

September 12, 2016

MEMORANDUM TO: Stacey L. Rosenberg, Chief
Probabilistic Risk Assessment Licensing Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Leslie C. Fields, Senior Project Manager */RA/*
Probabilistic Risk Assessment Licensing Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF AUGUST 18, 2016, PUBLIC MEETING BETWEEN
THE NUCLEAR REGULATORY COMMISSION AND THE NUCLEAR
ENERGY INSTITUTE TO DISCUSS INDUSTRY PROPOSED
TEMPLATE FOR 10 CFR 50.69 LICENSE AMENDMENT REQUESTS

On August 18, 2016, the U.S. Nuclear Regulatory Commission (NRC) staff held a Category 2 public meeting with the Nuclear Energy Institute (NEI) to discuss an industry proposed template for License Amendment Requests (LARs) that will be submitted under Title 10 of the Code of Federal Regulations (10 CFR) 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors." Prior to the meeting the industry provided a proposed draft LAR template available at Agency-wide Documents Access and Management System (ADAMS) Accession Number ML16251A490. The 10 CFR 50.69 LARs apply the categorization process described in NEI 00-04, Revision 0, "10 CFR 50.69 SSC Categorization Guideline," dated July 2005, as endorsed by Regulatory Guide (RG) 1.201, Revision 1, "Guidelines for Categorizing Structures, Systems, And Components in Nuclear Power Plants according To Their Safety Significance, For Trial Use", dated May 2006.

After meeting introductions, the Nuclear Energy Institute introduced the industry proposed template by giving a presentation entitled "Streamlining 50.69 Licensing" (ADAMS Accession Number ML16250A665). NRC provided feedback comments on the proposed template with a presentation entitled "NRC APLA Staff Comments on Industry Proposed 10 CFR 50.69 Template for License Amendment Request Applications" (ADAMS Accession Number ML16250A620). The public meeting notice was made available in ADAMS at Accession Number ML16229A294. During the meeting the following topics related to the 10 CFR 50.69 LARs were discussed.

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Using Fire PRAs in the 50.69 Categorization Process

Industry asked the NRC whether plants that have developed a fire PRA are required to use it in the 10 CFR 50.69 categorization process. Industry stated that they don't believe that 10 CFR 50.69 regulation requires the use of fire PRA in the 50.69 categorization process, and as an alternative may decide to use the Individual Plant Examination of External Events (IPEEE) Fire Induced Vulnerability Evaluation instead. It was mentioned that both options are allowed per the guidance in RG 1.201. NRC staff referenced the NRC's forward fit provision, which is outlined in a letter issued to NEI in 2010 (ADAMS Accession Number ML101960180). NRC informed the industry that they will research this topic and provide feedback at a later date.

Schedule of Risk-Informed Submittals

Industry discussed the status of planned risk-informed (RI) submittals, including: (1) 10 CFR 50.69 regulation, (2) Technical Specifications Task Force (TSTF), TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF also known as Initiative 5b;" and TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times – RITSTF" also known as Initiative 4b. NRC asked industry to provide more details on the number and schedule of planned submittals in order to allow the NRC to appropriately plan resources for upcoming reviews. Industry stated that they will gather that information and provide it to the NRC at a later date. NRC explained that there are resource limitations on number of risk-informed applications that can be reviewed at one time. More discussions are anticipated to determine the best path forward on this topic.

Industry Plan for Streamlining RI Submittals

There was extensive discussion on the industry's proposal to streamline the regulatory review of applications being submitted in parallel RI licensing applications. The industry asked the NRC if it would be possible to perform a single review of PRA quality for multiple RI applications submitted concurrently with respect to the same plant (unit) and asked for details on how to submit the LARs to expedite the review. The NRC stated that there are several limitations with this approach, in terms of resources, especially if the submittals are submitted few months apart. NRC highlighted that all information necessary for the submittal (for example Facts and Observations (F&Os)) should be included in that submittal, even if it is duplicate between different submittals. NRC clarified how a review of PRA quality for an application usually takes into account previous reviews performed for other applications for the same plant, if applicable. NRC stated that they will discuss the streamlining process internally and communicate the path forward at a later date.

