



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 17, 1996

MEMORANDUM TO: David B. Matthews, Chief
Generic Issues and Environmental
Projects Branch
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

FROM: Stewart L. Magruder, Project Manager *Stewart L. Magruder*
Generic Issues and Environmental
Projects Branch
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 20, 1996, MEETING WITH THE
NUCLEAR ENERGY INSTITUTE

On August 20, 1996, representatives of the Nuclear Energy Institute (NEI), the Electric Power Research Institute (EPRI), and several licensees met with representatives of the Nuclear Regulatory Commission (NRC) at the NRC's offices in Rockville, Maryland. Attachment 1 provides a list of meeting attendees.

The purpose of the meeting was to discuss Draft Revision A of NEI 96-07, "Guidelines for 10 CFR 50.59 Safety Evaluations," which was submitted for staff review by NEI letter dated August 13, 1996. NEI opened the meeting by stating that this document was an update to NSAC-125, and that it was submitted with the intention of stimulating dialogue between the industry and the staff on 50.59 issues. NEI indicated that they were responding to two issues raised within the past year by the staff. The issues are, as follows: the scope of 50.59 reviews (i.e. whether changes that are not explicitly described in the FSAR should be included); and the use of compensatory measures that outweigh any potential increase in probability of occurrence or consequences or reduction in margin. The only changes from NSAC-125 are related to the second issue and are highlighted in Sections 3.4, 3.5, 3.6, and 3.8.

NEI stated that they have a working group that meets to discuss 50.59 issues and that the original intent of the group was to combine NEI's commitment management guidance with a major update to NSAC-125. Although the group has not yet completed this task, NEI decided to submit the draft document to try to respond to the issues raised by the staff and to try to get approval of a document so that the industry and the staff can start discussions from common ground. NEI stated that their goal is still to make additional improvements to the document in the future.

NEI next made a presentation on the safety review process and the industry philosophy on the margin of safety issue. They presented several examples of situations in which, they felt, extra margin exists between values listed in the FSAR and those found acceptable in an SER and industry standards. NEI

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JCanady, RII

CMiller

restated the industry position that a nonconservative change in the value of a parameter listed in the FSAR does not constitute an increase in the consequences of an accident or a decrease in the margin of safety provided that the new value is still less than the acceptable value listed in the SER. The group then discussed the use of new models by licensees to perform safety analyses. It was agreed that licensees should use new assumptions in the old model for the 50.59 analysis. The use of compensatory actions was also discussed. NEI used an example of increasing the test interval for a component but compensating by focusing the tests on parts that have a history of causing failures. The NEI handouts are included as Attachment 2.

The staff next raised the concern that some licensees have good 50.59 processes but don't do a good job of recognizing what changes should be subject to the process. NEI responded that the industry is aware of the problem and is encouraging licensees to conduct more training for their employees on the subject.

The next major topic of discussion was Enclosure 1 to the August 13, 1996, letter from NEI. The enclosure listed NRC points made at a July 23, 1996, Nuclear Strategic Issues Advisory Committee meeting along with the industry position for each point. The group had a long discussion of the requirements of 10 CFR 50.71(e). No consensus was reached, however, it was decided that the scope of an FSAR may have to be expanded. The next subject was the definition of licensing basis. NEI stated that they generally agree with the 10 CFR Part 54 definition. They believe, however, that voluntary commitments from licensees that are not required by regulations should not be part of the licensing basis. The final subject of the meeting was a brief discussion of non-conforming conditions. The staff emphasized the importance of addressing issues in a timely manner and tracking items effectively. NEI responded that they believe that Section 4.0 "Evaluation Process Guidance," of NEI 96-07 effectively addresses this issue.

The meeting concluded with a commitment from the staff to review NEI 96-07 and agreement by all parties that further discussions are required to resolve these issues.

