

NEI 99-02, Rev. 8

ROP Public Meeting

Sept 25, 2024



Purpose

- Provide update on NEI 99-02 rev. 8

Overview

Since revision 7 was issued in 2013

- Over 50 FAQs have been dispositioned*
- 1 White Paper approved, AP1000 (included in rev. 8)
- SECY-23-0010 approved to replace the ANS PI with ERFER PI (FAQ 22-01)

More recently

- 2 NRC public workshops conducted
- 23 NRC staff review comments dispositioned (ML24074A472)

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

Summary of Changes

- Replaced references to Consolidated Data Entry (CDE) with Industry Reporting and Information System (IRIS) throughout
- Incorporated definition of “concurrent failure”
- Additional clarity added to the Unplanned Scram with Complications Section
 - Added definition of “initial transient”
 - Updated criteria to account for AP1000 design differences
 - Updated BWR question for verifying rod position
 - Clarified use of SRVs for pressure control following the initial transient
 - Clarified conditions for meeting MFW availability

Summary of Changes

- Add clarity to unplanned power changes when addressing unrelated issues during planned power reductions
- Added new plant specific FAQs
- Major reformatting of MSPI section including App. F & G
- Major reformatting/rewrite of EP section including retirement of ANS PI and addition of new ERFER PI*

* ERFER PI pilot reporting began 1Q2024.

Summary of Changes

- Removed proposed examples of unplanned scrams and exceptions described in IE white paper
 - To be discussed later

Next Steps



- Complete updates & submit NEI 99-02 rev. 8 to NRC for final review
- Implement NEI 99-02 rev. 8 (ECD fall 2024)

Questions



Initiating Events White Paper

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Path Forward



- White paper submitted to NRC to provide recommended clarifications to NEI 99-02, unplanned scrams per 7000 critical hours PI. (ML24185A209)
- Discussed at NEI 99-02 public meeting on Aug 28th for consideration in rev. 8.
- Clarify when manual scrams are used as part of a normal reactor shutdown sequence.
 - After removing the main generator from the electrical grid to shutdown the reactor versus reaching manual or automatic scram criteria because of a transient/required action.
 - As part of main turbine post maintenance testing following major maintenance to address expected rums/vibrations versus as a response to equipment failures.
- Examples pulled from NEI 99-02 draft rev. 8 based on NRC questions/comments discussed at the public meeting.

Path Forward

- Subject of a future public meeting/workshops (late 4th quarter or early 1st quarter 2025) to discuss white paper and other examples after rev. 8 is issued.
- Potential outcomes provided alignment is reached.
 - Additional clarification and descriptions for unplanned scrams under the IE cornerstone section
 - New appendix similar to App. H, USwC Basis Document, that provides more details and supporting information/examples.
 - Improved guidance when exceptions should be pursued/considered based on certain criteria and situations that may be encountered.

Questions

