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TRANSCRIPT OF PROCEEDINGS

Public Meeting

APPEARANCES

Session Chair:

Michael Johnson
Deputy Executive Director
Reactor and Preparedness Programs, OEDO/NRC

Panelists:

Bill Dean
Regional Administrator, RI/NRC

Victor McCree
Regional Administrator, RII/NRC

Chuck Casto
Regional Administrator, RIII/NRC

Elmo Collins
Regional Administrator, RIV/NRC

Bryan Hanson
Senior Vice President, Midwest Operations, Exelon Generation

Mano Nazar
Executive Vice President and Chief Nuclear Officer, NextEra
Energy

1 PROCEEDINGS

2 MICHAEL JOHNSON: Good afternoon, everyone. If you'll take
3 your seats, we'll begin. I want to welcome you to the Regional Administrators'
4 session this afternoon of the Regulatory Information Conference. It's truly an
5 opportunity for me to moderate this particular session. I greatly prefer it to the
6 previous session, where in this session, at least, I get to ask the questions, as
7 opposed to try to answer them. In all -- in all sincerity, I considered it really an
8 honor to participate in this panel along with the NRC's regional administrators, as
9 well as two very capable industry leaders, and I look forward to the discussion.

10 Before I begin the introductions and we begin the panel, I do want
11 to just remind you, as a courtesy to the presenters or to our panelists, please
12 silence your electronic devices. If you need to take a break during the session,
13 please find a way to do that in a way that minimizes the impact, the disruption, if
14 you will.

15 Questions in this session are welcome. We will start in the format
16 of this session with questions to get the panelists talking and to get you warmed
17 up. I think this panel will work best -- based on previous experience, this panel
18 works best when you engage, when you ask follow-up questions, or when you
19 ask questions that are -- that are informed based on the answers that you've
20 heard given by the panelists. So please -- there are cards being passed around
21 available to you. Please do write your questions on those cards. They'll be
22 brought forward, and we'll ask those -- we'll ask those questions and have the
23 panelists address them.

1 Well, on our panel today, we are joined with Bill Dean, who is a
2 regional administrator from Region I; Vic McCree, who is a regional administrator
3 from Region 2; Chuck Casto, who is a regional administrator from Region III;
4 Elmo Collins, who is a regional administrator from Region 4; Bryan Hanson,
5 who's a senior vice president, Midwest Operations for the Exxon -- Exelon
6 Generation Company; and Mano Nazar, who is the executive vice president and
7 chief nuclear officer for NextEra Energy. So again, our panelists, very
8 distinguished panelists. Please welcome our panelists.

9 [applause]

10 Okay, so let's get into it. For our first question, and I'm -- and I'm
11 going to address these questions to a couple of our panelists. Then I'll provide
12 opportunity for other folks to weigh in if they will. The first question really deals
13 with the Reactor Oversight Process, and we've been implementing the Reactor
14 Oversight Process for a little bit over a decade, so we've got some experience
15 with the Reactor Oversight Process. I'm going to ask Elmo and Bryan to start off
16 and discuss current ROP implementation in terms of successes and challenges.

17 ELMO COLLINS: Well, thank you, Mike. Perhaps before we got --
18 we got going, I should have advised you of my three responses, you know, that I
19 have to choose from. They are "I agree," "I don't know," and "I'll do what my
20 lawyer says." So [laughs] thank you.

21 [laughter]

22 I guess it's not funny the third time around.

23 [laughter]

24 Anyway, with the -- with the reactor oversight, we've been in this
25 program 10-plus years, and I think on balance, it's almost without question, it's

1 been a very successful oversight program. A couple of the -- of the strengths
2 that I see of the oversight program are -- and the successes -- are how it's
3 enabled NRC to focus resources with respect to when we think there are
4 performance issues, you know, with the action matrix; objective thresholds for
5 action; and, really, prescribed levels of resource changes that are dictated by the
6 performance levels from the performance assessment. So that allows us to put
7 the resources where they belong, and we believe that input for performance
8 assessment is largely a risk informed, and so that's also, we believe, of value,
9 and it allows us to put things in perspective.

10 For -- from a communication perspective, I think it's been very
11 successful in terms of NRC communication with the licensee. Just -- when we --
12 when we use the terminology of the Reactor Oversight Process, I think you know
13 what we mean, and I think you know what we're going to do with it and what it's
14 going to mean for you in terms of our action, and in theory, you know almost
15 ahead of time before we reach our conclusion. So based on the same set of
16 facts and circumstances, if we're having reliable output, you should be able to
17 determine where we're headed with our actions.

