



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

May 27, 2022

MEMORANDUM TO: Antonios M. Zoulis, Chief
PRA Oversight Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Siva P. Lingam, Project Manager */RA/*
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 21, 2022, PUBLIC MEETING WITH
PRESSURIZED WATER REACTOR OWNERS GROUP, AND
INDUSTRY TO DISCUSS THE APPLICABILITY OF GENERIC
ISSUES UNDER RISK-INFORMED PROCESS FOR
EVALUATIONS (EPID L-2022-PMP-0004)

On April 21, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff held an Observation public meeting with the Pressurized Water Reactor Owners Group (PWROG) and Industry representatives to discuss the generic applicability of the risk-informed process for evaluations (RIPE-G) being developed by the PWROG. The meeting notice and agenda, dated April 7, 2022, are available in the Agencywide Documents Access and Management System (ADAMS) under Accession No. ML22097A248. A list of attendees is provided in the enclosure.

The slides presented for this public meeting by the PWROG are available in ADAMS under Accession No. ML22110A024. PWROG presented the following topics:

- Revision of the current NRC plant-specific RIPE process for resolution of generic issues.
- Application of RIPE-G for topical reports (TRs).
- Introduction of the Generic Assessment Evaluation Team (GAET) in place of the plant-specific Integrated Decision-Making Panel (IDP).

PWROG mentioned that the GAET team will consist of experts from plant operations, probabilistic risk assessment (PRA), engineering, licensing, safety analysis, and any other experts as needed. The GAET will evaluate and confirm the generic applicability of issues for RIPE-G.

The NRC staff expressed the following concerns/comments:

- The NRC streamlined process for RIPE (ADAMS Accession No. ML22088A135), which is very different from the RIPE-G concept, leverages the existing risk framework such as prior NRC-approval of Technical Specifications Task Force (TSTF) Traveler TSTF-505, "Provide Risk Informed Extended Completion Times – RITSTF [Risk-Informed TSTF]

Initiative 4b”¹ or TSTF-425 “Relocate Surveillance Frequencies to Licensee Control-RITSTF Initiative 5b,” and an established IDP by having an approved and implemented Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.69, “Risk-informed categorization and treatment of structures, systems and components for nuclear power plants,” as described in the Office of Nuclear Reactor Regulation Temporary Staff Guidance (TSG)-DORL-2021-01, Revision 1, “Risk-Informed Process for Evaluations” (ML21180A013), which gives confidence for NRC staff in the licensee’s existing PRA quality. RIPE-G seems to be leveraging mainly the GAET, which is a newly introduced concept. The NRC staff was not clear about the PWROG’s intent on whether it was seeking NRC’s approval/endorsement of a new framework and/or how this would be represented in a TR.

- Requirements for an IDP are currently described in 10 CFR 50.69 and Nuclear Energy Institute (NEI) guidance, “NEI Guidelines for the Implementation of the Risk-Informed Process for Evaluations Integrated Decision-Making Panel” (ML20245E147). Will there be a published document outlining similar information for the GAET?
- The RIPE-G process should be clearly defined to determine what types of documents (TRs, regulatory guides, White Papers, etc.) for NRC review apply to RIPE-G and which ones do not.
- Expected use of qualitative risk versus items that are clearly within PRA (i.e., quantitative numbers for core damage frequency and large early release frequency).
- What types of TRs might be going through RIPE-G and how would they be used by a licensee in a licensing action request?
- PWROG should recognize that if the PWROG is expecting that the NRC staff would be conducting an expedited review of a proposed generic TR, the technical information described in the generic TR should not include new design or design evaluation methodologies that were not previously reviewed by the staff. Implementation of new design or design evaluation methodologies would require a normal topical report staff review process and schedule.
- For the pilot TR being discussed in the GAET “Asymmetric Natural Circulation Cooldown Dose Consequences for Main Steam Line Break Outside Containment,” the assumptions of bounding reactor coolant system activity and primary to secondary leakage for the main steam line break accident should be provided in the TR, and be specified in the limitations and conditions.

¹ NRC has approved some licensee programs for risk-informed initiatives consistent with NEI 06-09, “Risk-Informed Technical Specifications Initiative 4b, Risk-Managed Technical Specifications (RMTS) Guidelines” and NEI 04-10, “Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies,” which can be used in lieu of TSTF-505 or TSTF-425, respectively, for RIPE. Any references in this TSG to TSTF-505 and TSTF-425 also include NEI 06-09 and NEI 04-10, respectively.