Project No. 689

Attachments: As stated

October 17, 1996

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NRC/NEI MEETING ON
10 CFR 50.59 ISSUES
LIST OF ATTENDEES
August 20, 1996

<u>NAME</u>	<u>ORGANIZATION</u>
Doug Walters	NEI
Steve Floyd	NEI
Steven Root	Edison International
Carter Rogers	Arizona Public Service Co.
Roger Walker	Texas Utilities Electric
Alan Passwater	Union Electric
Jack Haugh	EPRI
Margo Barron	NUS/LIS
Bob Fraser	Northern States Power Co.
William Cross	Southern Technical Services
Ken Wilson	Florida Power Corp.
Mark Beaumont	Westinghouse
Mike Schoppman	Florida Power & Light
Tricia Heroux	EPRI
Frank Lentine	Commonwealth Edison
Joe Hegner	Virginia Power
Chuck Coker	Edison International
Bob Newkirk	Detroit Edison
Jeb Deloach	Northeast Utilities
Jerry Wilson	NRC/NRR/DRPM
David Matthews	NRC/NRR/DRPM
Eileen McKenna	NRC/NRR/DRPM
George Thomas	NRC/NRR/DSSA
John Schiffgens	NRC/NRR/DSSA
David Wigginton	NRC/NRR/DRP
Janice Moore	NRC/OGC
Catherine Marco	NRC/OGC
Chris Grimes	NRC/NRR/DRP
Brian Grimes	NRC/NRR/DRPM
James Canady	NRC/Region II
Christopher Miller	NRC/OCM
Stu Magruder	NRC/NRR/DRPM

