

May 31, 2016

MEMORANDUM TO: Nathan Sanfilippo, Chief  
Performance Assessment Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Andrew Patz, 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 MAY 18, 2016

On May 18, 2016, 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. Meeting attendees discussed various topics including a Problem Identification and Resolution (PI&R), ROP for new reactor designs, and the Significance Determination Process (SDP).

Enclosure 1 contains the meeting attendance list.

Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16152A568) contains the handouts discussed during the meeting.

#### Branch Updates

The Probabilistic Risk Assessment (PRA) Operations and Human Factors Branch (APHB) staff informed the ROP WG attendees on the status of the development of an enhanced Inspection Manual Chapter (IMC) 0609 Appendix M, "Significance Determination Process Using Deterministic Criteria." This update is targeted to implement an Integrated Risk-Informed Decision Making (IRIDM) framework. Since the use of IMC 0609 Appendix M has drawn significant interest from both internal and external stakeholders, NRC staff has developed a draft project plan that seeks active participation of industry and other public stakeholders to deliver an enhanced guidance document for SDP decision making when quantitative SDP tools are not available or have limitations. This draft project plan includes workshops and public meetings to engage external stakeholders for comment and feedback. NRC staff will provide this draft project plan to stakeholders as soon as available to help coordinate the participation of interested industry stakeholders in the upcoming public meetings and workshops planned through Calendar Year (CY) 2016.

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The Security Training and Support Branch (STSB) staff from the Office of Nuclear Security and Incident Response had no updates for May.

The Reactor Inspection Branch (IRIB) staff had no updates for May.

The Performance Assessment Branch (IPAB) staff updated meeting participants on recent issued documents:

- The ROP self-assessment paper for CY2015 was issued to the Commission (ADAMS Accession No. ML16053A326).
- The Fiscal Year 2015 industry trends results were issued to the Commission (ADAMS Accession No. ML16054A693). This will be the final industry trends report as this program was retired as part of the Project Aim rebaselining initiative.
- Mid-cycle assessments will be conducted in August 2016, but will be eliminated starting in 2017 as part of the Project Aim rebaselining initiative.
- The respective IMCs for the Project Aim changes will be updated in late 2016.

#### Frequently Asked Questions

No FAQs are open at this time. Industry noted that a white paper will be submitted to the NRC regarding the update to the baseline availability of plant components from the 2002-2004 reference sample.

#### PI&R WG Public Workshop

The NRC briefed the public on the NRC's PI&R enhancement initiative (see Enclosure 2). The principle messages communicated included:

- (1) The NRC's PI&R Enhancement Initiative *is not* the result of a single substantive problem; rather the cumulative response to several ongoing ROP assessment processes as outlined in the PI&R Working Group Charter (see ADAMS Accession No. ML15290A004).
- (2) The PI&R Working Group intends to continue to (a) pursue the charter's three principle recommended enhancements and eight tasks, (b) keep all stakeholders informed of proposed changes, and (c) welcome comments and insights.
- (3) No final decisions have been made and no draft procedure changes have been circulated.
- (4) Consistent with internal inspection procedure (IP) and IMC revision processes, there are no specific plans to publically circulate drafts prior to management approval.
- (5) A 12-week extension to charter milestones was granted on April 29<sup>th</sup> with the exception of the effective date for revised IPs and IMCs which moved from July 1, 2016, to January 1, 2017. As shown on the timeline (see slides in Enclosure 2), this should provide ample opportunity for all stakeholders to become familiar with any changes approved prior to implementation.

NEI and the NRC staff discussed industry questions. The items below were discussed. There is interest in improving tools for PI&R inspection, assessment, and application to improve effectiveness, objectivity, and transparency, to assure licensee PI&R programs and processes continue to perform adequately and continue to provide appropriate assurance of public safety and security. Areas of potential PI&R enhancement currently under consideration and discussion include:

- a) Enhanced transparency, predictability, tracking, and follow-up inspection of licensee planned corrective actions to prevent recurrence (PCAPRs) of significant conditions that

were not fully implemented and satisfactorily inspected prior to closure of an associated finding and/or supplemental inspection. This action is not envisioned as an acceptable substitute for holding a finding or supplemental inspection open until a corrective action plan is inspected and determined to be credible and acceptable but would augment the acceptance of any incomplete or incompletely-inspected corrective action plan. This enhancement leverages existing processes as recommended by industry; and

- b) Leveraging PI&R cross-cutting aspect codes P1 through P6 (from IMC 0310, "Nuclear Material Safety and Safeguards Inspection Reports) in association with the currently-budgeted 10-15% of routine PI&R baseline inspection effort to identify and communicate more timely and effective PI&R insights associated with documented findings. These concise coded insights might be better-integrated into the biennial inspection processes for IP 71152, "Problem Identification and Resolution" in order to enhance its efficiency, effectiveness, objectivity, transparency, and reliability. This enhancement leverages existing processes as recommended by industry.

