

February 6, 2017

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

FROM: Ayesha Athar, Reactor Operations Engineer */RA/*  
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SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING  
GROUP PUBLIC MEETING HELD ON JANUARY 12, 2017

On January 12, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff hosted the Reactor Oversight Process (ROP) working group public meeting with the Nuclear Energy Institute (NEI) ROP Task Force and other industry representatives. Meeting attendees discussed various topics including revisions to the ROP baseline engineering inspection procedures, updates to NEI 99-02, "Regulatory Assessment Performance Indicator Guideline" (ML13261A116 ) and the ROP for new reactors.

Enclosure 1 contains the meeting attendance list.

Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17037D295) contains the presentations and handouts discussed during the meeting.

Enclosure 3 (ADAMS Accession No. ML17037D301) contains the Performance Indicator (PI) Frequently Asked Questions (FAQs) Log and the FAQs discussed during the meeting.

#### Branch Updates

The Reactor Inspection Branch (IRIB) staff informed the ROP Working Group attendees of their plan to select the next licensee's engineering programs to inspect sometime in mid-2017 timeframe as well as their plans to conduct a pilot inspection similar to the environmental qualification (EQ) inspection.

Additionally, NRC staff stated that the Agency is considering not performing the EQ inspection at last year's pilot plants for a second time during this inspection cycle and is also working with the industry to assess the crediting of a licensee's self-assessment in lieu of NRC inspection for selected EQ inspections during CY 2017 through 2020.

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NRC staff also discussed issuance of three engineering inspection procedures, IP 71111.21M (ML16238A320), Design Bases Assurance Inspection – Team; IP 71111.21N (ML16237A126), Design Bases Assurance Inspection – Program; and IP 71111.17T (ML16340A998), Evaluations of Changes, Tests and Experiments. These IPs were effective January 1, 2017, and the first EQ inspection is planned to be conducted at McGuire Nuclear Power Station starting in January 23rd. There was a request to make all of the EQ inspection dates available to the public and the NRC staff agreed to provide them in the minutes of this January ROP public meeting—see Enclosure 2. Also, NRC staff informed the industry of plans to use an internal panel for the review of each EQ inspection finding to ensure consistency between the regions on the greater-than-minor threshold.

Feedback received from the public included the desire for future meetings to discuss both the industry and NRC's efforts on performing a holistic review of engineering inspections to make them more efficient and effective. There were also questions on the timing of the NRC's internal inspection panel reviews and how many inspection resources might be required for future engineering program inspections.

#### Potentially Generic Inspection-Related Issues

NEI brought a concern to the staff's attention related to Significance Determination Process timeliness metrics and how new metrics may be influencing the way the staff interacts with licensees, including how inspection findings are dispositioned. The issue of generic concern was the unintended consequences of existing timeliness metrics. The staff discussed the concern with the industry and committed to monitor impacts that timeliness metrics have on Agency decision-making.

#### Industry Efforts

There were no issues to discuss at this meeting.

#### Severe Accident Management Guidelines ROP Implementation Plan Discussion

The staff stated that the ROP was recently updated to allow for oversight of a licensee's commitment to consider Severe Accident Management Guidelines (SAMGs) in the plant configuration management process. This was done via publication of Inspection Procedure (IP) 71111.18, "Plant Modifications," (ML16306A185). The staff also stated that the ROP would be again revised by the end of 2017 to allow for oversight of the site specific incorporation of any new Owner's Groups (OG) Severe Accident Guidance (SAG) revisions. This would allow for oversight associated with updating to PWROG SAG revision 0 and BWROG SAG revisions 3 and 4 (as well as future potential revisions). The staff indicated that a draft of the new inspection activity would be made publically available in the July 2017 timeframe.

#### Oversight of Technical Specification Risk Informed Completion Times Discussion

The staff made stakeholders aware of a recent NRC initiative to consider incorporation of Technical Specification (TS) Risk Informed Completion Times (RICT) into the ROP. Part of the consideration is to determine the level of effort or depth of oversight needed. Another consideration is having RICT oversight in place by the end of 2017. In order to support IP finalization by the end of 2017, a draft would likely need to be issued by the end of June 2017. Industry representatives indicated a desire to be kept informed of the effort, including the desire to have the draft IP be made publically available.

#### Frequently Asked Questions

In the area of the PI program, staff and industry discussed FAQ 16-04 and industry introduced FAQ 17-01:

- FAQ 16-04: This FAQ was proposed by Tennessee Valley Authority (TVA), concerning a reported Safety System Functional Failure (SSFF) at their Browns Ferry 2 unit during a planned maintenance outage for the High Pressure Safety Injection system where a breaker failed. The resident inspectors determined that this failure was not related to the maintenance activity and therefore was reportable as a SSFF. The licensee argued that since the failure occurred during a maintenance outage, it should not count towards the SSFF PI and is requesting that NEI 99-02, "Regulatory Assessment Performance Indicator Guidelines," be updated to include guidance that would allow licensees to not report SSFFs for the PI under these circumstances. The staff discussed this FAQ with industry and licensee representatives and committed to discuss internally the requirements of NUREG 1022, "Event Reporting Guidelines," vs. NEI 99-02 and whether new guidance would be required.
- FAQ 17-01: This FAQ was proposed by Entergy regarding an event that occurred in June 2016. During turbine stop valve testing, a solenoid valve failure led to multiple vessel level and reactor power oscillations over an extended period of time, followed by an automatic reactor scram. The NEI 99-02 guidance for the Unplanned Power Changes per 7000 hours PI does not account for an event such as this. The licensee is seeking clarity from the ROP Working Group on whether this event should count only as a reactor scram, or if it should count towards the Unplanned Power Change PI as well, and if so, how many times. The working group briefly discussed some of the interpretations and approaches that could be taken for this FAQ. The staff committed to discussing this internally to determine the best way to address the issue and will present their proposal to the working group at a later date.

