

Enclosure 4

Closure Process for Industry Peer Review
Facts and Observations
Meeting Summary of the 11/29/2016
Meeting with
U.S. Nuclear Regulatory Commission
and
Nuclear Energy Institute
DATED: January 19, 2017

Closure Process for Industry Peer Review

Facts and Observations

- Presenter: Adrienne Driver, Adrienne.Driver@nrc.gov
 - Office of Nuclear Reactor Regulation
 - November 30, 2016

Risk Informed Steering Committee

F&O Closure Process History

- **June 2015** – NEI submitted white paper to NRC
- **July-December 2015** – interaction among WGs
- **January 2016** – NRC response letter
- **February 2016** – NEI submitted draft guidance
- **April 2016** – NRC issued draft staff regulatory position
- **May 2016** – Public meeting to discuss staff position and NEI guidance
- **July 2016** – First industry pilot
- **September 9, 2016** -- NEI letter stated that the licensee close-out was renamed Independent-Assessment.
- **November 2016** – Second industry pilot
- **November 29, 2016** -- Public meeting with industry WG

November 29th Public Meeting

- **NRC Perspectives: RG 1.200 Draft Staff Position**
 - The process has been conceptual up until the staff received guidance in February 2016
 - Generic guidance provided is inadequate for staff endorsement
 - Generic guidance needs to address staff position
 - Additional pilot needed:
 - First two pilots based on host utility guidance, not on NEI generic guidance
 - Pilot with different utility to observe using updated generic guidance
 - Pilots will not have to submit the closed F&Os for future risk applications

Pilot Independent Assessment Observations

- Process appears suitable for closure of F&Os addressing:
 - Documentation issues
 - Individual modelling and method errors
 - Incorrect F&O's
- Insufficient guidance for identification and disposition of model upgrades
 - Focused scope peer review per ASME Standard may still be needed
 - **Path for Resolution:** Industry to incorporate into their guidance a requirement to review the licensee's determination of "upgrades"
- Independent Assessment (IA) process guidance prohibits finding and/or documenting new F&Os
 - **Path for Resolution:** Improve NEI guidance that new findings should not be ignored but documented in the report
- Documentation of the resolution
 - Findings are characterized as documentation, however SR write-up in Peer Review reports are unclear at times
 - F&O should not be closed with a suggestion stating documentation is incomplete
 - **Path for Resolution:** Generic guidance to address a new category, "partially resolved – documentation only." The F&O(s) should still be submitted to NRC for PRA applications

Milestone Schedule and Audits

- Clarity is needed between IA team's exit meeting and issuance of the final report
 - Certain additional F&Os are allowed to be closed during this time
 - Unclear which unresolved F&Os can be closed, and how the IA team assesses the resolution
- NRC staff to review closure review team final reports