



UNITED STATES
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August 1, 2018

MEMORANDUM TO: Gregory T. Bowman, Chief
Reactor Oversight Process Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Joylynn Quinones-Navarro, Reactor Operations Engineer /RA/
Reactor Oversight Process Assessment Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS WORKING
GROUP PUBLIC MEETING HELD ON JULY 19, 2018

On July 19, 2018, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a Reactor Oversight Process (ROP) Working Group public meeting with the Nuclear Energy Institute's (NEI's) ROP Task Force and other industry representatives. A summary of the discussion topics is provided below.

Enclosures:

1. Attendance List
2. ROP Public Meeting Presentation
ROP IMC 0609 APP update
3. ANO FAQs

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Frequently Asked Questions (FAQs)

FAQ 18-02 requested to delay the effective date of the IE01 and IE03 performance indicators (PIs) for Watts Bar Unit 2 until the third quarter of CY 2018 “to allow sufficient data for an accurate assessment value.” A proposed NRC response to FAQ 18-02 was made publicly available on March 30, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18088A821). Following discussion at the April 5, 2018, ROP public meeting, the licensee submitted Revisions 1 and 2 of the FAQ (ADAMS Accession Nos. ML18136A858 and ML18136A865, respectively). An updated proposed NRC response was made publicly available on May 17, 2018 (ADAMS Accession No. ML18136A868). After some discussion at that meeting, the status of the updated FAQ response was changed to tentatively approved. During the July 19, 2018, ROP public meeting, the FAQ response status was changed to “Final Approved NRC Response” without making any changes to the previously-proposed answer on May 17, 2018.

Entergy submitted one new FAQ for NRC review. FAQ 18-04 requests a plant-specific exemption from the guidance related to the unplanned scram with complications PI for ANO-1 due to the unique circumstances which led to entry into the Overcooling EOP during a May 16, 2018, reactor scram. The NRC will review and comment on this FAQ during a separate public meeting phone call that will be scheduled for mid-August 2018.

NEI 99-02 White Papers

During the April 5, 2018, ROP public meeting (ADAMS Accession No. ML18109A397), NEI introduced three white papers associated with emergency preparedness PIs to the NRC for review. Subsequent to this meeting, on July 24, 2018, NEI indicated through an email (ADAMS Accession No. ML18207A686) that they are withdrawing two of the three white papers. As such, these white papers are no longer under NRC review.

Enhancing the ROP

The NRC staff summarized a number of ongoing initiatives to make the ROP more effective and efficient, such as improvements to the inspection report development process, improvements to the minor/more-than-minor component of the issue screening process, and work to enhance the NRC’s engineering inspection program. The staff discussed additional ROP enhancement proposals that it received recently as part of the NRC’s transformation initiative from both internal and external stakeholders, including NEI’s March 2018 publication and the National Regional Utility Group’s proposals, which were provided via letter dated May 2, 2018 (ADAMS Accession No. ML18127A080). During this public meeting, industry representatives indicated that they intend to submit another letter to provide specific problem statements and submit proposed enhancements to address those problems. The staff discussed that significant stakeholder engagement would likely be needed to fully evaluate any recommendations, and that it plans on establishing a recurring discussion topic on this subject at monthly ROP public meetings, with a separate focused public meetings on specific ROP enhancements. The staff’s presentation can be found in ADAMS Accession at No. ML18207A517.

Cyber Security Inspection

Staff from the Office of Nuclear Security and Incident Response provided a briefing on the NRC’s Power Reactor Cyber Security Inspection Program. The staff explained the history of the inspection program, which is based on ensuring compliance with Title 10 of the *Code of Federal Regulations* Section 73.54, and the status of the full implementation inspections, which started in 2017.

The staff discussed the make-up of the NRC teams for the 2 week inspections and the process used by the staff to internally review inspection findings through the Cyber Security Issues

Forum. The staff discussed that although 10 inspections have been completed, not all of the inspection reports have been issued. The staff also discussed the process used by the staff and industry to identify areas where guidance may be need to ensure clarity on program implementation requirements. The staff noted that although strong progress has been made to date on guidance development, there are some areas where the staff and industry continue to work on guidance development.

IMC 0609 Revisions

Staff provided an overview of ongoing Inspection Manual Chapter (IMC) 0609 revisions. Staff relayed that IMC 0609, "Significance Determination Process;" IMC 0609, Attachment 1, "Significance and Enforcement Review Panel Process;" IMC 0609, Attachment 2, "SDP Appeal Process;" and IMC 0609, Attachment 5, "Inspection Finding Review Board," are all being revised to incorporate the results of the Inspection Finding Resolution Management trial period and effectiveness review, and to make a few minor adjustments to existing guidance. Those revisions will be issued later this calendar year.

