

From: Benner, Eric
Sent: Friday, October 01, 2021 10:57 AM
To: Nolan, Caty
Cc: De Messieres , Candace; Umana, Jessica; Morton, Wendell; Johnson, Clay; Benner, Eric
Subject: REQUEST: Closeout of TICKET SRM-S16-0068-3

Caty,

SRM-S16-0068-3 tasked the staff to, "Revise the Reactor Oversight Process to provide periodic oversight of industry's implementation of the OPC initiative." The staff believes the special instruction for a SECY Paper under ticket SRM-S16-0068-3 may have been intended for ticket SRM-S16-0068-2 and the "-2" ticket can be updated as such. This is consistent with the planned process for closure of the overall OPC issue as well as the approved schedule milestones for each action. Closure of the "-2" ticket would appropriately necessitate a SECY paper which would close out the SRM itself, as per the Commission's direction. In lieu of a SECY paper, NRR believes this e-mail provides sufficient basis to document closure of ticket SRM-S16-0068-3 as well as satisfying the intent of the special note which is to inform the Commission of OPC issue resolution progress. As this item is due today, we appreciate any assistance you can provide in closing this item.

In response to this tasking, the staff implemented the following ROP Inspection Procedures (IPs) and Inspection Manual Chapter (IMC) revisions:

- IP 71111.04 (ML21032A255); Issue Date: 3/29/21; CN: 21-015; Effective Date: 7/1/21
- IP 71111.12 (ML21040A148); Issue Date: 3/31/21; CN: 21-016; Effective Date: 7/1/21
- IP 71111.18 (ML21040A185); Issue Date: 3/31/21; CN: 21-016; Effective Date: 7/1/21
- IP 71111.22 (ML21033A557); Issue Date: 3/29/21; CN: 21-015; Effective Date: 7/1/21
- IMC 2515 Appendix D (ML20323A037); Issue Date: 1/13/21; CN 21-004; Effective Date: 1/13/21
- ADAMS Package (ML21035A185)
- Document for Comment Memo (ML21036A079)

The specific revisions made to each IP and IMC are discussed below.

IP 71111.04, 03.01.c (Partial Walkdown Sample – Specific Guidance): For the offsite power system, verify the licensee has established and continues to implement periodic walkdown activities to detect visible open phase conditions for switchyard equipment such as insulators, disconnect switches, and transmission line and transformer connections, associated with the offsite power circuits. [C1]

IP 71111.04, 03.05.e(5) (Complete Walkdown Sample – Specific Guidance): ...For the offsite power system, verify the licensee has established and continues to implement periodic walkdown activities to detect visible open phase conditions for switchyard equipment such as insulators, disconnect switches, and transmission line and transformer connections, associated with the offsite power circuits. [C1]

IP 71111.12, 03.01.d(8) (Maintenance Effectiveness – Specific Guidance): For this sample, inspectors should consider selecting a sample to verify that the licensee's Open Phase Isolation System (OPIS) protection components are maintained in accordance with station procedures

and maintenance program. [C1] Licensee's implemented a voluntary industry initiative (ADAMS Accession No. ML19163A176) to address potential open phase condition concerns identified in Bulletin 2012-01, "Design Vulnerability in Electric Power System" (ADAMS Accession No. ML12074A115) that included either an automatic protection system or manual operator monitoring and actions. Verify that the licensee's maintenance, including periodic tests, calibrations, setpoint verifications and inspections, is effective so that the OPIS or monitoring equipment will perform its intended function when required.

IP 71111.18-02 (General Guidance): Licensee's implemented a voluntary industry initiative (ADAMS Accession No. ML19163A176) to address potential open phase condition concerns identified in Bulletin 2012-01, "Design Vulnerability in Electric Power System" (ADAMS Accession No. ML12074A115) that included either an automatic protection system or manual operator monitoring and actions. If available, licensee modifications to either the automatic protection systems or control room monitoring systems should be selected as samples. [C1]

IP 71111.22, 03.01(9) (Surveillance Test – Specific Guidance): ...To determine whether open phase condition (OPC) detection and protection circuits (as applicable) are functional, review OPC alarm setpoints and alarm response procedure(s) to verify whether operators can take timely manual actions consistent with the licensee's commitments to the OPC Voluntary Industry Initiative. [C2]

IMC 2515 Appendix D, 07.01(8) (Guidance – Control Room Walkdown): Observe equipment and/or operator actions for Open Phase Condition monitoring as specified by licensee commitments or NRC requirements.

Note: C1 and C2 denotes that this revision was associated with Commission direction, which in this case was the SRM for the SECY.

These IPs and IMC were shared with NRR and all four regions for comment prior to issuance in accordance with IMC 0040. Comments that were received were reconciled prior to final issuance.

The revisions were also discussed in an ROP Public meeting on 2/24/21 ([Meeting Notice ML21050A249](#) and [presentation slides](#)).