



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

May 20, 2019

MEMORANDUM TO: Ami R. Agrawal, Branch Chief
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Tekia V. Govan, Project Manager */RA/*
ROP Support and Generic Communication Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY
PUBLIC MEETING HELD ON APRIL 24, 2019

On April 24, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with the Nuclear Energy Institute's (NEI's) Reactor Oversight Process (ROP) Task Force executives, and other senior industry executives, to discuss the staff's progress on the ROP enhancement initiative and other ROP topics.

Updates to Changes to the Engineering Inspection Program

The NRC staff provided a brief overview of the proposed changes to the engineering inspection program. Inspection Procedure 71111.21M, "Design Bases Assurance Inspection (Team)" (DBAI), will become "Comprehensive Engineering Team inspections" (CETI), incorporating the DBAI inspection with Inspection Procedure 71111.17T, "Evaluations of Changes, Tests and Experiments," for Title 10 of the *Code of Federal Regulations* (CFR) Section 50.59 inspections and aspects of Inspection Procedure 71111.07, "Heat Sink Performance." Inspection Procedure 71111.21N, "Design Bases Assurance Inspection (Programs)," currently used for inspecting environmental qualification (EQ), will be called "Focused Engineering Inspections" (FEI) and EQ will be replaced with power-operated valve inspections. Inspection Procedures 71111.05T, and 71111.05XT for triennial fire protection inspections will be replaced with a fire protection FEI.

The new fire protection FEI combines Inspection Procedures 71111.05T and 71111.05XT (used to inspect plants committed to National Fire Protection Association Standard 805 (NFPA 805)) so that only one inspection procedure will be used for either traditional fire protection programs or programs following NFPA 805.

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The NRC staff is currently drafting the new inspection procedures and will make the completed procedures publicly available in June of 2019. The staff is considering additional focused engineering inspection topics, should the Commission approve a four or five-year engineering inspection program cycle.

Proposed Changes to Inspection for ROP Enhancement

The NRC staff discussed the preliminary changes that will be proposed to the NRC Commission for nine inspection procedures as part of the ROP enhancement project (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19107A495). The staff also provided background information on the proposal and the data that was considered for the nine inspection procedures. Revisions to the number of nominal size samples and associated inspection hours for dual unit site were discussed for the following inspection procedures:

- 71111.01, "Adverse Weather Protection"
Proposed change - reduction in summer readiness sample and moving external flood sample to the flood protection procedure
- 71111.04, "Equipment Alignment"
Proposed change - reduction to two partial walkdown samples and one complete walkdown
- 71111.05, "Fire Protection"
Proposed change - increase one sample for fire drill observation
- 71111.06, "Flood Protection Measures"
Proposed change - reduce one sample and move external flood to this procedure only for application to sites that have an external flood hazard
- 71111.13, "Maintenance Risk Assessment and Emergent Work Control"
Proposed change - revise the sample range based on the number of operating units at a site
- 71111.18, "Plant Modification"
Proposed change - reduction of two samples, maintaining the flexibility for inspectors to choose between temporary and permanent modifications, combining procedures
- 71111.19, "Post Maintenance Testing" and 71111.22, "Surveillance Testing"
Proposed change- Combine these two procedures and reduce 24 samples and 84 hours from Inspection Procedure 71111.19 and increase 12 samples and 42 hours to Inspection Procedure 71111.22.
- 71111.02, "Occupational ALARA Planning and Controls"
Proposed change - retirement of the as low as reasonably achievable procedure based on continuous decline in occupational exposure

The staff also discussed recommended changes to the Problem Identification and Resolution (PI&R) procedure. These changes consisted of moving the routine review of the PI&R inspection hours to Inspection Manual Chapter (IMC) 2515, Appendix D, "Plant Status," and

reducing and revising plant status hours based on the number of hours each resident inspector spends on plant status every day. The biennial team inspection frequency is also being proposed to change to triennial and the annual PI&R sample hours are being recommended to change to 12 hours per sample.