PRA Technical Adequacy

NRC provided clarification on the information expected to be submitted in the RI submittals to demonstrate PRA Technical Adequacy. The NRC stated that all the F&Os from the PRA peer reviews that have not been closed by an NRC approved process will have to be submitted in each RI application. NRC clarified how staff review of the F&Os would incorporate results from review of previous RI submittals, if the same PRA models were used in these previous submittals, and how the review varies based on the type of application.

Deviations from Guidance

NRC indicated that the 50.69 LARs should clearly identify how the proposed categorization process is different from the approved guidance. Industry stated that no deviations are expected, however agreed that this type of information should be included upfront in the LAR. NRC pointed out that the categorization process approved for the pilot Vogtle application is slightly different than the process described in NEI 00-04 guidance and asked the industry to clarify whether it will follow the process approved for Vogtle or the guidance in NEI 00-04. Industry stated that no decision was made on this topic. It was pointed out that Vogtle was the only plant that has applied the risk-informed categorization process and have categorized few systems. Industry also stated that it will consider whether to revise the NEI 00-04 guidance to include the lessons learned from the pilot.

Passive Categorization Process

NRC staff clarified that the LARs should justify why the proposed categorization process for passive components is acceptable, not just identifying the previous NRC approvals as precedents.

Plant Specific Items to be Addressed

Additionally, there were discussions on what plant specific aspects should be provided in the LAR, such as sensitivity studies, unreliability factor, and the summary of plant procedures for categorization.

Closing Remarks and Public Comments

At the conclusion of the meeting it was decided that further discussion will be planned after NRC receives the schedule of planned 10 CFR 50.69 submittals.

An opportunity for public comment was provided near the end of the meeting. There was one public comment asking for clarification on the meaning of the acronym F&Os. NRC explained that F&Os are the acronym for Facts and Observations and that these are outcomes of the PRA peer reviews. No further actions will be taken to address this comment.

An agenda and list of meeting attendees is enclosed within this memorandum.

Enclosures:

1. Agenda
2. List of Attendees

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ADAMS Package Accession No.: ML16250A548

ADAMS Memo Accession No.: ML16250A558

ADAMS Enclosure 3 Accession No.: ML16250A620

ADAMS Enclosure 4 Accession No.: ML16250A665

ADAMS Enclosure 5 Accession No.: ML16251A490

OFFICE	NRR/DRA/APLA	NRR/DRA/APLA	NRR/DRA/APLA: BC
NAME	LFields	MBiro	SRosenberg
DATE	09/07/16	09/08/16	09/12/16

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**PUBLIC MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND
INDUSTRY TO DISCUSS PROPOSED TEMPLATE FOR 50.69 LICENSE AMENDMENT
REQUESTS AGENDA**

**August 18, 2016
1:30 p.m. – 4:00 p.m.
OWFN-03-B04**

PURPOSE: To discuss a proposed 10 CFR 50.69 template for upcoming license amendment requests

Introduction and meeting objective

Industry Presentation of 10 CFR 50.69 proposed template

NRC comments

Public comment period

Adjournment

ENCLOSURE 1

PUBLIC MEETING BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND
INDUSTRY TO DISCUSS PROPOSED TEMPLATE FOR 50.69 LICENSE AMENDMENT
REQUESTS

NRC

S. Rosenberg
S. Dinsmore
M. Biro
L. Fields
M. Markley
E. Brown
D. O'Neal

Stakeholders

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M. Schiltz, NEI
P. O'Regan, EPRI
K. Melson, Excel Services
T. Hicks, Southern Co.
D. Hoffman, Excel Services
R. Linthicum, PWROG
G. Kindred, TVA
K. Nicely, Exelon
P. Lashley, FENOC
T. Hess, TVA

Stakeholders

Participation via webinar

V. Anderson, NEI
D. Gilmore
R. Rishel, Duke Energy
B. Mann, Excel Services
J. Redd
V. Anderson
M. O'Keefe
D. Mirizio, Westinghouse
M. Lewis
G. Miller, Dominion
T. Hook
P. Opsal, AREVA
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N. Larson, Luminant
S. McCoy, EPM
S. Catron, FPL
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J. Hiller, Ameren