

Update on NEI 99-02, Revision 8

ROP Public Meeting

July 13, 2023



Purpose

- Provide update on status of NEI 99-02 draft revision 8 and engagement strategy for NRC review and discussion

Overview

- Since revision 7 was issued in 2013
 - 50 FAQs have been approved*
 - 2 FAQs pending
 - ◆ 22-01, Replace the ANS PI with ERFER PI
 - Pending Commission Approval of SECY-23-0010
 - ◆ 23-02, PB Scram (in NRC review)
 - 1 White Paper, AP1000 (in NRC review)

* The current list of approved FAQs can be found on the [NRC website](#).

Draft Changes

■ Summary of Changes

- Replaced references to Consolidated Data Entry (CDE) with Industry Reporting and Information System (IRIS) throughout
- Incorporated definition of “concurrent failure” (FAQ 14-04)
- Added definition of “initial transient” (FAQ 18-01)
- Major re-write of MSPI section including App. F&G (FAQ’s 13-06, 14-01, 14-02, 14-08, 15-03, 16-01, 16-02, 16-03, 16-04, 17-03, 17-04, 17-05, 20-03)
- Major rewrite of EP section (FAQ’s 13-07, 19-01, 20-04, 21-02, 15-04, 20-02, 14-05, 21-03)
 - ◆ *Includes placeholder for FAQ 22-01 in advance of Commission direction on SECY-23-0010*
- Added new plant specific FAQs (14-03, 17-01, 17-02, 18-03, 18-04, 20-01)
- Updated criteria to account for AP1000 design difference (FAQ 21-01 & *pending white paper*)
- Updated BWR question for verifying rod position (FAQ 15-01)

Draft Changes

■ Additional Changes

- Address frequently asked questions and other areas that may warrant additional clarity
 - ◆ MFW availability
 - ◆ Use of CBPs & AFW
 - ◆ Describing planned scrams versus unplanned scrams to support post maintenance activities such as expected actions taken to address main turbine rubs and initial vibrations during plant startup
 - ◆ Add clarity for reactor shutdowns less than 35% versus reactor scrams (FAQ 18-05)
 - ◆ Add clarity to unplanned power change exclusion when addressing other issues during a planned power reduction greater than 20% (FAQ 13-02, 13-05)
 - ◆ Add clarity around what is considered as part of the unplanned power reduction versus normal follow up actions to meet reactivity plans, ASI/Xenon control, and other normal reactor operations following power changes

Next Steps

- Finish addressing remaining open items, pending FAQs/AP1000 White Paper, etc
- Incorporate feedback from internal industry reviews
 - Additional clarity added to MSPI section & appendices
- Submit to NRC prior to Sept 20th ROP public meeting (ECD Aug 15th)
- Discuss and incorporate NRC feedback as appropriate during ROP public meetings (*additional ROP public meetings may be warranted*)
- Implement NEI 99-02 rev. 8

Questions