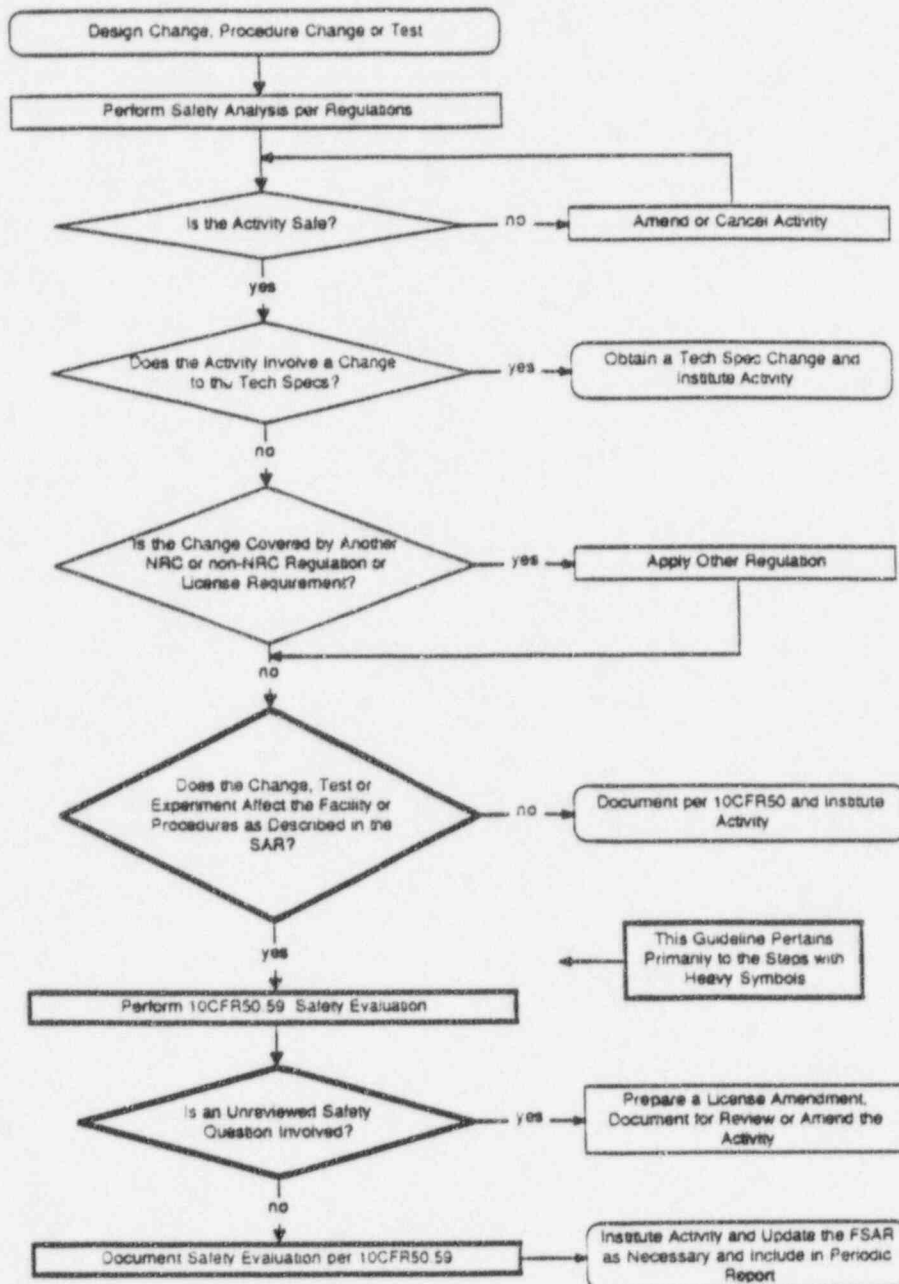
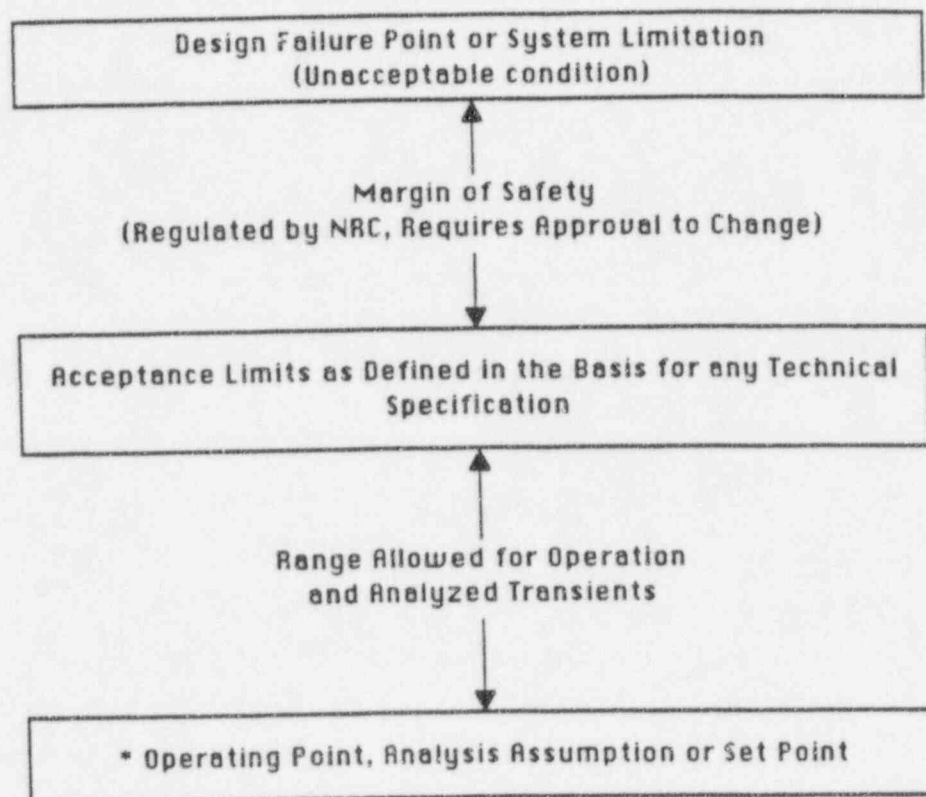