Proposed Performance Indicator Assessment Changes

To build on discussions held during the past ROP public meetings, the NRC staff presented additional details and data behind the proposed modification to the treatment of greater-than-Green (GTG) performance indicators (PIs) (ADAMS Accession Nos. ML19107A491 for presentation and ML19112A281 for supporting data). The presentation included background information, an explanation of the current method for treatment of GTG PIs in the assessment process, discussion of historical data showing how GTG findings and PIs have been considered in the assessment process over time, and a recap of the NRC staff's proposed modification to the treatment of GTG PIs.

In reviewing ROP enhancement recommendation 2B.5 (prompt closure of GTG findings), the NRC staff noted that the potential benefits to safety of adopting that recommendation – namely the encouragement of prompt evaluation, correction, and independent verification – did not extend to the treatment of GTG PIs. The NRC staff has noted a diverging trend in the time it takes for licensees to be ready for supplemental inspections. The time for readiness for supplemental inspections in response to GTG findings has been steadily decreasing whereas the time for readiness for supplemental inspections in response to GTG PIs has notably increased. From 2016 to 2019, the average readiness time for supplemental inspections in response to GTG PIs was more than three times longer than for GTG findings. The proposal to modify the treatment of GTG PIs in the assessment process is intended to similarly encourage prompt evaluation, correction, and independent verification, and to ensure such prompt action by licensees is recognized in the assessment process. The NRC staff plans to include this proposal in the ROP enhancement SECY paper.

Although industry representatives acknowledged that the staff had made a compelling case with respect to the timeliness of licensee completing actions necessary to close GTG PIs, they expressed a view that other alternatives should be explored other than the one the staff has proposed.

Reactor Oversight Process Performance Indicator Program Frequently Asked Question (FAQ)

The NRC staff discussed FAQ 19-01, "Change to NEI 99-02 Text for the Drill/Exercise Performance Indicator – Initial Notification Form Accuracy Criteria" (ADAMS Accession No. ML19119A304). Implemented in FAQ 19-01 are the terms of an accepted whitepaper (ADAMS Accession No. ML18254A366) and the proposition to revise the guidance for assessing the accuracy of initial notification forms as stated in the FAQ. The status of FAQ 19-01 was changed to tentatively approved during this meeting.

NEI's Response Letter to the March 27, 2019 ROP Public Meeting

NEI informed the NRC staff that they are still developing a letter that will document their views about certain topics discussed during the March 27, 2019 ROP enhancement meeting. NEI expects to submit this letter to the NRC before the next ROP monthly meeting on May 22, 2019.

Emergency Preparedness (EP) Significance Determination

The NRC staff discussed NEI's recommendation to consider the other ROP cornerstones when determining the significance of an EP finding. The staff concluded that they needed to further assess the recommendation prior to determining whether it should be pursued. Additionally, the staff discussed that they were pursuing NRC Commission approval to base the significance of the 16 planning standards of 10 CFR 50.47(b) upon their impact on public health and safety and not upon a finding's level of compliance with its associated regulation.

Ongoing Significance Determination Process Updates

The NRC staff continues to receive internal comments on IMC 0609, Appendix A, "The Significance Determination Process for Findings At-Power," and IMC 0609, Attachment 4, "Initial Characterization of Findings." The staff anticipate addressing all internal comments and making the draft(s) publicly available in advance of the next ROP public meeting, tentatively scheduled for May 22, 2019. The staff intends to provide an overview of the proposed changes and receive additional feedback from external stakeholders at the next ROP meeting.

The NRC staff plans to revise IMC 0609, Appendix G, "Shutdown Operations Significance Determination Process." This revision will improve the usability of Attachment 2, "Phase 2 Significance Determination Process Template for PWR during Shutdown," and Attachment 3, "Phase 2 Significance Determination Process Template for BWR during Shutdown." The update will also include revisions for new reactor designs.