An industry white paper regarding updating critical hours when updating baseline planned unavailability was discussed. Staff communicated concerns with oversimplified guidance that fails to take into account how a change to maintenance philosophy might affect critical hours and whether that should be taken into account when making updates. Industry was concerned with overcomplicated guidance. The working group agreed to proceed with an FAQ to update the guidance and would discuss the final wording at that time.

The staff also reintroduced the effort to update NEI PI guidance for plants in extended shutdowns or during initial startup. The staff committed to submitting a white paper with proposed guidance for incorporation into NEI 99-02. This guidance will clarify when to label PIs invalid and monitorable during and following extended shutdowns and during initial startup.

#### Draft Implementation Plan for AP1000 Transition from Construction to Operation

Office of New Reactors staff provided an update regarding the Draft Implementation Plan to Ensure NRC Staff Readiness for AP1000 Operations, Rev. 0 (ML15299A390). This document was recently made publicly available and copies were handed out at the meeting. NEI provided a few comments verbally during the meeting and also mentioned that more comments would be forwarded to the staff in writing by the end of January. Staff mentioned that there is a Category 3 public meeting scheduled for January 19, 2017, at Vogtle where this topic would be discussed, and provided copies of the meeting notice for those interested in participating. Staff suggested that, depending on the comments received by industry/public, NRC and industry should plan to discuss those comments at a future ROP public meeting. Staff plans to send a final version of the draft for Office Director and Regional Administrator approval in March 2017.

CAP-2 Initiative

NEI provided a briefing on the CAP-2 Initiative. CAP-2 is the name of NEI's document #16-07 describing the industry initiative to streamline the Corrective Action Program (CAP). First, some answers to previously asked questions were provided:

1. Q: Was CAP-2 modeled after Exelon's CAP?  
A: CAP-2 was not modeled after any specific licensee's CAP.
2. Q: Will CAP-2 impact industry standards such as NQA-1 (NQA-1 is the Nuclear Quality Assurance Standard, written by the American Society of Mechanical Engineers, and adopted by most nuclear facilities) or licensee Quality Assurance Topical Reports (the quality assurance basis documents that licensees submit to the NRC)?  
A: Some licensees may need to revise Quality Assurance Topical Reports to fully align with CAP-2.
3. Q: Will CAP-2 seek to define Condition Adverse to Quality (CAQ) and/or Significant Condition Adverse to Quality (SCAQ)?  
A: Yes – both. Will revise NQA-1 definition of SCAQ: "issues that have a serious impact on safety or operability."

NEI shared some additional highlights regarding the CAP-2 initiative. First, NEI indicated that CAP-2 is not about reducing the numbers of condition reports (CRs) written. Monitoring has shown that the number of CRs has not decreased. NEI also highlighted that CAP-2 focuses on fixing problems at the lowest level at the earliest time without unnecessary analysis/admin. Furthermore, NEI stated their position that CAP-2 will comply with all existing regulations. NEI plans to submit NEI-16-07 (CAP-2 Document) mid-February, and offer a presentation and opportunity for staff to ask questions at the March ROP Public Meeting. NEI also expressed a desire to engage with regional staff to answer questions and is looking for opportunities for an additional public question and answer session in June or July timeframe. NEI will request NRC endorsement by the third quarter of 2017. Finally, NEI informed staff that they are targeting industry implementation beginning January 2018.

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NAME	AAthar	CRegan	NSanfilippo	AAthar
DATE	2/6/2017	2/6/2017	2/6/2017	2/6/2017

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING  
ATTENDANCE LIST  
September 21, 2016**

Chase Franklin*	NRC	Peter Wilson	TVA
Chris Cahill*	NRC	Robin Ritzman	First Energy
AnnMarie Stone*	NRC	Chris Nolan	Duke
Benjamin Mabbott*	NRC	James Slider	NEI
Andrew Patz*	NRC	Jim Landale*	Exelon
Theresa Clark*	NRC	Carlos Cisco*	Winston
Jeremy Bowen*	NRC	Ken Heffner*	Certrec
Stephen Campbell*	NRC	Roy Linthicum	PWROG
Joel Wiebe*	NRC	Jeff Hardy	Entergy
Sunil Weerakkody*	NRC	Don Dube*	Jensen Hughes
Terrence Brimfield*	NRC	Martin Murphy	Xcel Energy
Elijah Dickson*	NRC	Greg Halnon	First Energy
Mark King*	NRC	Larry Parker	STARS Alliance
John Rutkowski*	NRC	Darani Reddick	Exelon
Daniel Sargis*	NRC	Diane Aitken	Dominion
Nathan Sanfilippo	NRC	Erin Anners	Southern
Ross Telson	NRC	Deann Raleigh	Curtiss Wright
Ayesha Athar	NRC	James Pak	Dominion
Daniel Merzke	NRC	Ron Gaston	Exelon
Robert Krsek	NRC	Tony Zimmerman	Duke Energy
Andrea Johnson	NRC	Bryan Ford	Entergy
Ron Frahm	NRC	Lenny Sueper	Xcel Energy
Mike King	NRC	Keith Jury	Exelon
Jim Isom	NRC	Chris Earls	NEI
Russell Gibbs	NRC	John Giddens	Southern
Chris Miller	NRC	Bruce Mrowca	ISL
Joanna Bridge	NRC	Nick Rochford*	
Brandon Hartle	NRC	Bob Meyer*	
Odunayo Ayegbusi	NRC	Marvin Lewis*	

\*participated via teleconference and/or  
online meeting