#### ROP for New Reactors

The staff distributed and discussed the initial project plan for developing the ROP for New Reactors (ADAMS Accession No. ML16145A086). The plan includes key milestones and deliverables necessary for monitoring progress of the project, ultimately resulting in a Commission paper describing the revised program and subsequent changes to program documents. The staff summarized the draft AP1000 performance verification matrix (ADAMS Accession No. ML16076A212) which had been previously discussed and distributed during the March 2016 ROP WG meeting (ADAMS Accession No. ML16035A170). Industry provided and the ROP WG discussed comments on the matrix (see Enclosure 2). The staff noted its intent to revise the matrix based on these comments, and to start populating the matrix to annotate how each of the key Structures, Systems, and Components (SSCs) would be monitored and assessed, through performance indicators submitted by industry and/or through inspection and significance determination by the NRC. Industry noted its intent to potentially share the latest AP1000 PRAs with the staff, or a summary of the changes and differences since the Design Certification Document submittal. This information will improve the relative importance entries in the performance verification matrix. Ultimately, the AP1000 performance verification matrix will be used as a basis to create an AP1000 risk information matrix (RIM), which in turn will be used as a basis for determining the frequency and the number of samples that will be conducted for the most risk significant SSCs during the ROP baseline inspection program.

Both NRC staff and industry noted their intent to finish developing and then discuss their respective white papers with proposals for performance indicators for new reactors. The discussion will take place during a future teleconference public meeting in June if feasible, or during the July 2016 ROP WG meeting. The staff also reiterated its intent to finish developing the draft AP1000 transition implementation plan and to share and discuss the draft plan at a future ROP WG meeting.

#### IMC 0609, Appendix O

The NRC staff discussed the draft of IMC 0609, Appendix O, "Post-Fukushima Mitigating Strategies Significance Determination Process (Orders EA-12-049 and EA-12-051)" with industry representatives. The presentation slides are included in Enclosure 2. The industry representatives provided a number of substantive comments that focused on the technical basis of the document. In general, the industry was supportive of the risk-informed screening

approach chosen by the staff versus a more deterministic approach used in other significance determination process documents such as IMC 0609, Appendix L, "B.5.b Significance Determination Process." The staff agreed to assess whether the technical basis document would be finalized in parallel with issuance of Appendix O. The staff will discuss further development of Appendix O and its technical basis at a future public meeting. Specific industry comments are provided in Enclosure 2.

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**ADAMS ACCESSION NO.: ML16152A556****ADAMS Package No.: ML16152A518****\*concurring via email**

<b>OFFICE</b>	NRR/DIRS/IPAB	BC:NRR/DIRS/IRIB	BC:NRR/DIRS/IPAB	NRR/DIRS/IPAB
<b>NAME</b>	APatz	DWillis	NSanfilippo	APatz
<b>DATE</b>	5/26/2016	5/27/2016	5/27/2016	5/27/2016

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
May 18, 2016**

Nathan Sanfilippo	NRC	Glen Masters	INPO
Dori Willis	NRC	Bruce Mrowca	ISL
Chris Miller	NRC	Steve Catron	NextEra
Shana Helton	NRC	Drew Hall	SCANA
Sunil Weerakkody	NRC	Alex Gilbreath	Southern
Andrew Patz	NRC	Howard Mahan	Southern
Andrew Waugh	NRC	Larry Parker	STARS
Russell Gibbs	NRC	Lenny Sueper	Xcel Energy
Ron Frahm	NRC	Beth Wetzel	TVA
Eliza Hilton	NRC	Carlos Cisco*	Winston
Andrea Johnson	NRC	Alexander Butcavage	
Ayo Ayegbusi	NRC	Stephen Nass	
David Stroup	NRC	Randy Ragland	
Carl Weber	NRC		
Dan Merzke	NRC		
Joanna Bridge	NRC		
Vicki Foster	NRC		
Ross Telson	NRC		
Harriet Karagiannis	NRC		
Lynn Mrowca	NRC		
See Meng Wong	NRC		
Scott Freeman	NRC		
Steve Campbell	NRC		
Anthony Masters*	NRC		
Rebecca Sigmon*	NRC		
Ryan Alexander*	NRC		
Jeff Mitman*	NRC		
Jamie Heisserer	NRC		
Marc Ferdas	NRC		
Ann Marie Stone	NRC		
Joylynn Quinones-Navarro	NRC		
James Slider	NEI		
Ken Heffner	Certrec		
Deann Raleigh	Curtiss Wright		
Diane Aitken	Dominion		
James Pak	Dominon		
Tony Zimmerman	Duke Energy		
Jeff Hardy	Entergy		
Ron Gaston	Exelon		
Stephanie Hanson	Exelon		
Jim Landale*	Exelon		
Roy Linthicum	Exelon		
Robin Ritzman	First Energy		
Nick Rochford*	First Energy		

\*participated via teleconference and/or  
online meeting