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

April 17, 2024

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

FROM: Lundy Pressley, Reliability and Risk Analyst ***/RA/***
PRA Oversight Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MARCH 21, 2024, PROBABILISTIC RISK ASSESSMENT CONFIGURATION CONTROL SIGNIFICANCE DETERMINATION PROCESS PUBLIC MEETING WITH THE NUCLEAR ENERGY INSTITUTE AND OTHER INDUSTRY STAKEHOLDERS

On March 21, 2024, the U.S. Nuclear Regulatory Commission (NRC) staff held an observation public meeting with the Nuclear Energy Institute (NEI) and Industry, to continue the discussions between the NRC staff, industry stakeholders, and the public regarding enhancing the NRC's oversight of the licensee's implementation of its Probabilistic Risk Assessment (PRA) Configuration Control (PCC) process. Specifically, the staff discussed Significance Determination Process (SDP) proposals related to PCC issues. NRC staff and Industry shared proposed SDP examples on SDP, with most of the discussion focused on minor and more-than-minor criteria. This meeting offered an opportunity for the industry and public to gain familiarity and to provide feedback on the staff's PCC SDP proposal.

The presentation materials for the public meeting are available in Agencywide Document Access and Management System (ADAMS) under the following Package Accession Number.: (ML24074A275) with the following specific documents: NRC Presentation (ML24074A267); NRC Draft PCC SDP Examples (ML24074A270), Utility PCC Examples (ML24074A272). The public meeting announcement is available in ADAMS (ML24065A372) and the associated Public Meeting Notification System No.: 20240328. A list of attendees is included in Enclosure 1. The details of the meeting and discussion points are contained in Enclosure 2.

As of the date of this summary, the Public Meeting Feedback System has not received any feedback.

No regulatory decisions or commitments were made at the meeting.

Please direct any inquiries to Mr. Lundy Pressley at 404-997-4621 or by email at Lundy.Pressley@nrc.gov.

Enclosures:
1. List of Attendees
2. Meeting Details

SUBJECT: SUMMARY OF MARCH 21, 2024, PROBABILISTIC RISK ASSESSMENT CONFIGURATION CONTROL SIGNIFICANCE DETERMINATION PROCESS PUBLIC MEETING WITH THE NUCLEAR ENERGY INSTITUTE AND OTHER INDUSTRY STAKEHOLDERS. DATED: April 17, 2024

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DGasperson, OPA RI
DScrenci, OPA RII
VDricks, OPA RIV
SBurnell, OPA
LPressley, NRR
RFelts, NRR
PMcKenna, NRR
MKhanna, NRR
MFranovich, NRR
MKing, NRR

ADAMS Accession No. ML24109A046 ***by e-mail**

OFFICE	NRR/DRA/APOB/RA*	NRR/DRA/APOB/BC *
NAME	LPressly	AZoulis
DATE	4/17/24	4/17/24

OFFICIAL RECORD COPY

LIST OF ATTENDEES

MARCH 21, 2024, PRA CONFIGURATION CONTROL SDP PUBLIC MEETING
WITH NEI AND OTHER INDUSTRY STAKEHOLDERS

Lundy Pressley	NRC
Andy Rosebrook	NRC
Antonios Zoulis	NRC
Rick Deese	NRC
David Werkheiser	NRC
Qin Pan	NRC
John Hanna	NRC
Pat Finney	NRC
Matthew Humberstone	NRC
Meena Khanna	NRC
Philip McKenna	NRC
Reinaldo Rodriguez	NRC
Rick Deese	NRC
Shane Sandal	NRC
Sukjoon Kim	Argonne National Labs (ANL)
Matthew Degonish	AMEREN
Justin Hiller	AMEREN
Isaac Mulhern	AMEREN
Michael Cymbor	Arizona Public Service (APS)
Michelle Carr	APS
Gary Chung	APS
Everett Depue	APS
Mark Hulet	APS
Michael Wittas	APS
Enrique Meléndez	Consejo de Seguridad Nuclear (Spain)
Jeff Stone	CONSTELLATION
Patricia Pringle	CONSTELLATION
Rachelle Johnson	CONSTELLATION
Roy Linthicum	CONSTELLATION
Suzanne Loyd	CONSTELLATION
Philip Tarpinian	CONSTELLATION
Hero Xavier	CONSTELLATION
Deann Raleigh	CURTIS WRIGHT
Robin Ritzman	CURTIS WRIGHT
Mary Miller	DOMINION ENERGY
Brian Mount	DOMINION ENERGY
Clem Littleton	DUKE-ENERGY
Heather Szews	DUKE-ENERGY
Jennifer Varnedoe	DUKE-ENERGY
Robert Rishel	DUKE-ENERGY
Clem Littleton	ENERCON
Rob Drsek	ENERGY HARBOR
Douglas Rapp	VISTRA
James Laborde	ENTERGY

Byron Croker	ENTERGY
Rob Burg	EPM
Steve Meyer	EPM
Bruce Morgen	EPM
Mark Schairer	EPM
Travis Weber	EPM
Casey Weiser	EPM
Fernando Ferrante	Electric Power Research Institute (EPRI)
John Richards	EPRI
David Alford	EVERGY
Lu Huang	EVERGY
Jeff Suter	EVERGY
Paul Nguyen	EVERGY
David Vu	EVERGY
Steve Catron	FPL
Luke Karten	FPL
Jadie Palenzuela	FPL
Keith Vincent	FPL
Brad Tyers	GENERAL ELECTRIC
Andy Ratchford	JENSENHUGHES
Victoria Anderson	Nuclear Energy Institute (NEI)
Thomas Basso	NEI
Tim Riti	NEI
Gary DeMoss	Public Service Energy Group (PSEG)
Harry Balian	PSEG
Cheryl Ann Gayheart	SOUTHERN
Vish Patel	SOUTHERN
Kristin Kaspar	STPEGS
Russell Jones	STPEGS
Bradley Dolan	Tennessee Valley Authority (TVA)
Gerry Kindred	TVA
Mark Nicholson	TVA
Eric Browne	TVA
Damian Mirizio	WESTINGHOUSE
Adam Stein	XCEL ENERGY
Greg Kvamme	XCEL ENERGY
Brian Slack	XCEL ENERGY
Jason Strickland	XCEL ENERGY
Phil Couture	Unaffiliated
Robin Ritzman	Unaffiliated