18 And I think maybe the biggest strength -- success has been the
19 assessments we do on the oversight process itself. We do annual assessments,
20 we get input from external stakeholders, we meet every year at the Agency
21 Action Review Meeting, we get the results of those assessments, and we
22 challenge ourselves to see what we can do with the program.

23 A couple of challenges -- I mean, we can -- we can come up with a
24 long list. It is risk informed, a lot of the action -- the process. Our probabilistic
25 risk tools are largely active-component-driven, I would say, and so I think we've

1 asked ourselves from time to time if we think we're getting the right measure.
2 For passive components, I think we're not the only ones that have engaged with
3 this challenge. I think the industry has been challenged with passive
4 components and their preventive maintenance programs also, so that's
5 something that's on our mind. I think the action matrix procedures, you know,
6 95.001, the supplemental procedures, 002 and of course, the Column 4, we rely
7 heavily on the plans and -- of the licensee when we close out successfully 95.001
8 or 95.002. What that means is we're also relying heavily on the corrective action
9 program and the licensees' implementation of those plans. But we've asked
10 ourselves, at least in Region 4, if we liked the efficacy of the plans. Because
11 normally we do not get to necessarily inspect the implementation of the action,
12 and it's really difficult for us to judge the efficacy of the action, and that's very
13 crucial if you're -- if it's a 95.002. A degraded cornerstone is a relatively big deal,
14 and for that to not happen again, even if it's two or three years later, I think would
15 be a big deal. So that's a challenge we have. And of course we have two efforts
16 underway, if you're aware of them, to look at the oversight program. One of them
17 we undertook after the last AARM, Agency Action Review Meeting, and a piece
18 of that is going to be to step back and take a more holistic look at the baseline
19 inspection program, and I think that'll be a very important effort for us. And of
20 course, more recently, the Commission asked us to do an independent
21 assessment of the Reactor Oversight Process, so we're continuing to look for
22 ways to make it better.

23 BRYAN HANSON: Yeah, I'll try one. I'll try, too, to say that, you
24 know, the ROP process is like a box of chocolates. You know, you pick one --
25 but that didn't go over so well, either. That was Forrester Gump, by the way.

1 [laughter]

2 No, I'd say there's a couple of -- you know, there's successes and
3 there's challenges as well with the ROP. And Brad's laughing at me down there.
4 That's my counsel. You know, the Safety Culture Common Language Initiative, I
5 think, is a great success where the collaboration by the NRC info industry
6 represents a -- represented as members of the public is a good representative of
7 the success of the ROP process, and I think there's others as well.

8 I'd say a couple of the challenges that certainly we would highlight
9 is that, you know, the regions differ significantly in the number of findings
10 assigned cross-cutting aspects to. And I think that's a real challenge for the
11 regional administrators to try to drive consistency and remove some of the
12 subjectivity around cross-cutting aspects. But the single most challenging part, I
13 think, right now for us is where, you know, an inspector will raise an issue at a
14 single site and then raise it at each of the subsequent sites that he or she may go
15 and do an inspection to. And most of these issues, or at least in my opinion,
16 most of these issues appear to be based on new interpretations of requirements
17 or the plant's licensing basis rather than operating experience or new facts. And
18 when issues like this arise, you know, I hope they would be handled more
19 generically, the NRC would work to handle it more generically.

20 And I was encouraged to see Steve West named as the chairman
21 of the CRGR. I think it's important that the NRC follow their guidance and review
22 things through the CRGR process. I hope the NRC invests some time educating
23 the CRGR members on their role, but more importantly, I hope they provide
24 some training or education around historical programs that were in place years
25 ago, and in many cases already directly addressed the issues that are now being

1 raised again today. For example, the systematic evaluation program, or IPEEE
2 program, so -- You know, I think there's a many -- a lot of positives to the ROP
3 process, but a couple of things that, you know, I think are challenges for us right
4 now.

5 MICHAEL JOHNSON: Okay, thanks, Bryan. Thanks, Elmo. I -- let
6 me just ask any of the other panelists if you want to weigh in on that question.

7 MANO NAZAR: Mike, another are that, I think, from industry point
8 of view is the POA modeling and being able to, you know, have a model that is
9 more consistent between the NRC and industry. I think that we're spending
10 significant energy quite often to really, kind of, imagine and compare the input
11 into the POA model. So that's one area in addition to what Bryan talked about.
12 And then sometimes we find that SEP process is sometimes very subjective.
13 And those are some of the areas that as we continue looking at enhancements, I
14 think you should keep them on top of the list.

