

April 21, 2014

MEMORANDUM TO: Dan Merzke, Acting Chief
Performance Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Andrew Waugh, 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 APRIL 2, 2014

On April 2, 2014, 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. ML14106A571) contains the white papers and handouts discussed during the meeting; Enclosure 3 (ADAMS Accession No. ML14107A056) contains the Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting; and Enclosure 4 (ADAMS Accession No. ML14107A064) contains an ROP WG action items log. Meeting attendees discussed topics related to probabilistic risk assessment (PRA), assessment, and performance indicators (PIs).

The PRA Operations and Human Factors Branch staff discussed the NRC's plan to hold a public meeting with the Pressurized Water Reactor Owners Group (PWROG) to discuss Risk Assessment of Operational Events handbook revisions on the use of (1) Conditional Core Damage Probability (CCDP) vs. Change in Core Damage Frequency and (2) minimum joint human error probabilities in Significant Determination Process (SDP) assessments. This meeting will be scheduled after the PWROG submits a white paper, on alternative approaches to the use of CCDP metrics for SDP analyses, to the NRC for review.

The Reactor Inspection Branch (IRIB) discussed the issuance of the revised Licensee Event Report (LER) form (NRC Form 366). The staff indicated that the Office of Management and Budget (OMB) has recently approved continued use of the LER form. The revised LER form went into effect in January 2014, and includes changes to font formatting as well as an editorial change in Block 12, "Licensee Contact for this LER." No other major changes were made.

IRIB staff also discussed event reporting of momentary secondary containment inoperability. The NRC acknowledged stakeholder concerns regarding clarifications made in NUREG-1022, Revision 3 "Event Reporting Guidelines: 10 CFR 50.72 and 50.73," that impacted event reporting of inoperable secondary containments. In response to these concerns, the NRC is

working with stakeholders to evaluate potential revisions to the Technical Specifications that would take into account secondary containment momentary conditions (such as loss of vacuum or doors open for routine passage). The NRC is also considering enforcement discretion for near term relief such that inoperability of secondary containment would not need to be declared for certain conditions. The NRC indicated that no revision to NUREG-1022, Revision 3 is planned at this time.

The Performance Assessment Branch (IPAB) staff noted that the annual ROP self-assessment Commission paper is in the concurrence process. This year's paper includes a discussion of the Commission directed independent review of the ROP, and staff's actions and/or plans to address the recommendations and suggestions from the independent review. The SECY should be issued in mid-April, and will be discussed at the Agency Action Review Meeting (AARM) and Commission meeting on the results of the AARM.

IPAB staff also noted that NUREG-2165, "Safety Culture Common Language," was issued in March 2014. The NUREG formalizes the safety culture common language, as agreed upon by NRC staff and industry, for use in NRC programs. The language is consistent with that published in INPO 12-012, "Traits of a Healthy Nuclear Safety Culture," and will be implemented for ROP applications in accordance with IMC 0310, "Aspects Within Cross-Cutting Areas."

IPAB staff provided an update on the status of progress for the ROP Enhancement Project. A new working group was established to evaluate the industry proposal for replacing the substantive cross-cutting issue (SCCI) process. The staff intends to hold a public meeting around the middle of May to discuss the proposal. The staff indicated that it started evaluating the Action Matrix criteria, and this issue will be worked in parallel with the SCCI process. The staff mentioned that it has incorporated the recommendations for the ROP Independent Assessment report into the scope of the ROP Enhancement Project. Staff also summarized progress in developing the recommendations from the baseline inspection program portion of the Enhancement Project.

To correct information that was disseminated at the 2014 Regulatory Information Conference, IPAB staff stated that the NRC is no longer pursuing a mobile friendly application for the ROP.

The NRC introduced a white paper titled "Modeling the Safety Significance of Findings that are the Proximate Cause of an Initiating Event Occurrence and a Framework for Defining the Threshold for Causality to Support the Significance Determination Process (SDP)" (ADAMS Accession No. ML14080A051). The industry is responding with their own white paper, which they are currently reviewing internally, but they believe that both white papers are mostly aligned.

The industry presented a white paper titled "Exclusion of Low Risk Trains/ Segments from Unavailability Monitoring" (Enclosure 2) for the staff to consider, and discussions on this white paper are planned to take place during the next ROP WG public meeting.

The industry presented a white paper "Proposal for use of Licensee PRA Models in the Significance Determination Process" (Enclosure 2) to the NRC staff. The staff reminded the meeting attendees that NEI presented a similar letter on this subject (M. Fertel, dated 2007),

and the NRC EDO (L. Reyes, August 2007) responded to the letter. The NRC staff will review this paper internally and provide any further comments during the next ROP WG public meeting.