MEETING DETAILS

MARCH 21, 2024, PROBABILISTIC RISK ASSESSMENT CONFIGURATION CONTROL SIGNIFICANCE DETERMINATION PROCESS PUBLIC MEETING WITH THE NUCLEAR ENERGY INSTITUTE AND OTHER INDUSTRY STAKEHOLDERS

Purpose

To continue the discussion between the NRC staff, industry stakeholders and the public regarding enhancing the NRC's oversight of the licensee's implementation of its Probabilistic Risk Assessment Configuration Control (PCC) process. Specifically, the staff will discuss proposals related to the Significance Determination Process (SDP) with respect to PCC issues. This meeting will offer an opportunity for the industry and public to provide feedback on the effort and on the staff's recommendation to enhance the oversight efforts associated with PCC.

Background

The objective is to develop a balanced approach for PCC oversight, closing an existing oversight gap in the reactor oversight process (ROP); and to develop the necessary guidance training and qualifications to support inspections in this area.

The current near-term oversight recommendation for PCC includes the use of an operating experience smart sample (OpESS) to be used as an additional tool by inspectors as part of ROP baseline inspection preparation. The information and trends identified from OpESS inspections will provide insight into the long-term oversight recommendations. The OpESS was issued and is publicly available (ADAMS Accession No.ML23255A006).

Meeting Details

Mr. Lundy Pressley of the NRC opened the workshop with a presentation (ML24074A267) which included information on PCC background and the SDP proposal. NRC staff then fielded questions related to the SDP proposal.

The meeting then transitioned to a discussion on SDP examples beginning with a discussion on the utilities' PCC Examples (ML24074A272), followed by discussing the NRC's PCC SDP Examples (ML24074A270).

- NRC staff stated that the focus of the OpESS and any associated SDPs would be on significant safety issues with respect to PRA configuration control and not PRA acceptability.
- NRC staff reiterated that the area of PRA configuration control is currently an inspectable and enforceable area at present and that the OpESS and associated proposed SDP is to provide additional guidance in this area.
- Industry shared interest in what guidance will be provided to the cross regional review panels. NRC staff stated that consideration will be given to releasing a draft of the guidance for review. A draft copy of that guidance has subsequently been released and is available under ADAMS No. (ML24103A179).
- Industry asked the following specific term or definition related questions:
  a) Definition of reasonable doubt.
  b) Definition of significant.
  c) Meaning of adversely change any risk informed decision in an unfavorable manner.
  d) Definition of what constitutes operating experience (OpE).

NRC staff answered the above questions as best as possible in relation to PCC issues and relayed that there are currently no defined definitions on these terms within the NRC's Reactor Oversight Process (ROP) framework. NRC staff do not intend to create definitions or deviate from current regulatory practice and will continue to follow current guidelines. Therefore, specific definitions on these items cannot be provided.

Other industry questions:

- Industry asked for clarification on what might constitute no violation at all instead of just minor more than minor. NRC staff communicated the current requirements for what constitutes a performance deficiency, minor violation, and violation, which is contained within IMC 0612 (ML23067A031).
- Industry asked if NRC staff plan to make changes to IMC 0609, Appendix K, and NRC staff answered that currently some PCC changes are in progress, however, additional changes may be identified following information gathering from completion of the OpESS.
- Industry asked about licensee's identifying PCC issues and NRC replied that it is preferable for licensees to identify those issues, which could be considered licensee identified violations (LIV) and that NRC would follow current LIV process regarding PCC issues.
- Industry asked a question on exposure and NRC staff stated that the exposure would follow current practice of 1-year or if the issue was related to a recent model change performed within the last year, then the exposure time would be whichever was shorter. In addition, exposure time would be in accordance with current practice of SDP year.
- Industry asked about being required to use new methods. NRC staff stated that industry would not be required to use new methods and would only be required to meet the licensing requirements and commitments. NRC staff compared this approach to a backfit.
- Industry asked if licensees are required to review all procedure and plant changes. NRC staff replied that it is not expected that licensees review all changes, however, licensees should follow their processes and procedures and generally be aware of what changes will have a significant impact on the PRA model and have controls in place to monitor those changes.
- Industry asked if issues or findings will only be related to actual risk assessments. NRC staff replied that all situations are different, however, the comparison was made to current engineering inspections where there are no actual consequences and loss of margin could result in findings. In addition, NRC staff stated that for PCC issues current processes would be followed.

Additional items of discussion:

- NRC and industry discussed the NRC's SDP example 1, related to data updates performed within the period of every 2 refueling outages. Industry debated this performance deficiency (PD) and how this would be applicable in practice. There was a debate on the requirements and what this process is in practice and how this example could be confused and misinterpreted. NRC staff agreed to take feedback and continue to review this example.
- NRC staff agreed to capturing examples from the cross regional panels, specifically those related to what is considered reasonable doubt.
- NRC staff committed to continue to communicate on the utilization of the PCC OpESS and have further open dialogue on the topic. Specifically, NRC staff committed to another public meeting related to PCC SDP, which was schedule for April 18, 2024.