

U.S. Nuclear Regulatory Commission Public Meeting Summary

April 23, 2015

Title: The Performance-Based Emergency Core Cooling Systems Cladding Acceptance Criteria (Title 10 of The Code of Federal Regulations (10 CFR) Section 50.46c) Proposed Rule

Meeting Identifier:

Date of Meeting: April 23, 2015

Location: Teleconference and Webinar only

Type of Meeting: Category 3

Purpose of the Meeting(s): The purpose of the meeting was to discuss implementation comments received related to the 10 CFR 50.46c proposed rule (Agencywide Documents Access and Management System (ADAMS) Accession No. ML12283A174.) The U.S. Nuclear Regulatory Commission (NRC) did not accept formal written comments during the meeting. This was the first in a series of 3 public teleconferences/webinars on implementation of the 50.46c proposed rule.

General Details: The meeting was attended by 38 individuals including industry representatives, members of the public, and NRC staff, all of whom participated through audio teleconferencing and webinar.

Summary of Presentations: The meeting slides and handouts are available in ADAMS under Accession Nos. ML15112A154 and ML15112A137. In addition to the material presented in the slides, the major areas of discussion are summarized below.

Public Participation Themes:

Introductory Remarks

The meeting started with welcome, introductions, and meeting ground rules. NRC staff made a brief presentation; these slides are in ADAMS at ML15112A154. The staff noted that this meeting was follow up to a category 3 public meeting the NRC held on March 17-18, 2015, on implementation of the 50.46c proposed rule. During that meeting, stakeholders suggested a series of public teleconferences to discuss details of an alternative implementation plan for NRC consideration. This meeting was the first of those follow-on teleconferences. Information from the March 2015 meeting can be found in ADAMS at ML15071A272.

Industry Presentation

A representative from the Tennessee Valley Authority (TVA), Thomas Eichenberg, provided a presentation on the industry's suggested implementation plan for the 50.46c proposed rule. This presentation is in ADAMS at ML15112A137. Key points of discussion include the following:

- The industry discussed that they had taken the initiative to poll licensees regarding the level of effort needed and scheduling input for the 50.46c proposed rule. Ninety-nine percent of the industry voluntarily provided this information to NEI, and this information was used to formulate the overall implementation schedule provided in the presentation slides. Subsequent to the meeting, NEI provided the documents that they had distributed to the industry. These documents are in ADAMS at ML15113A709 and ML15113A754. Additional details/caveats provided include the following:
 - 4 to 5 plants are planning to move to new cladding material
 - 10 to 12 plants will need fuel changes during the implementation period
 - A couple steam generator replacements are expected – impact?
 - Mixed cores have not been discussed nor approach to evaluation
- Vendors have not decided whether to submit compliance demonstration to approved methods as standalone or supplements to existing documentation.
- Industry noted the milestone of providing the analysis methods to the NRC in one working year.
- Industry noted the following License Amendment Requests (LARs) by bin:
 - 31 Level 1, 9 month level of effort assumption
 - 5 Level 2, 15 month level of effort assumption
 - 33 Level 3, 24 month level of effort assumption
- The Gantt chart identified 17 vendor topical report submissions and 68 LARs.
- Industry questioned whether they should put Vogtle and Summer in the integrated plan. NRC responded that an alternative integrated schedule could be used to replace Table 1 in the proposed rule, and Vogtle and Summer were not included in Table 1. Industry noted that Watts Bar 2 had its own distinct LAR.
- A member of the industry proposed replacing “must comply” in the regulation with definition of what compliance means. A member of the NRC general counsel noted that the NRC is considering this comment and is discussing it internally. The NRC will work to provide more information on this at the next public webinar/teleconference on May 7.
- A member of the industry questioned whether cumulative effects of regulation (CER), particularly as referenced in SECY-15-0050, is being considered as a part of this proposed rule. A member of the NRC general counsel noted that such discussions on implementation are consistent with the intent of CER principles.

Action Items/Next Steps:

- Prepare for May 7, 2015 public webinar; the second in the series of public teleconferences/webinars on implementation of the proposed rule.
 - NRC noted the following actions for themselves:
 - Prepare to discuss definition of compliance date(s) at next webinar/teleconference
 - Begin internal conversation on resource loading
 - Industry voluntarily noted the following action items for themselves:
 - Expand on vendor methodology section
 - Expand on mechanical design, to the extent possible
 - Keep AP1000 in Gantt chart
 - Better identify those particular LARs with multiple methods

Attachments:

- Meeting agenda – ML14190A002
- ADAMS accession number to NRC staff presentation – ML15112A154
- ADAMS accession number to industry presentation – ML15112A137

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**Accession Nos.: Pkg: ML15138A411; Notice ML15056A293; Summary ML15138A434, NRC Presentations
 ML15112A154; Industry Presentations: ML15112A137 NRC-001**

OFFICE	DPR/PRMB/PM	DPR/PRMB/RS	DPR/PRMB/BC	DPR/PRMB/PM
NAME	ABone	GLappert	TInverso	ABone
DATE	5/19/2015	5/20/215	5/21/2015	5/21/2015

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**List of 50.46c Public Meeting Attendees
April 23, 2015**

Name		Organization
Tara	Inverso	NRC
Paul	Clifford	NRC
Geary	Mizuno	NRC
Ashley	Guzzetta	NRC
Gordon	Cleffton	NEI
Tom	Eichenberg	TVA
Alysia	Bone	NRC
Ralph	Landry	NRC
Steve	Smith	NRC
Glenna	Lappert	NRC
Charles	Albury	South Texas
John	Alvis	Anatech
Victor	Cusumano	NRC
David	Fink	Westinghouse Electric Company
Kurt	Flaig	Dominion
Robert	Florian	Southern Nuclear
Kenneth	Frederick	First Energy
Brice	Gasser	DTE Energy
Mark	Handrick	Duke Energy
Gregory	Hill	American Electric Power
Jerald	Holm	Areva
Korey	Hosack	Westinghouse Electric Company
Steven	Laur	NRC
Marvin	Lewis	Independent
Roy	Linthicum	Exelon
Shanlai	Lu	NRC
David	Medek	AZ Public Service
Alan	Meginnis	Areva
Thomas	Remick	AZ Public Service
Tim	Sande	Intercon
Michael	Shockling	Westinghouse Electric Company
James	Smith	Westinghouse Electric Company
Alfred	Strasser	Aquarius Services
Gregg	Swindlehurst	GS Nuclear Consulting
Robert	Theuret	Westinghouse Electric Company
Tom	Tramm	Certrec
Jennifer	Whitman	NRC
Ken	Yueh	Electric Power Research Institute