

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

June 18, 2019

MEMORANDUM TO:	Ami R. Agrawal, Chief Reactor Inspection Branch Division of Inspection and Regional Support Office of Nuclear Reactor Regulation
FROM:	Tekia V. Govan, Project Manager <i>/RA/</i> ROP Support and Generic Communication Branch Division of Inspection and Regional Support Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING HELD ON MAY 22, 2019

On May 22, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff hosted a public meeting with the Nuclear Energy Institute's (NEI's) Reactor Oversight Process (ROP) Task Force executives, and other senior industry executives, to discuss the staff's progress on the ROP enhancement initiative and other ROP topics.

Updates to Changes to the Engineering Inspection Program

The NRC staff provided a brief update on the proposed changes to the engineering inspection program (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19141A219). The update included the plan for implementation of the new procedures, when to expect publicly available drafts of the procedures, and when the NRC inspectors will be trained on the changes. The NRC staff also provided a review of how the focused engineering inspection (FEI) topics were selected. The staff answered questions from industry on how operating experience was used in determining FEI topics, and how the NRC would incorporate lessons learned from the current environmental qualification inspections. The NRC staff committed to making the training presentation provided to NRC staff inspectors, available to the public.

The NRC staff is currently drafting new inspection procedures and will make the completed procedures publicly available in June 2019. The staff is considering additional FEI topics, should the Commission approve the proposed engineering inspection program cycle. The staff will provide the Commission with the additional topics through a Commission's Assistant Note.

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Operating Experience – Brunswick Cryofit Coupling Failure

The NRC staff discussed recent operating experience involving the failure of a one-inch diameter cryogenic coupling at Brunswick Nuclear Generating Station (Brunswick; licensee), Unit 1 (ADAMS Accession No. ML19141A219). On March 28, 2019, Brunswick, Unit 1, was operating at 100 percent power and declared a notice of unusual event (NOUE) for a leak rate greater than 10 gallons per minute for 15 minutes. Operators received indications of narrow range reactor water level instrument failing high. The licensee cooled the reactor down to Mode 4 and terminated the NOUE when the leak rate fell below 10 gallons per minute.

The licensee identified that the leak was a result of the failure of a one-inch CryoFit coupling, which is a cryogenic coupling. The coupling was located on reactor vessel level reference leg and had been installed as part of a post-Three Mile Island plant modification made in 1989. The coupling had experienced a 360-degree circumferential failure in what appeared to be the center of the coupling where the two connected pipe ends meet.

The NRC staff performed a search of relevant operating experience for these couplings. In 1991, Seabrook Station (Seabrook) experienced the 360-degree circumferential fracture at the midpoint of a CryoFit coupling on a pressurizer gas space sampling line. A second CryoFit coupling in the same line fractured in a similar manner after an accidental physical impact. In response to the Seabrook event, the NRC issued Information Notice 91-87, "Hydrogen Embrittlement of Raychem CryoFit Couplings." There have been no known failures of CryoFit couplings since.

The NRC staff continues to seek additional information from industry and NEI on extent of condition (e.g., how many other plants have similar couplings) and failure mechanism (e.g., possible material aging component related to coupling failure).

<u>Reactor Oversight Process Performance Indicator Program Frequently Asked Question</u> (FAQ)

FAQ 19-02, Brunswick reactor coolant system leakage was presented by NEI (ADAMS Accession No. ML19141A149). The NRC will review the submitted FAQ 19-02 and discuss the topic during the next ROP public meeting on June 19, 2019.

FAQ 19-01, "Change to NEI 99-02 Text for the Drill/Exercise Performance Indicator – Initial Notification Form Accuracy Criteria" (ADAMS Accession No. ML19119A304) was transitioned from tentatively approved to final approval by the NRC staff.

NEI's Response Letter to the March 27, 2019 ROP Public Meeting

On May 20, 2019, NEI submitted a letter to the NRC, "Proposed SECY on ROP Enhancement" (ADAMS Accession No. ML19141A143). This letter was submitted by NEI to provide a written summary of key comments that the nuclear industry would like considered in the June 2019 ROP enhancement SECY paper that will be submitted to the NRC Commission. The NRC staff acknowledge receipt of this letter and will continue to develop the SECY paper for submittal to the Commission by June 2019.

Next Steps – ROP Enhancement

The NRC staff provided an overview of longer term ROP enhancement activities (ADAMS Accession No. ML19141A219), as follows:

- Perform holistic review of problem identification and resolution inspections
- Examine effectiveness of the cross-cutting issues program
- Evaluate significance determination process decision-making to improve efficiency and effectiveness
- Evaluate changes to supplemental inspection for White findings (Inspection Procedure 95001)
- Optimize independent spent fuel storage installation and radiation protection inspections
- Evaluate crediting licensee performance in other safety cornerstones for emergency preparedness inspection findings

Conclusion

At the end of the meeting, NRC and industry management gave closing remarks. NEI expressed appreciation for the open dialogue and willingness of NRC staff to hear industry views, even in areas where NRC staff and industry may not be aligned. The NRC management stressed the importance of NRC being focused on providing reasonable assurance of public health and safety when considering changes to the ROP.

The enclosure provides the attendance list for this meeting.

Enclosure: As stated

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DATE	06/13/2019	06/18/2019	06/18/2019

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LIST OF ATTENDEES

REACTOR OVERSIGHT PROCESS MONTHLY PUBLIC MEETING

May 22, 2019, 10:00 AM to 12:15 PM

NRC One White Flint North 11555 Rockville Pike O-11B04 Rockville, MD

Name	Organization	Name	Organization
Carlos Sisco	Winston and Strawn	Chris Miller	NRC
Mark DeWire	Duke Energy	Billy Dickson	NRC
Jim Slider	NEI	Greg Bowman	NRC
Bryan Wooten	Duke Energy	Jason Carneal	NRC
Larry Parker	STARS Alliance	Alex Garmoe	NRC
Jerry Oierce	Duke Energy	Russ Gibbs	NRC
Laura Schwartz	International Technology and Trade Associates	Doug Bollock	NRC
David Gudger	Exelon	Ami Agrawal	NRC
Jean Fleming	PSEG Nuclear	C.J. Fong	NRC
Steve Catron	NextEra	Joylynn Quinones	NRC
Ken Heffner	Certrec	Mike Montecalvo	NRC
Tony Zimmerman	Duke Energy	Don Helton	NRC
Robin Ritzman	FENOC	Julio Lara	NRC
Rob Burg	EPM, Inc.	Dan Merzke	NRC
		Mohammed Shaubi	NRC
		David Garmon	NRC
		Annie Mayer	NRC
		Anthony Masters	NRC
		Robert Orlikowski	NRC
		Robert Kahler	NRC
		Derek Widmayer	NRC