15 MICHAEL JOHNSON: Okay. We -- I'm going to talk about
16 communications now for a minute. We heard at previous panels discussion of --
17 regarding the importance of communications, and the importance of
18 communications not just between us and licensees, the NRC and licensees, but
19 also NRC and other stakeholders. Of course, communications, as we know,
20 requires constant attention. So the question is, what can the NRC and the
21 industry do to assure that communications remain constructive? And I'm going
22 to ask all of the panel members to address this question. Vic, would you like to
23 start?

24 VICTOR MCCREE: Good afternoon, everyone. Can you hear me?
25 It's an interesting question [unintelligible], and I agree with Mike that having good

1 communications are important. It reminds me, one of my favorites movies is
2 "Cool Hand Luke," and there's a scene in the movie where Luke has escaped, I
3 think for the second time, and the warden, Strother Martin, stands over him and
4 says, in only a way that I and Danny Bozz [spelled phonetically] -- is Danny
5 here? -- can say very well, he says, "What we have here is a failure to
6 communicate." So -- and that was supposed to be a nice segue.

7 [laughter]

8 I think you know when you have good communications, and you
9 know when you -- when you don't. I would subscribe to three principles
10 associated with good communication. One is do it early and regularly. And what
11 do I mean by that? I believe when a new chief nuclear officer or new site vice
12 president or new management team comes on board, whether it's at the
13 licensee's organization or within the region, that you establish those
14 communications, those interfaces early, and develop a routine in which that's
15 nourished. And the same is true for our senior resident inspectors and others,
16 that they develop those lines of communication.

17 The second is that the communications be open, that they be
18 candid and clear and also healthy. And when you're able to do that well, I
19 believe it supports the third principle, and that is -- in fact, I think [unintelligible]
20 alluded to it yesterday -- that when we do disagree, that we can disagree without
21 being disagreeable. We can establish the base for good, healthy, open
22 communication. So those are my thoughts on that.

23 MICHAEL JOHNSON: Okay.

24 BRYAN HANSON: Yeah, I would -- I would agree as well. I think
25 good communications are important. They're important to our regular interfaces.

1 Describe, prescribe your interfaces, whether it's the resident inspectors, the
2 project managers, the project management -- project managers, the deputy
3 directors, branch chiefs or even the regional administrators, like, you know, a
4 formal communication plan that you regularly exercise those communications
5 when you may just be updating them on plant performance or current initiatives
6 within your business. It's important to do, so that when the time comes and you
7 need to call someone at 2:00 a.m. or you need their help or you need to
8 communicate an issue, that it's not the first time that you've communicated with
9 your counterpart.

10 I think it's also important because it helps ensure that the agreed to -
11 - the agreed-to priorities by senior management at levels -- you know, at the
12 senior management levels are adhered to, and we don't get distracted with some
13 of the peripheral details that can bog down communications or bring in other
14 issues that are less important to the -- you know, the situation at hand. So I think
15 it's important. We at the Exelon have a formal protocol document where we
16 regularly exercise these communications, and I think they pay dividends for us.

17 MANO NAZAR: Mike, we got involved with some of the TIA areas,
18 and just as we expanding that process, especially with respect to Fukushima
19 response, I think that quite often, we find ourselves at that [spelled phonetically].
20 After the NRC staff finished developing TIA, then industry gets involved. A
21 consideration would be very nice that during the development of the TIA, that the
22 industry gets involved, and I think that that is going to create better clarity over
23 the issues, and then perhaps as far as the responses, a reaction to the -- to
24 some of those issues that we can do them in more timely manner.

25 So that's one area, and also as Victor mentioned about

1 communication between management, that's really important. But when it comes
2 to the process aspect of it, and especially in the law of license amendment, you
3 know, that communication is very important between the staff and the industry,
4 and especially for the project managers to play a bigger role in coordination of
5 that effort to prevent, perhaps, some of the unnecessary energy that that requires
6 to go through the ROIA's and things of that nature. So with respect to
7 communication, you know, when it goes down to really detail, I think that that's
8 the area that the energy, unnecessarily energy, can be prevented.

9 MICHAEL JOHNSON: Okay. Go?

10 VICTOR MCCREE: Yeah, I'm going to -- Mike, I'm going to use a
11 technique you used this morning and answer a different question than what you
12 asked.