Figure 1-1. Safety Review Process

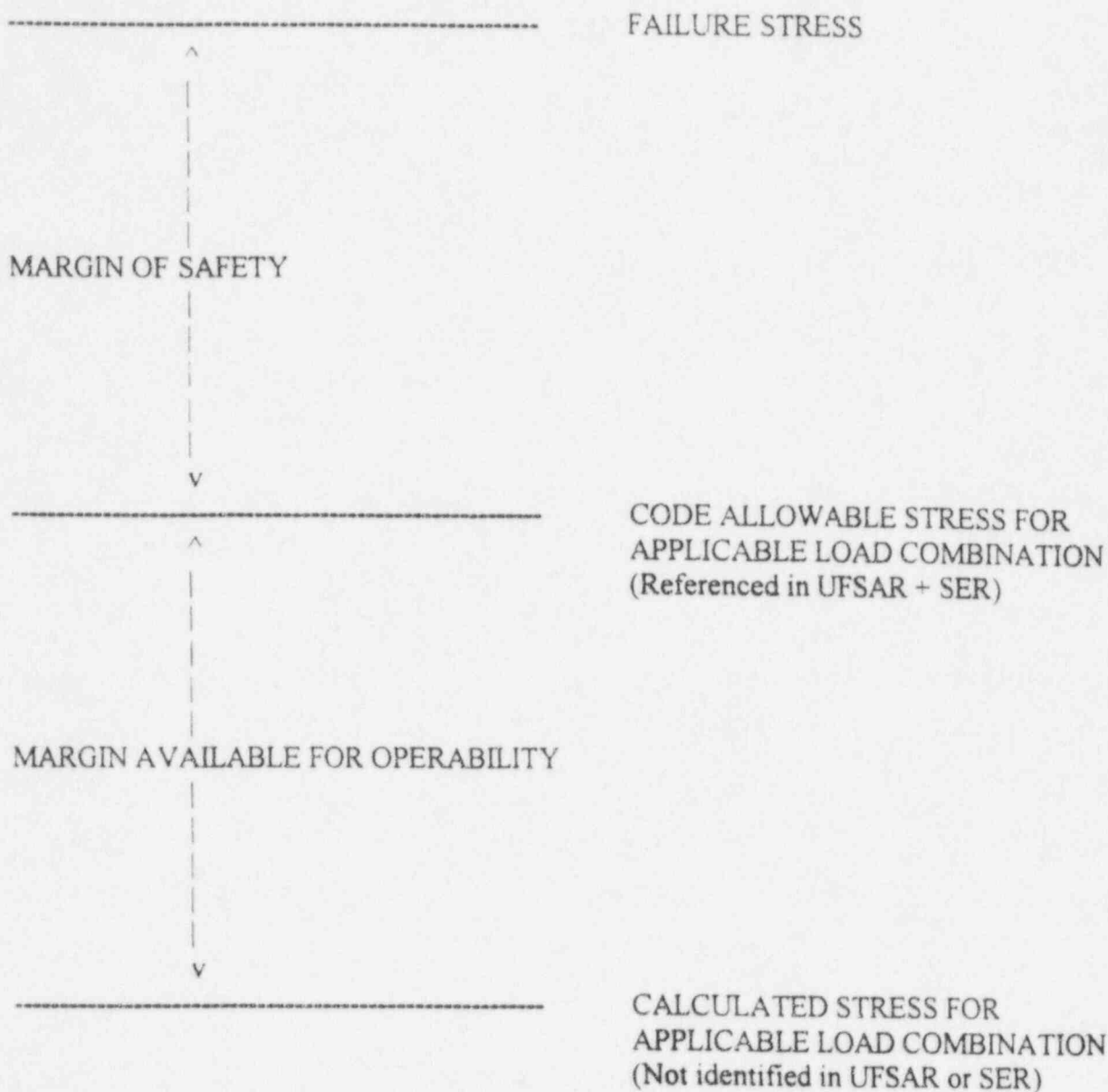


* May be reallocated without prior NRC approval using consistent methods approved by the NRC if all parameters remain within previously approved acceptance limits and meet technical specifications.

Figure 3-1. Relationship of Limits, Operating Points and Margin of Safety

Margin of Safety Example:

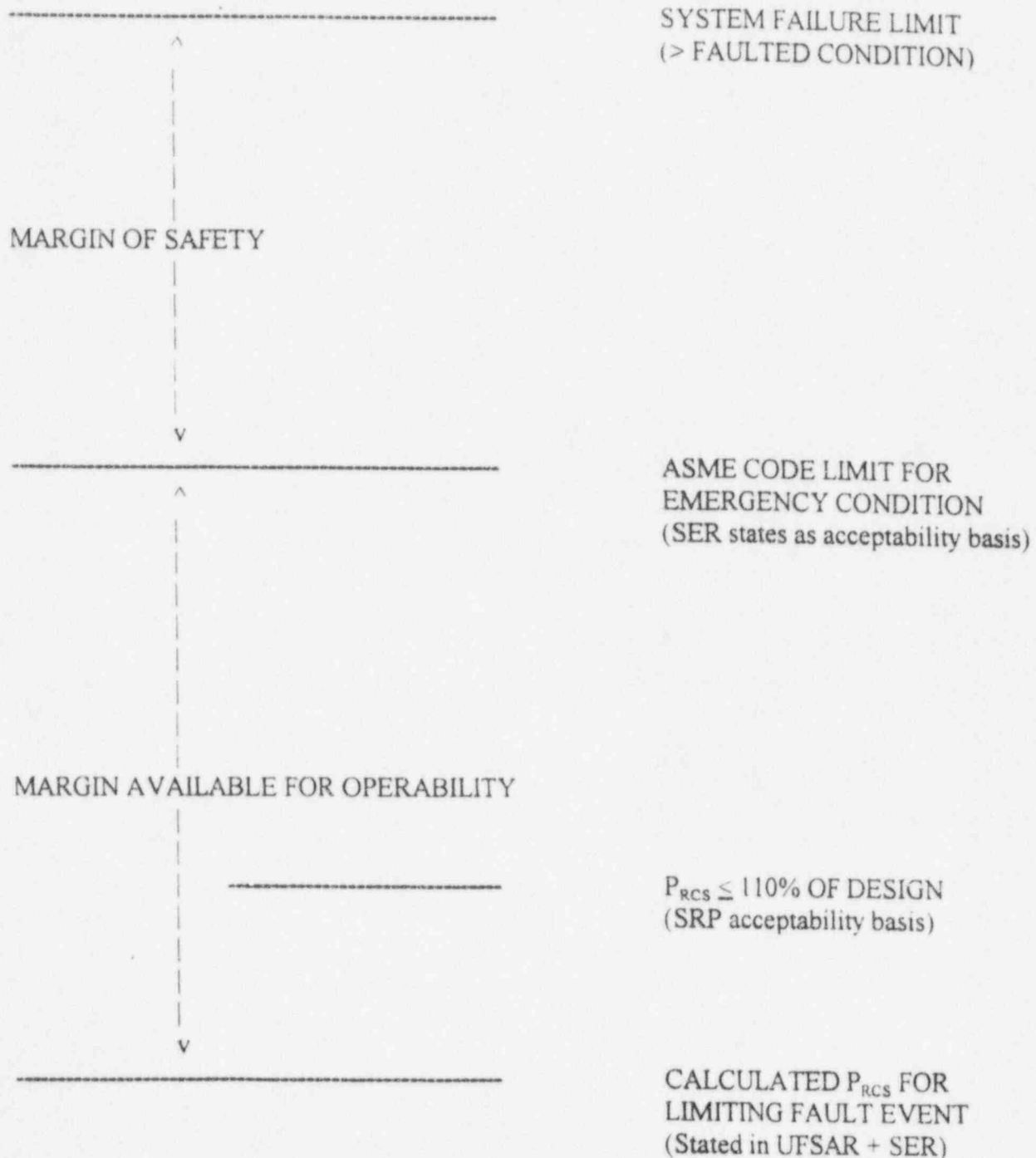
STRESSES IN PIPING, EQUIPMENT AND SUPPORTS



Example: ASME III Class I loading combination for seismic + LOCA. SER states acceptability based on < code allowable; does NOT say acceptability is based on margin between calculated value and limit.

