

November 14, 2016

MEMORANDUM TO: Kevin Hsueh, Chief  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

FROM: Brian Benney, Senior Project Manager /RA/  
Licensing Processes Branch  
Division of Policy and Rulemaking  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF JUNE 28, 2016, MEETING WITH THE NUCLEAR  
ENERGY INSTITUTE TO DISCUSS LOW RISK AND LOW SAFETY  
SIGNIFICANT COMPLIANCE ISSUES

On June 28, 2016, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of the Nuclear Energy Institute (NEI) at NRC Headquarters, Two White Flint North, 11601 Landsdown Street, North Bethesda, Maryland. The purpose of the meeting was to discuss improving the efficiency of handling low risk compliance issues. The meeting notice and agenda are available in the Agencywide Documents Access and Management System (ADAMS) under Package Accession No. ML16180A348.

The purpose of the meeting was for NEI to share its industry operability guidance initiative and give the NRC staff an update on the industry effort. Slides are available under ADAMS Accession No. ML16182A185.

The industry presentation highlighted that roughly 10 operability determinations are done per unit per day. The operability process is typically done after entering a technical specification action. Alarms or indicators can lead to entry into a limiting condition for operation (LCO). An operability determination is then performed. The industry's working group is intending to create three guidance documents: 1) an operability determination process document (including definitions); 2) a guidance document for resolution of degraded or non-conforming conditions; and 3) a frequently asked questions and operating experience document. The working group is providing separate guidance for resolving degraded and non-conforming conditions because the operability determination process is only for determining if a structure, system, or component (SSC) is operable. If the SSC in question is operable, then any additional degraded or non-conforming conditions should be handled outside the operability determination process. The NEI representatives requested to meet with the staff again in about three months, at which time, they hope to be able to provide substantially more detail on the guidance they are preparing.

CONTACT: Brian Benney, NRR/DPR  
(301) 415-2767

The NEI representatives made it clear in their presentation that NEI is focusing much of its attention on Chapters 6 and 15 of the Final Safety Analysis Report (FSAR) as forming the basis for defining the specified safety function of an SSC.

The NRC staff reminded the working group that the accident information in Chapters 6 and 15 in the FSAR do not represent all accidents, transients, and anticipated operational occurrences (AOOs) that a plant is required to be able to mitigate. The design-basis accident analyses in the FSAR are bounding analyses, and therefore, are expected to ensure the licensee has the capability to mitigate many other less severe accidents, transients, and AOOs.

It was agreed to hold another meeting/workshop.

Project No. 689

The NEI representatives made it clear in their presentation that NEI is focusing much of its attention on Chapters 6 and 15 of the Final Safety Analysis Report (FSAR) as forming the basis for defining the specified safety function of an SSC.

The NRC staff reminded the working group that the accident information in Chapters 6 and 15 in the FSAR do not represent all accidents, transients, and anticipated operational occurrences (AOOs) that a plant is required to be able to mitigate. The design-basis accident analyses in the FSAR are bounding analyses, and therefore, are expected to ensure the licensee has the capability to mitigate many other less severe accidents, transients, and AOOs.

It was agreed to hold another meeting/workshop.

Project No. 689

DISTRIBUTION:

PUBLIC	RidsNrrLADHarrison	RidsNrrOd	RidsOpaMail
RidsNrrDirs	RidsOgcMailCenter	RidsNrrDssStsb	KHsueh
RElliott	RidsACRS_MailCTR	PLPB R/F	BBenney

EXTERNAL DISTRIBUTION:

MONTGOMERY, Bruce [bsm@nei.org](mailto:bsm@nei.org)

**ADAMS Accession Nos.: Package (ML16180A348); Summary (ML16221A396); Notice (ML16089A359);**  
**\*concurrence via e-mail** **NRC-001**

OFFICE	DPR/PLPB/PM	DPR/PLPB/LA*	DSS/STSB/BC*	DPR/PLPB/BC	DPR/PLPB/PM
NAME	(JHolonich for) BBenney	DHarrison	RElliott	KHsueh	BBenney
DATE	09/2/2016	09/2/2016	11/3/2016	11/10/2016	11/14/2016

OFFICIAL RECORD COPY