13 MICHAEL JOHNSON: [laughs] Nice.

14 VICTOR MCCREE: It does revolve around communications, but
15 you know, in Region I, we have probably a little bit more unique environment in
16 terms of communications because of the stakeholder environment that we face, a
17 lot of well-educated, informed, and knowledgeable members of the public that
18 certainly hold us accountable on a daily basis of assuring safety in plants in
19 Region 1, and very interested and active state and local officials. And so in
20 Region I, we really look at pretty much anything that we do as something that we
21 need to make sure we develop appropriate communication plans and key
22 messages for, even for routine inspection reports at many of our sites. I know
23 Elmo probably lives through that with California. He probably would like
24 California to join Region I so, you know, he can communicate more with, you
25 know, Wolf Creeks and others.

1 But -- so that really challenges us, and, you know, there's been
2 some changes over the last several years in terms of how rapidly information that
3 comes out of the NRC finds its way into the public listserv process and social
4 media and so on. So things move a lot faster. You know, if we send something
5 out, we'd better be prepared to talk about it then and not think about, well, in
6 another day or so we're going to have to respond to queries. You know, we'll
7 send out an inspection report or some other document, and sometimes within
8 minutes, we'll get a call from a local newspaper. So the rapidity with which
9 information gets out there and gets in the hands of interested stakeholders, really
10 is important for us.

11 And the other thing I think I would want to mention is how important
12 it is to make sure that we do communicate with all of our stakeholders about
13 issues and about things. I get, actually, a lot of emails from several of our
14 stakeholders, public stakeholders, in Region I and really make an effort to try and
15 respond to those individuals or get the information they're seeking to members of
16 the staff, and they can respond to them, because they're as important as
17 licensees and the states and federals -- other federal agencies in terms of the
18 overall communications. And so those are some perspectives that -- from
19 Region I that I think that we really strive to adhere to.

20 MICHAEL JOHNSON: Okay. Thank you, [unintelligible].

21 CHUCK CASTO: I, for one, Mike, think you're doing a wonderful
22 job facilitating this panel.

23 MICHAEL JOHNSON: [laughs]

24 CHUCK CASTO: The -- and I want to thank Julio Lara, particularly,
25 for Region 3. Region 3, carrying a load again. The --

1 [laughter]

2 -- for collecting the questions and putting the answers together.

3 Because I'm just the pretty face of the organization, so there's always somebody
4 behind.

5 Okay. What I would say is you have to have a communication
6 strategy. Even more than a plan, you have to have a strategy. And I think some
7 of the things that we're trying to do in Region 3 is not only have a communication
8 strategy, but in some cases, where it's appropriate, have an education strategy to
9 help members of the public understand these deep technical issues better, and
10 then they can ask more informed questions the more educated they are. So it's
11 really a -- two vectors of communications and education that you have to -- have
12 to have, and I think you have to bring the public along. If you -- if you -- if there
13 are surprises, if let's say you're at Column 2, and then suddenly you make
14 Column 3 or Column 4, and your public doesn't even know that you're in Column
15 2, then they wake up some bright and sunny morning and find out their nuclear
16 plant is one of -- what -- which I think is a miscommunication -- is one of the
17 worst performers in Column 4, then it --then you haven't brought them along, so
18 then you lose trust. Having that communication strategy and education strategy
19 helps build trust and confidence with the public. And amazingly enough, I think if
20 you build strong enough trust and confidence, they'll forgive some level of
21 performance decline.

22 We typically, in our public meetings, I think -- and particularly
23 Americans, when we -- when we have public interest groups or public groups, we
24 typically -- we listen to them, then we kind of make an assessment, and then we
25 tell them what the right answer is. So our strategy is, listen, assess, and tell.

1 And really, what you need to do is, you know, listen, learn about what their
2 concerns are, help them with those concerns, and then you can lead somewhere
3 else. So you can't -- you really can't shortcut that process. So I'll leave it at that,
4 Mike.

5 MICHAEL JOHNSON: Thank you, Chuck. Elmo?

6 ELMO COLLINS: Thanks, Mike. Having given this some thought
7 after some several large meetings in California, just some things that come to me
8 for NRC to think about in what we do in these public interactions. Similar to -- I
9 think it's very consistent with what Chuck just said. First is we can help manage
10 the expectations through process. You know, the meeting is a process. So
11 make sure that process is laid out, it's understood, set the expectations for the
12 meeting. I think that's very important for us in California, because some people
13 that come to the meetings think they're going to have input into a decision, where
14 we're actually conducting an informational meeting, and so that
15 misunderstanding or different expectation causes tension. And so we can
16 manage the expectations through our process; be clear and be disciplined as we
17 -- as we exercise that process.