Margin of Safety Example:

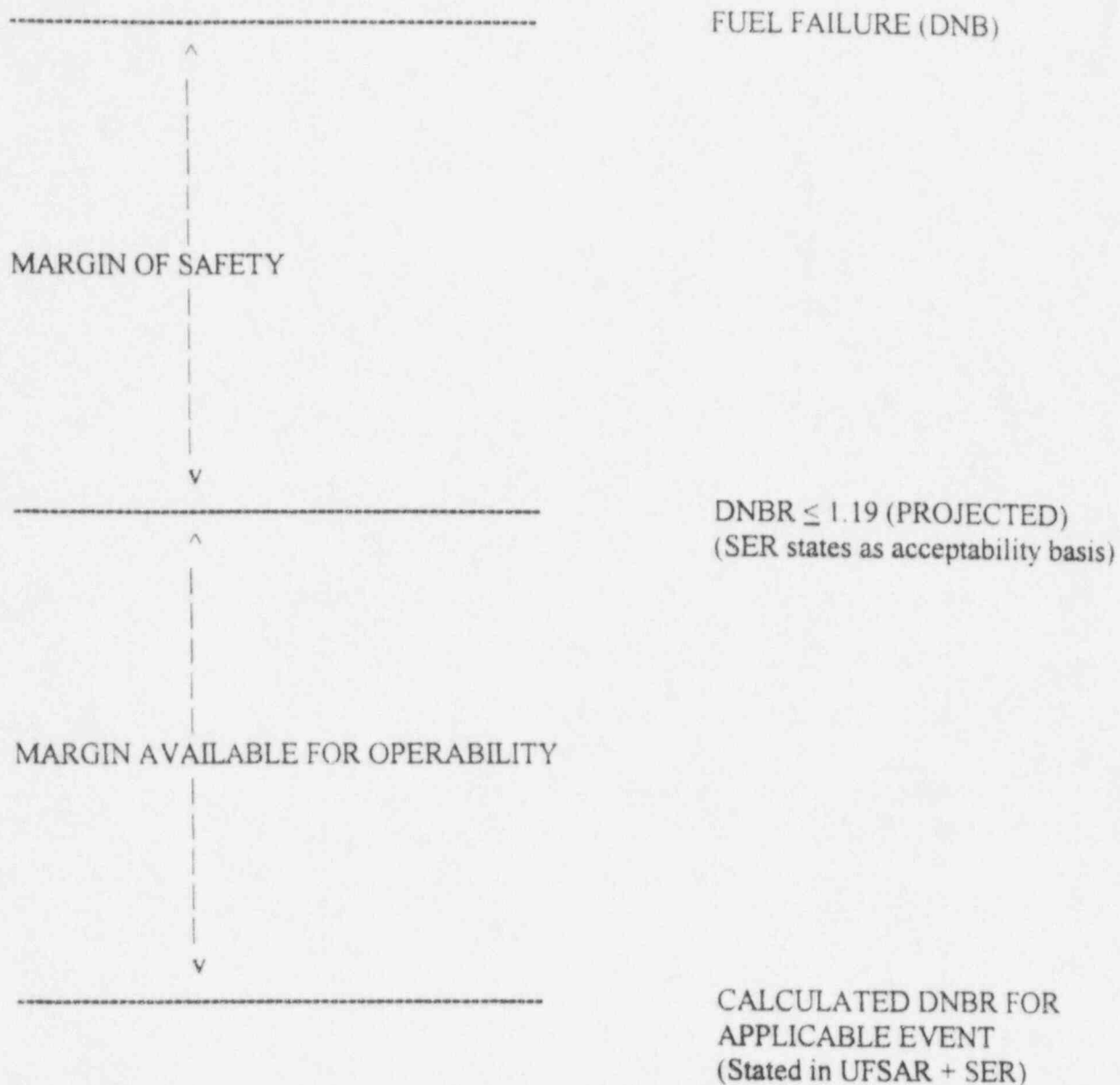
ACCIDENT CONSEQUENCES ($P_{RCS} > \text{REGULATORY LIMIT}$)



Example: Feedwater line break event. SER states acceptability based on consequences $<$ code allowable; does NOT say acceptability is based on margin between calculated and code allowable.

