

Feedback on proposed ROP changes

September 23, 2021



SUMMARY

- NEI understands the direction that NRC is headed with current strategy but we have questions on actions & engagement
- We agree that there are improvements that could be gained through incorporation of operating experience including more recent experience
- We agree that there are areas that were included in the SECYs that are no longer being recommended or were already completed
- We appreciate the opportunity to provide any new insights and provide perspectives on relative importance

SECY-18-0113

- We do not see any new information that would change our position on the original recommendations
- We acknowledge that use of licensee self-assessments are no longer being pursued
- As a result of the NRC request during the last public meeting, NEI has identified an area that warrants additional consideration for the scope of the triennial fire protection inspection (TFPI)
 - The NEI fire protection task force will reach out to the applicable technical staff to discuss

TRIENNIAL FIRE PROTECTION INSPECTION (TFPI)

- NEI Fire Protection Task Force re-evaluated Fire Protection recommendations in SECY-18-0113 and SECY-19-0067
- Attributes of the TFPI are redundant to attributes of other NRC inspections
 - IP 71111.05, Fire Protection
 - IP 71111.18, Plant Modifications
 - IP 71111.21M, Design Basis Assurance Inspection (Team)
- Continuing to see low numbers of Fire Protection findings based on industry performance
- Ready to engage NRC staff with the following recommendation:
 - Reallocate unique TFPI inspection criteria to CETI and IP 71111.05, Fire Protection

SECY-19-0067

- We do not see any new information that would change our position on the original recommendations
- We do have some questions on actions and engagement

Status of Plans for Reporting Guidance Applicable to Plants with Risk-Informed Licensing Bases

September 23, 2021



REPORTING GUIDANCE

- NEI task force is developing guidance on how to apply reporting requirements for licensees with risk-informed licensing bases
- For example,
 - 50.69(b)(1)(vii) and (viii) provide an explicit exemption to 10 CFR 50.72 and 50.73 respectively for RISC-3 and RISC-4 components
 - 50.69(g) requires LER under 50.73(b) for any event or condition that prevented, or would have prevented, a RISC-1 or RISC-2 SSC from performing a safety significant function.
- Other risk informed initiatives would also benefit from additional reporting guidance

STATUS

Actions complete/in-progress

- Draft guidance developed
- Initial regulatory affairs review completed
- Industry operations tabletop performed
- Incorporate feedback from tabletop –in progress

Next Steps

- NEI regulatory and legal review of updated draft guidance – Oct, 2021
- NEI/NRC workshop – Late Fall
 - We are interested in engaging the NRC staff for feedback