Separately, staff reminded external stakeholders about the ongoing focused self-assessment of the Emergency Preparedness Significance Determination Process (SDP), as outlined in a prior public meeting dedicated to that topic on June 25, 2018. Staff emphasized the aggressive schedule for that assessment, and the importance of receiving timely external stakeholder feedback.

The staff also provided a detailed presentation (ADAMS Accession No. ML18207A537) on proposed revisions to IMC 0609, Appendix D, "Public Radiation Safety Significance Determination Process." During this presentation, staff notified stakeholders of an extension to the public comment period, which will now end on September 20, 2018. In addition, the staff acknowledged a mistake in slide 5 of its presentation, where the possibility of a White finding in the Radiological Environmental Monitoring Program (REMP) area was discussed. In fact, the current SDP does not provide for greater-than-Green findings in the REMP area. Instead, the staff referenced judgements that are made when determining whether failures involving the Radioactive Effluent Release Program should be considered substantial enough to increase the significance of a finding per the SDP.

Next, the staff highlighted ongoing revisions to IMC 0609, Appendix H, "Containment Integrity Significance Determination Process" (to update the document, address internal feedback, and incorporate information related to consequential steam generator tube rupture); IMC 0609, Appendix I, "Operator Requalification Human Performance Significance Determination Process" (to make adjustments based on user feedback); and IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria" (to implement the targeted update described in SECY-18-0045). Stakeholders were told that drafts of IMC 0609, Appendices I and M will be made publicly available in August 2018, and were asked to email Donald.Helton@nrc.gov if they specifically wanted to be notified at the time of document release. The IMC 0609, Appendix H revision will be discussed in more detail at the September ROP public meeting.

NRC Backfit Training

The NRC provided an update on backfit training activities being provided to the staff. Backfit training for the staff is almost complete. In addition, regional points of contact have been established as an initial means to resolving potential backfit concerns that may be identified during the oversight process.

Fukushima Working Group Update

The NRC provided an update on the ROP/Fukushima working group's efforts. Draft ROP program documents have been issued for internal NRC comment. Copies were provided as part of this meeting notice and can also be found in ADAMS at Accession Nos. ML18192A152 and ML18163A232. The NRC expects to finalize the ROP program documents by January 1, 2019.

A member of industry provided feedback that including FLEX equipment in the sample selection under Inspection Procedure 71111.22, "Surveillance Testing," could dilute the procedures current focus on Technical Specification Surveillance Requirements. This feedback was also provided at the March 1, 2018, ROP public meeting (ADAMS Accession No. ML18072A045). This feedback will be considered by the staff as it finalized these updates.

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PUBLIC MEETING HELD ON JULY 19, 2018

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ADAMS ACCESSION NO: ML18214A158***concurred via email**

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DATE	8/ 1 /18	8/ 1 /18

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**REACTOR OVERSIGHT PROCESS PUBLIC MEETING
ATTENDANCE LIST
July 19, 2018**

Ellen Anderson	NEI	Joylynn Quinones	NRC
David Gudger	Exelon	Don Helton	NRC
Marty Murphy	Xcel	Carl Weber	NRC
Kirsten Stokes	PSEG	Dan Merzke	NRC
Greg Halnon	First Energy	Aron Lewin	NRC
Ron Gaston	Entergy	Ravi Grover	NRC
James Slider	NEI	Eric Bowman	NRC
Michael Murray	STPNOC	C.J. Fong	NRC
James Pak	Dominion	Steve Campbell	NRC
Tony Zimmerman	Duke	Dave Garmon	NRC
Erin Anners	SNC	Stephen Beu	NRC
Bryan Ford	Entergy	Don Johnson	NRC
James Polickoski	Tennessee Valley Authority	Robert Krsek	NRC
Rob Burg	EPM	Robert Gladney	NRC
Steve Catron	NextEra Energy	Robert Schaaf	NRC
Robin Ritzman	FENOC	Ed Hackett	NRC
Ken Heffner	Certrec	John Boska	NRC
		Carleen Parker	NRC
		Mike King	NRC
		Mark Miller	NRC
		Greg Bowman	NRC
		Tom Hipschman	NRC
		Julio Lara	NRC
		Josh Wilson	NRC