Margin of Safety Example:

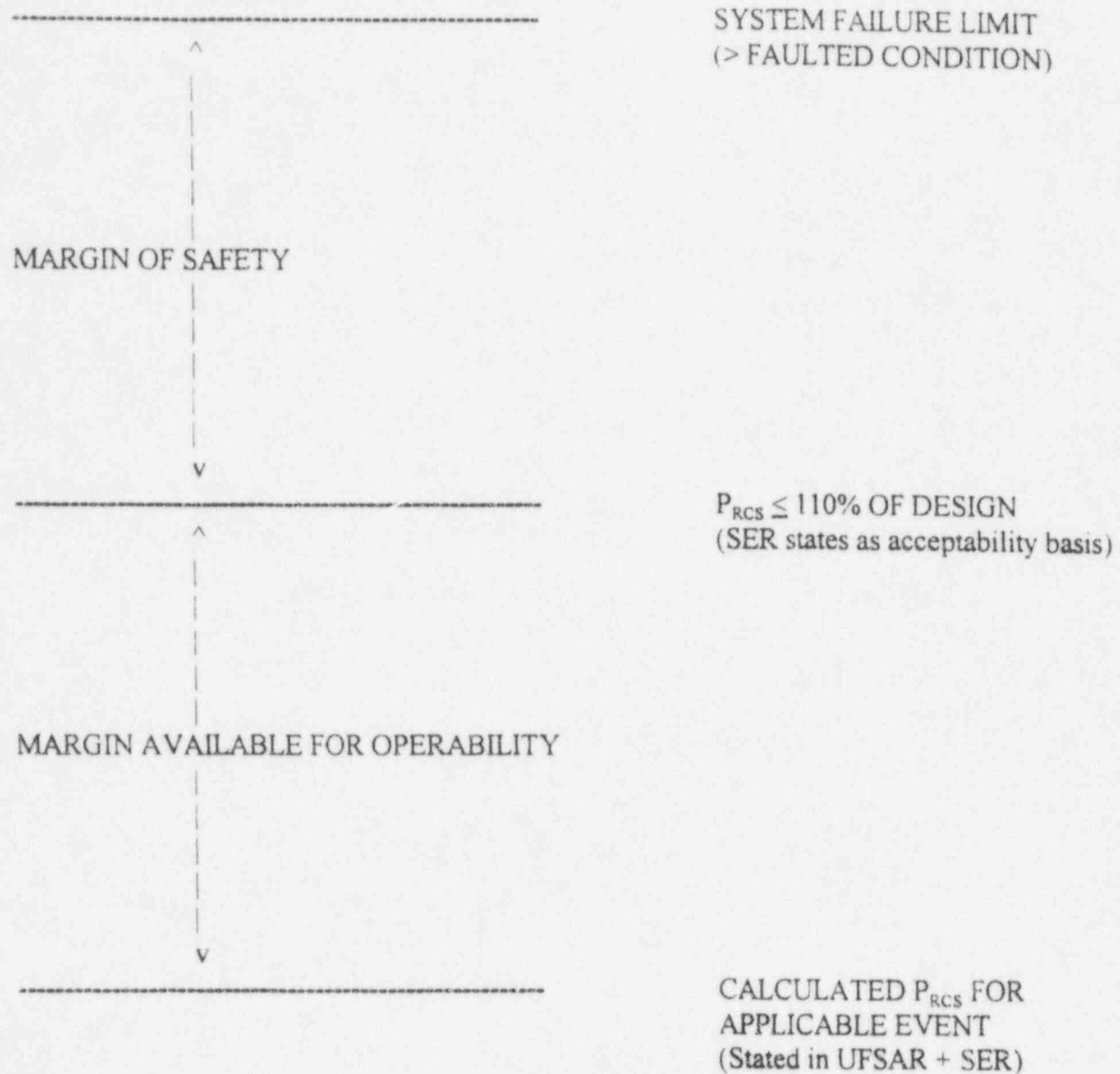
ACCIDENT CONSEQUENCES (DNBR)



Example: Decrease in heat removal event. SER states acceptability based on DNBR $>$ 1.19; does NOT say acceptability is based on margin between calculated value and limit.