18 I think we can think harder about methods and formats and forums
19 to do what Chuck just said. We have a hard time getting a dialogue established.
20 I've -- Category 3 pieces of the question-and-answer pieces of our meetings
21 have been called, I've been told by some people, as a "theater of defense." And
22 that's -- and so we're technical people, we think that way, and we tend to be
23 defensive. We start answering questions or telling them what the answer, but
24 that's not a dialogue. I think we can think harder and work harder. We've done
25 some things to establish dialogue, but we could do a lot more.

1 And then the last thing I would suggest for NRC is whatever the
2 occasion, I think it's come out in some of the answers we've had here this
3 morning, we can be a reliable, responsive source of information. You know, what
4 people want to know, we can provide it, we can provide it quickly, and it can be
5 accurate. And so we can do that, and I think that would go a long way.

6 MICHAEL JOHNSON: Okay, thank you very much. Great
7 responses to the question.

8 This next question comes from the audience, and it relates to
9 consistency among the regions. So I'm going to address it initially to the regional
10 administrators, but I ask Bryan and Mano to weigh in if you -- if you desire. So
11 the question is, consistency among the -- among the regions regarding findings,
12 assignment of cross-cutting aspects, and significance appears to continue to be
13 a challenge. What additional initiatives are being taken to clear -- to close the
14 gaps?

15 CHUCK CASTO: Can I go -- can I go first?

16 MICHAEL JOHNSON: Absolutely.

17 CHUCK CASTO: Because I don't think we've ever issued a finding
18 that's been inconsistent myself.

19 [laughter]

20 The -- and Bryan talked about earlier about consistency of cross-
21 cutting issues. Cross-cutting issues are probably the toughest thing to --
22 because there's a lot of human performance involved and decision-making, so
23 that area is very difficult to be, quote-unquote, "consistent on." Several years
24 ago, we embarked on an initiative on a -- what we called a "reliability initiative" in
25 the ROP, to look at the regions and see, you know, and we did -- it was an

1 extensive effort to look at reliability of findings, and I -- and I think we were
2 satisfied. I don't know that you all will be happy with this answer, but we were
3 satisfied with our reliability. Actually, our value is reliability, not consistency. The
4 -- because issues are not identical -- they may be close, but they're not always
5 the same situation from one site or one region to another. The issue is, in our
6 value system, is reliability. If I take the same set of circumstances in Region 3
7 and I apply those to Region 2, will the same outcome happen? So is it -- is it a
8 reliable outcome? Yes, we can -- we care about consistency, and we looked at
9 that very hard. I think there will always be some -- to be honest with you, I think
10 there will always be some unique differences at those levels, but certainly when
11 you get to greater than green issues, they're clearly -- because those become
12 agency issues with a lot of other offices involved, I doubt that you'd see much
13 inconsistency in greater than green issues. It's particularly in cross-cutting
14 issues and the green issues where you see -- and minor, where you're going to
15 see the most problems. But -- and we strive every day. We had your reliability
16 initiative, and we reinvigorate that each time that this issue comes up, you know.
17 But I don't think you'll ever completely stamp out inconsistency.

18 BILL DEAN: Yeah, if I -- if I could just offer -- Mike, I'm sorry.
19 [unintelligible]. You know, I've been with the agency 28 years, and this has been
20 a question for 28 years. And to be honest with you -- and I appreciate Chuck
21 saying reliability really is the issue and not consistency. You know, when we
22 developed the Reactor Oversight Process back in the late 1990s, we made a
23 concerted effort relative to threshold definition and made a concerted decision
24 that in the past, NRC findings -- we put sort of at a higher hat on the NRC finding,
25 and we had follow-up inspections. And even if the finding was of low

1 significance, it took on this artificial import because it was what the NRC was
2 interested in, but it may not have been the most -- highest-priority item that was
3 on the licensee's plate out of their own corrective-action program. And so we
4 consciously made the decision that, you know, green findings, the minor, more
5 than minor threshold, we recognize there would be some lack of consistency
6 there, but it wasn't that important, relative to what the NRC's response was going
7 to be. Those issues were going to be embedded in the licensees' corrective-
8 action programs, prioritized and dealt with consistent with what their significance
9 was, and we were okay with that. And as Chuck indicated, the issues of greater
10 significance, certainly those where we're going to take some additional agency
11 action, certainly require more effort on our part to show we're dealing with those
12 consistencies I think that we have. Anytime that we have a finding of greater
13 than green significance, there's the headquarter panels and regional participation
14 and the Office of Enforcement, so we have a consistent and collective view on
15 those issues of significance. So I don't lose sleep over, you know, these
16 comments or questions about, you know, there's more findings in this area in one
17 region than another. I'm really concerned about when we have findings of
18 significance that then require application of our agency resources.