The Office of Nuclear Security and Incident Response (NSIR) discussed staff's current efforts to develop additional Security PIs that will better represent licensee performance in areas relating to licensee's physical protection programs. NSIR staff has begun coordination with NEI to begin PI development. PI development is projected to go through calendar year 2015; test and evaluation of PIs will be in 2015 and 2016, with potential implementation in 2017.

The NSIR Cyber Security Directorate (CSD) staff discussed the NRC's continued efforts on cyber security oversight development. The CSD is currently developing inspection criteria and is looking at gathering more data about the inspection process by conducting another inspection process pilot.

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

- (1) The staff provided comments on the white paper industry introduced during the January ROP WG public meeting (Enclosure 2) to define initial transient within the Scrams with Complications PI, specifically for Boiling Water Reactors.
- (2) The staff conveyed that Hatch's Alert and Notification System (ANS) sirens are considered operational as of April 1, 2014. Hatch will be reporting the initial data for the ANS Reliability PI in July 2014. The staff asked industry about the Consolidated Data Entry program readiness to accept this PI data starting on July 2014. The staff recommended to industry that Hatch submit an FAQ on their plan to report the ANS PI data.

Staff and industry discussed the following PI FAQs (see Enclosure 3):

- FAQ 13-04: This FAQ is final. This is a site-specific FAQ for Point Beach, Units 1 and 2. This FAQ indicates that Point Beach will not be reporting PI data for the eight sirens that overlap with Kewaunee's emergency planning zone, as they are still the responsibility of Kewaunee. As a tracking measure Point Beach will document and report siren performance for these eight sirens in the comments section of the Point Beach Unit 1 and Unit 2 ANS Reliability performance indicator. Once Kewaunee is no longer responsible for the eight sirens that overlap the Emergency Planning Zones, Point Beach will assume responsibility and will report the PI data.
- FAQ 13-05: This FAQ is final. This is a generic FAQ submitted by Oyster Creek. This FAQ addresses a power reduction that occurred prior to a planned power reduction activity. The staff determined that this event counts as an unplanned down power since the down power was initiated less than 72 hours following the discovery of an off-normal condition and prior to the planned power reduction activity.

The meeting members noted that the Advisory Committee on Reactor Safeguards conference room where the meeting was held better accommodated the WG because of the larger size of the room, the superior audio-visual capabilities, and the increased phone quality for the bridge line participants.

The next ROP WG public meeting is scheduled to be held on May 14, 2014.

Enclosures:

1. Attendance List – April 2, 2014
2. White Papers Discussed in the
April 2, 2014, ROP WG Public Meeting
3. Reactor Oversight Process Task
Force FAQ Log – April 2, 2014
4. ROP Working Group Action Items
Tracking Log – April 2, 2014

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2. White Papers Discussed in the April 2, 2014, ROP WG Public Meeting
3. Reactor Oversight Process Task Force FAQ Log – April 2, 2014
4. ROP Working Group Action Items Tracking Log – April 2, 2014

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| NAME | AWaugh | SWong for SWeerakkody | CRegan | DMerzke |
| DATE | 4/11/14 | 4/21/14 | 4/15/14 | 4/21/14 |

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
April 2, 2014**

| | |
|--------------------|-----------------|
| Andrew Waugh | NRC |
| Luis Cruz | NRC |
| Ronald Frahm | NRC |
| Rani Franovich | NRC |
| Mike Balazik | NRC |
| Stephen Vaughn | NRC |
| Daniel Merzke | NRC |
| Eric Powell | NRC |
| Molly Keefe | NRC |
| Allen Howe | NRC |
| Aron Lewin | NRC |
| See-Meng Wong | NRC |
| Ralph Costello | NRC |
| Frederick Sullivan | NRC |
| Eric Schrader | NRC |
| Todd Smith | NRC |
| Chris Regan | NRC |
| Carl Grigsby | NRC |
| Julio Lara* | NRC |
| Jim Slider | NEI |
| AJ Clore | NEI |
| Roy Linthicum | PWROG/Exelon |
| Larry Parker | STARS Alliance |
| Lenny Sueper | Xcel Energy |
| Tony Zimmerman | Duke Energy |
| Deann Raleigh | Sciencetech |
| Robin Ritzman | FENOC |
| Cindy Williams | FENOC |
| Adrienne Driver | Duke Energy |
| Camille Zozula | Westinghouse |
| Jerod Hanson | NEI |
| Bruce Mrowca | ISC |
| Elijah DeVaughn | SNC |
| Ron Gaston | Exelon |
| Duane Filchner | PPL Susquehanna |
| Ken Heffner | Certrec |
| Sarah Zafar | ERIN |
| Suzanne Leblang | Entergy |
| Tracy Honeycutt* | SNC |
| Peter Wilson* | TVA |
| Gary Miller* | Dominion |
| Dave Mannai* | Entergy |
| Steve Catron* | NextEra Energy |
| Marvin Lewis* | |

*participated via teleconference and/or online meeting