Based on the direction of the NRC Commission, the NRC staff is reviewing IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria," to ensure that it is applicable for new reactor designs. Currently, the staff does not anticipate that a revision to this appendix will be needed to accommodate new reactor designs.

Next Steps – Longer-Term ROP Enhancement

The NRC management provided an overview of ongoing and longer-term ROP enhancement activities, as follows:

- Reviewing in a holistic manner the PI&R Program
- Assessing the effectiveness of Cross-Cutting Issues Program
- Optimizing radiation protection inspection procedures
- Dispositioning recommendations from the emergency preparedness focused self-assessment
- Improving various aspects of the Significance Determination Process
- Evaluating potential changes to the Performance Indicator Program
- Optimizing Independent Spent Fuel Storage Installation inspections

Conclusion

At the end of the meeting, NRC and industry management gave closing remarks. NEI expressed appreciation for the open dialogue and willingness of NRC staff to hear industry views, even in areas where NRC staff and industry may not be aligned. The NRC management stressed the importance of NRC being focused on providing reasonable assurance of public health and safety when considering changes to the ROP. NEI reiterated that they plan to provide a letter to the NRC documenting their views about certain topics discussed during the March 27, 2019 ROP enhancement meeting. The NRC staff anticipates receiving this letter prior to the next ROP meeting on May 22, 2019.

The enclosure provides the attendance list for this meeting.

Enclosure:

As stated

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC
MEETING ON APRIL 24, 2019 DATED

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ADAMS Accession No.: ML19134A334

*OFFICE	NRR/DIRS/IRGB/PM	NRR/DIRS/IRAB/TR	NRR/DIRS/IRAB/TR	NRR/DIRS/IRGB/OLA	NRR/DIRS/IRAB/BC
NAME	TGovan	AGarmoe	RGibbs	IBetts	AAgrawal
DATE	05/07/2019	05/07/2019	05/09/2019	05/20/2019	05/20/2019

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LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING

April 24, 2019, 8:30 AM to 12:30 PM

NRC One White Flint North
11555 Rockville Pike
O-11B04
Rockville, MD

Name	Organization	Name	Organization
Mike Murray	STP	Chris Miller	NRC
Marty Murphy	Xcel Energy	Billy Dickson	NRC
Jim Slider	NEI	Greg Bowman	NRC
George Gelrich	Exelon	Tom Hipschman	NRC
Larry Parker	STARS Alliance	Alex Garmoe	NRC
Terry Reiss	Southern Nuclear	Russ Gibbs	NRC
Jerry Bonanno	NEI	Doug Bollock	NRC
Ellen Anderson	NEI	Ami Agrawal	NRC
Deann Raleigh	Curtiss Wright	David Aird	NRC
Steve Catron	NextEra	Joylynn Quinones	NRC
Ron Gaston	Entergy	Clay Johnson	NRC
Mandy Halter	Entergy	Bob Kahler	NRC
Dave Young	NEI	Mike Montecalvo	NRC
Ken Heffner	Certrec	Dan Merzke	NRC
Tony Zimmerman	Duke	Steve Campbell	NRC
Robin Ritzman	FENOC	Jeff Mittman	NRC
Lenny Sueper	Xcel Energy	Rob Krsek	NRC
Dean Burnett	Entergy	Eric Ruesch	NRC
Roy Linthicum	PWR Owners Group	Geoff Miller	NRC
Dave Mannai	PSEG Nuclear	Ray Kellar	NRC
Rob Burg	EPM, Inc.	Laura Kozak	NRC
Matt Sunseri	Public	Alonzo Richardson	NRC
Steven Dolley	S&P Global Platts	Eric Thomas	NRC
		Annie Mayer	NRC
		Ken Kolaczyk	NRC
		Jeff Bream	NRC
		Derek Widmayer	NRC

Enclosure