



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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February 5, 2020

MEMORANDUM TO: Dennis C. Morey, Chief  
Licensing Processes Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager */RA/*  
Licensing Processes Branch  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF NOVEMBER 12, 2019, CLOSED PRE-SUBMITTAL  
MEETING WITH WESTINGHOUSE ELECTRIC COMPANY TO  
DISCUSS THE TOPICAL REPORT RELATED TO REMOVING THE  
TECHNICAL SPECIFICATION REQUIREMENTS FOR THE COMMON  
QUALIFICATION SYSTEM (EPID L-2019-TOP-0042)

On November 12, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff held a closed, pre-submittal meeting with representatives of Westinghouse Electric Company (Westinghouse). The meeting was a pre-submittal meeting to discuss WCAP-18461, "Common Q Platform Elimination of Technical Specification Surveillance Requirements." Information related to the meeting can be found in the Agencywide Documents Access and Management System Package Accession No. ML19295F875.

In the meeting, Westinghouse representatives made a presentation on the basis for the proposed topical report (TR). During the discussion, the NRC staff and Westinghouse representatives engaged in numerous clarifications and questions and answers.

One point raised by the NRC staff was consistency between the report title and the proprietary scope documented in the report. Westinghouse agreed that the two were not completely aligned and took an action from the meeting to consider retitling the report and making the scope nonproprietary. The latter would then provide a clear understanding of the content of the report, so no misconceptions could come from the title.

The staff also noted that there were other Westinghouse TRs that dealt with surveillance test exemptions for specific platforms. The NRC staff questioned why there was a need for this TR. Westinghouse explained that none of the other TRs dealt with the Common Qualification (Common Q) platform.

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CONTACT: Joseph Holonich, NRR/DORL  
301-415-7297

In addition, Westinghouse elaborated that this TR was intended to provide a basis for referencing in plant-specific licensing actions. The NRC staff asked if this matter was going to be considered by the Technical Specifications Task Force (TSTF). Westinghouse stated that they had not considered this for the TSTF and that there were no planned changes to the Standard Technical Specifications (STS). Changes to STS were instead being considered as a separate effort. However, WCAP-18461 will show what changes to individual plant STS will be needed.

The NRC staff asked about performing surveillance activities on the diagnostics functions themselves. Westinghouse responded that licensees were not expected to perform such surveillance activities and that WCAP-18461 will include an explanation for why such surveillance activities are unnecessary. It was also explained that system monitoring activities such as system engineer walkdowns could still be performed but these activities would be optional and performed at the discretion of the licensee. The staff stated that a justification would need to demonstrate that and (1) successful performance of system diagnostic monitoring activities will provide reasonable assurance that all credited system diagnostics are functioning correctly and (1) system diagnostic monitoring activities will be reliably performed and documented by the licensee.

When the technical discussions were finished, Westinghouse discussed the desired schedule. Westinghouse noted that during a public workshop on October 24, 2019, the NRC staff presented options for conducting TR reviews (ADAMS Package Accession No. ML19275G968). Westinghouse asked if the review of WCAP-18461 could be done under the simplified safety evaluation (SE) option.

The NRC staff explained that there was a flowchart showing when a simplified SE could be used. In its submittal of WCAP-18461, Westinghouse should address the questions that need to be answered to determine if a simplified SE could be used.

In addition, the staff noted that the modified TR review process could be used in this evaluation. This option entails development of a draft SE with open items and there would be no requests for additional information.

The lone action from the meeting was for Westinghouse to consider retitling the report and making the scope nonproprietary.

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**ADAMS Accession Nos.:****PKG: ML19295F875****Summary: ML19304A093**

\*concurrence via email

OFFICE	NRR/DORL/LLPB/PM*	NRR/DORL/LLPB/LA*	NRR/DE/EICB/BC*
NAME	JHolonich	DHarrison	MWaters
DATE	01/14/2020	01/28/2020	02/05/2020
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NAME	DMorey	JHolonich	
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