Margin of Safety Example:

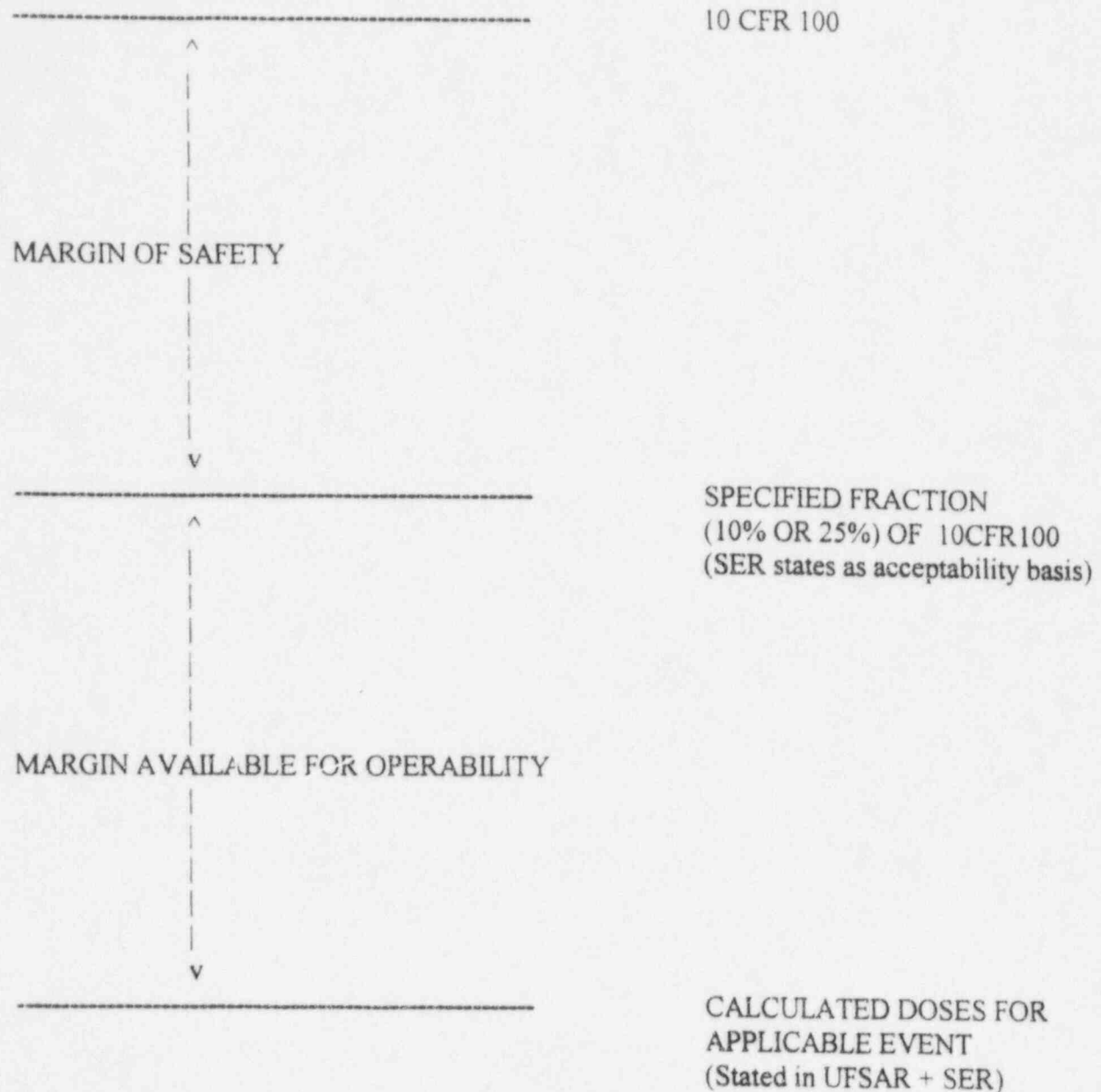
ACCIDENT CONSEQUENCES (RCS PRESSURE)



Example: Decrease in heat removal event. SER states acceptability based on consequences < 110% of design; does NOT say acceptability is based on margin between calculated value and limit.

Margin of Safety Example:

ACCIDENT CONSEQUENCES (NON-LOCA DOSE)



Example: Steam Generator Tube Rupture event. SER states acceptability based on dose meeting "small fraction of 10 CFR 100"; does NOT say acceptability is based on margin between calculated value and limit.

NEI

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