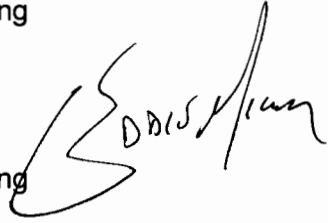




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 8, 2017

MEMORANDUM TO: Douglas A. Broaddus, Chief  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: G. Edward Miller, Project Manager  
Special Projects and Process Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation 

SUBJECT: SUMMARY OF OCTOBER 5, 2017, PUBLIC MEETING WITH  
NUCLEAR ENERGY INSTITUTE REGARDING PROBABILISTIC  
RISK ASSESSMENT CHANGE CONTROL PROCESS

On October 5, 2017, the U.S. Nuclear Regulatory Commission (NRC) staff held a public meeting<sup>1</sup> with staff from the Nuclear Energy Institute. The purpose of the meeting was to discuss the change control process of probabilistic risk assessments (PRAs) following approval of a license amendment request (LAR) to implement a risk-informed completion time program. Specifically, the meeting was to discuss when a change in PRA methodology would require a licensee to seek regulatory approval prior to implementation of the methodology.

During the meeting, the NRC staff presented slides that provided both a background of why a change control process was needed and the spectrum of options available to implement such a process.<sup>2</sup> The following points were noted during the meeting:

- The appropriate solution would likely need the following attributes:
  - Provide the NRC assurance that the PRA is adequate to support the intended application;
  - Provide clarity for implementation and inspection;
  - Preclude unneeded LARs; and
  - Have the proper format in the appropriate section of the Technical Specifications.
- NRC staff noted that clarity for implementation and inspection would include a clear method for an inspector to write a violation if the process was not followed properly.
- The definition of what constituted a "significant" change in PRA methods could require significant additional work.
- Implementation of the third option would potentially require significant inspection resources.

<sup>1</sup> The original meeting notice is available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML17271A059.

<sup>2</sup> The NRC slides are available under ADAMS Accession No. ML17282A029.

- Although previous examples indicated that the amendment process was the vehicle for a licensee to request approval, other methods may be appropriate too (e.g., letter approval).

No regulatory decisions were made and both the NRC staff and the Nuclear Energy Institute indicated that they would consider the items discussed in the meeting. It was agreed that another meeting was needed to continue discussion of this topic.

Following the discussion, an opportunity was afforded to any other participants who wished to ask questions or make comments. No questions or comments were received in the meeting.

Enclosure:  
List of Attendees

**ENCLOSURE  
LIST OF ATTENDEES**

**DATE: Oct 5, 2017**

## Public Meeting With NEI to Discuss PRA Change Control Process

[illegible]

10F2

# Sign In Sheet

DATE: Oct 5, 2017

Public Meeting With NEI to  
Discuss PRA Change Control  
Process

Name	Organization
Lay Robinson	NRC/NRR/DRA/APLA
Brian Mann	TSTF
Gene Kelly	EXELON
JEFF STONE	EXELON
GREG KUEBCK	NEI
Khad'jah West	NRR/DE/EICB
Harry Barrett	NRR/DRA/APLA
VIA PHONE	
CRAIG NIEROIE	DOMINION
ALLEN MOLDENHAUER	DOMINION
GLENN STEWART	EXELON
PHILLIP GRISSOM	SNC
CAMILLE ZOZULA	WESTINGHOUSE
PAMELA BURNS	SNC

2 of 2

SUBJECT: SUMMARY OF OCTOBER 5, 2017, PUBLIC MEETING WITH NUCLEAR  
ENERGY INSTITUTE REGARDING PROBABILISTIC RISK ASSESSMENT  
CHANGE CONTROL PROCESS DATED DECEMBER 8, 2017

**DISTRIBUTION:**

PUBLIC

RidsACRS\_MailCTR Resource

RidsNrrDorl Resource

RidsNrrDorlLspb Resource

RidsNrrDraApla Resource

RidsNrrDssStsb Resource

RidsNrrLAJBurkhardt Resource

RidsOpaMail Resource

**ADAMS Accession No.: ML17279A915****\*via e-mail**

OFFICE	NRR/DORL/LSPB/PM	NRR/DORL/LSPB/LAiT	NRR/DORL/LSPB/LA
NAME	GEMiller	IBetts	JBurkhardt
DATE	10/31/2017	10/24/2017	10/31/2017
OFFICE	NRR/DRA/APLA/BC	NRR/DORL/LSPB/BC	NRR/DORL/LSPB/PM
NAME	SRosenberg	DBroaddus	GEMiller
DATE	11/01/2017	12/08/2017	12/08/2017

**OFFICIAL RECORD COPY**