

Enclosure 2

PRA Technical Adequacy Working Group
Improved Process for Closure
Of Industry Peer Review
Facts and Observations
Meeting Summary of the 11/29/2016
Meeting with
U.S. Nuclear Regulatory Commission
and
Nuclear Energy Institute
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PRA Technical Adequacy Working Group Improved Process for Closure of Industry Peer Review Facts and Observations

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F&O Closure Process History

- NRC agreed with and recommended further development of Industry “Hybrid Approach” in June 2015 White Paper.
- In January 2016 letter, NRC staff provided response to industry white paper stating attributes should be developed for specific types of F&Os to be closed out using the hybrid approach.
- NEI draft guidance, February 9, 2016 introduced an “Independent Assessment” approach.
- NEI letter dated Sept. 9, 2016 stated that the licensee close-out was renamed Independent-Assessment.
- Renaming licensee close-out to Independent Assessment does not address previous staff concerns related to licensee-closeout.

NRC Draft Staff Position, RG 1.200

Handout #1

F&O Pilot History

- 1st Pilot of Independent Assessment performed in July 2016. Two NRR staff members attended as observers.
- 2nd Pilot of Independent Assessment performed in November 2016. Two NRR staff members, one contractor attended as observers.

Pilot Independent Assessment Identified Strengths

- IA Team had direct access to model of record (MOR) and supporting documentation.
- IA Team had access to Peer Review Report(s) including text of the original F&O.
- Process appears suitable for closure of F&Os addressing:
 - Documentation issues
 - Individual modelling and method errors
 - Incorrect F&O's

Pilot Independent Assessment Identified Issues

- Identification and disposition of model upgrades
 - focused scope peer review per ASME Standard still needed
- Some F&Os difficult to interpret and closure may not result in meeting CCI w/o checking the SR.
- IA Process potentially prohibited finding and/or documenting new F&Os.
- Clarity is needed between IA Team's exit meeting and issuance of the final report (i.e., can additional F&Os be closed during this time, additional documentation and review of closure material?)

Cont'd Pilot Independent Assessment Identified Issues

- Guidance was added for the host utility and the IA team to identify any “upgrades” for focused scope review. Should be addressed in NEI 05-04 guidance...
- Guidance was added for the host utility for the capability category of the affected SRs by F&O closure be re-assessed. Should be addressed in NEI 05-04 guidance...
- Concept of “remote” review introduced and piloted
 - Limited interaction with on-site team. Recommended to be used only for small number of F&Os.
- No discussions about possible upgrades was observed, although some methods (e.g., breaker coordination) had been changed.

Cont'd Pilot Independent Assessment Identified Issues

- Limited re-assessment of SR text, particularly when there are multiple linked F&Os.
- Premature closure of F&Os based upon licensee's "promise" to fix documentation.

Pilot Independent Assessment Draft Results

Pilot #	Total F&Os	Resolved	Partially Resolved	Open
1	115	87	3	25
2	88	67	15	6

- Discrepancies between licensee closure versus closure review team demonstrates need for an independent closure process.

Path Forward

- Review both Pilot's F&O closure team final report .

Timeline

1. Incorporate lessons learned and update NRC staff position
2. Incorporate lessons learned in NEI 05-04, Appendix X
3. Observe a few additional IA pilots
 - Recommend different utility be used
4. Endorse a process for closure of F&Os after lessons learned and consensus position incorporated
 - Endorsement to ensure transparency of process