No comments were provided by members of the public. No regulatory decisions or commitments were made at the meeting.

Please direct any inquiries to me at (301) 415-1564 or by email at Siva.Lingam@nrc.gov.

Enclosure:
List of Attendees

LIST OF ATTENDEES

APRIL 21, 2022, PUBLIC MEETING WITH

PRESSURIZED WATER REACTOR OWNERS GROUP

AND INDUSTRY

TO DISCUSS OWNERS GROUP'S GENERIC RISK-INFORMED

PROCESS FOR EVALUATIONS

Steve Bloom	NRC ¹
Kristy Bucholtz	NRC
Angie Buford	NRC
Kevin Coyne	NRC
Jennifer Dixon-Herrity	NRC
Leslie Fields	NRC
John Hughey	NRC
Meena Khanna	NRC
Michelle Kichline	NRC
Chris Kreuzberger	NRC
Chang Li	NRC
Siva Lingam	NRC
Gurcharan Matharu	NRC
Philip McKenna	NRC
Caty Nolan	NRC
William Orders	NRC
Ben Parks	NRC
Charles Peabody	NRC
Bo Pham	NRC
David Rahn	NRC
Richard Stattel	NRC
Gregory Suber	NRC
Keith Tetter	NRC
Antonios Zoulis	NRC
Jim Andrachek	PWROG ²
Jana Bergman	PWROG
James Boatright	PWROG (WEC ³ /Luminant)
Rob Burg	PWROG
Steve Catron	PWROG
Connor Medlen	PWROG
Matthew Cox	PWROG (APS ⁴)

¹ U.S. Nuclear Regulatory Commission (NRC)

² Pressurized Water Reactor Owners Group (PWROG)

³ Westinghouse Electric Company LLC (WEC)

⁴ Arizona Public Service Company (APS)

David Alford	PWROG
David Koenigsfeld	PWROG
Michael DiLorenzo	PWROG (APS)
Bradley Dolan	PWROG (TVA ⁵)
Nathan Hall	PWROG (STP ⁶)
Melinda Higby	PWROG (WEC)
Chad Holderbaum	PWROG
Andrew Howe	PWROG (WEC)
Reed Labarge	PWROG (WEC)
Andrea Maioli	PWROG (WEC)
Jennifer Meneely	PWROG
Damian Mirizio	PWROG
Brian Mount	PWROG
Sara Scott	PWROG
Svetlana Lawrence	PWROG
Brett Titus	NEI ⁷
Phil Couture	Entergy ⁸
Ron Gaston	Entergy
Avil Julka	NextEra

Note: Couple of people from the Industry also attended (not able to capture the names by phone numbers in the Microsoft Teams).

⁵ Tennessee Valley Authority (TVA)

⁶ South Texas Project, (STP)

⁷ Nuclear Energy Institute, (NEI)

⁸ Entergy Operations, Inc. (Entergy)

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ADAMS Accession Nos.:**Package: ML22136A252****Meeting Notice: ML22097A248****Meeting Slides: ML22110A024****Meeting Summary: ML22136A255*****by email**

OFFICE	NRR/DORL/LPL4/PM*	NRR/DORL/LPL4/LA*	NRR/DEX/EICB*
NAME	SLingam	PBlechman	MWaters
DATE	4/27/2022	5/17/2022	5/19/2022
OFFICE	NRR/DNRL/NCSEG/BC*	NRR/DRA/APOB/BC*	NRR/DSS/SCP/BC*
NAME	SBloom	AZoulis	BWittick (HWagage for)
DATE	5/19/2022	5/16/2022	5/16/2022
OFFICE	NRR/DSS/SNSB/BC*	NRR/DSS/SFNB/BC*	NRR/DORL/LLPB/BC*
NAME	SKrepel	RLukes	RChang
DATE	5/19/2022	5/19/2022	5/17/2022
OFFICE	NRR/DORL/LPL4/BC*	NRR/DORL/LPL4/PM*	
NAME	JDixon-Herrity (WOrders for)	SLingam	
DATE	5/27/2022	5/27/2022	

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