that the proposed capability categories for some elements were sufficient (i.e., the staff recommended that a higher capability category should be required). Industry proposed to evaluate the staff comments and develop a final white paper with its proposals. Industry will submit this white paper to the NRC when it is complete.

No members of the public were in attendance. No public meeting feedback forms were received.

Enclosures:

1. List of Attendees
2. Industry Handout

cc w/encl: See next page

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NAME	SDinsmore
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<b>List of Attendees for July 18, 2007</b>	
<b>Name</b>	<b>Organization</b>
Biff Bradley	NEI
Stephen Dinsmore	NRC
Steven Dolly	Inside NRC/Platts
Andrea Keim	NRC
Patrick O'Regan	EPRI
James Pak	Dominion
Deepak Rao	Entergy
Paul Stevenson	Westinghouse

ENCLOSURE 1

cc:

Mr. Anthony Pietrangelo, Vice President  
Regulatory Affairs  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708  
[arp@nei.org](mailto:arp@nei.org)

Mr. H. A. Sepp, Manager  
Regulatory and Licensing Engineering  
Westinghouse Electric Company  
P. O. Box 355  
Pittsburgh, PA 15230-0355

Mr. Jack Roe  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708  
[jwr@nei.org](mailto:jwr@nei.org)

Mr. Charles B. Brinkman  
Washington Operations  
ABB-Combustion Engineering, Inc.  
12300 Twinbrook Parkway, Suite 330  
Rockville, MD 20852

Mr. Gary L. Vine, Executive Director  
Federal and Industry Activities, Nuclear  
Sector  
EPRI  
2000 L Street, NW, Suite 805  
Washington, DC 20036  
[gvine@epri.com](mailto:gvine@epri.com)

Mr. Pedro Salas  
Regulatory Assurance Manager - Dresden  
Exelon Generation Company, LLC  
6500 N. Dresden Road  
Morris, IL 60450-9765

Ms. Barbara Lewis  
Assistant Editor  
Platts, Principal Editorial Office  
1200 G St., N.W., Suite 1100  
Washington, DC 20005  
[Barbara\\_lewis@platts.com](mailto:Barbara_lewis@platts.com)

Mr. Gary Welsh  
Institute of  
Nuclear Power Operations  
Suite 100  
700 Galleria Parkway, SE  
Atlanta, GA 30339-5957

Alexander Marion, Executive Director  
Nuclear Operations & Engineering  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708  
[am@nei.org](mailto:am@nei.org)

Mr. James H. Riley, Director  
Engineering  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708  
[jhr@nei.org](mailto:jhr@nei.org)