19 VICTOR MCCREE: Thanks, Bill, for that. That was one of the
20 points -- is this on? -- that I was going to reiterate is that for findings of greater
21 than green significance, that we do have that interplay -- interdependent
22 decision-making with our colleagues here at headquarters as well as the other
23 regions. Chuck alluded to the reliability initiatives, which actually continue.
24 Those activities continue their sponsorship by each region in the different areas,
25 and the reliability of the findings that we identify and the assignment of cross-

1 cutting aspects is actually one of those areas that has been and continues to be
2 assessed on an ongoing basis.

3 The other thing I'd mention briefly is that the Commission did direct
4 us in a -- in an SRM staff requirements memo issued in October to perform an
5 independent review of the Reactor Oversight Process, and Brian McDermott is
6 leading that ongoing effort. I'm sure this is one of the areas that Brian's group
7 may look at. There's also an integrated assessment ongoing of the Reactor
8 Oversight Process. We're taking advantage of this biennial review to do a
9 deeper dive to confirm that we're inspecting the right areas with the right
10 frequency with the right resources, and perhaps even look at some additional
11 flexibilities we can and should include in the process. Again, those are areas
12 where we continue to work.

13 MICHAEL JOHNSON: Okay. Mano, please?

14 MANO NAZAR: Oh. I really think that we came a long way in this.
15 ROP has helped us to make significant improvement. I think the fear that I have
16 is as we're getting into post-Fukushima implementation of some of those
17 ingenuities and we're getting beyond design basis and the interpretational news
18 kind of things, that inconsistency actually is going to be more consequential. So
19 even though we have made progress, I think that this is worthy of spending some
20 time, and I'm glad to hear of regional administrators, that they are focused in
21 creating that consistency, because I personally feel that as we're getting into the
22 inspection, there are traps, and not having the consistency, and if you let some of
23 the teams get invented to inspection process, and you know, that carries from
24 one side to another. As you know, our fleet -- we have sites at three different
25 regions so, you know, we actually can see the similar kind of, you know, activities

1 or relationships [spelled phonetically] at three different sites with perhaps three
2 different ways of, you know, handling it. Like I said, again, I want to give credit to
3 all of the regional administrators for coming a long way and again, our ROP has
4 been a backbone for this improvement. But I think that this area definitely is
5 worthy of spending more time as we're getting into future in response to
6 Fukushima activities.

7 MALE SPEAKER: Thank you, Mano. Anyone else?

8 BRYAN HANSON: I would just add one comment. I don't think
9 many of us worry about the minor -- more than minor inconsistencies across the
10 region. It's like Mano alluded to, I think most of the utility folks would say it's
11 those issues that rise to setting precedent at one site that then carries through, or
12 could carry through, the other regions where the other opportunities haven't been
13 vetted out and the issue has been handled generically, and those are the ones
14 that cause us trouble.

15 MICHAEL JOHNSON: Okay. Yes, Chuck?

16 CHUCK CASTO: I will say in response to Bryan -- you know, I --
17 you need to raise those issues to us as soon as you see them. Sometimes they
18 don't -- I was at a site recently where I found out that we were doing exactly what
19 Bryan said. We'd -- we were on like our third site of finding the same issue and,
20 you know, it was only -- I just happened to be doing a site visit. I went in and
21 talked to the CDBI team and they said, "We have this issue, and, oh, by the way,
22 we found it at X, Y, and Z plant." So if you -- I mean, they don't -- it doesn't
23 always get flushed up to me when that's happening, particularly at a -- in an
24 inspection effort, you know, that it -- you know, that the staff is running at the staff
25 level. So those -- if you hear of those or if you see those kind of issues, you

1 need to raise it to senior management in the region and let us know that we're
2 doing that, you know, sort of -- there used to be a name for it, but -- compliance
3 by inspection, I think was what we used back in the day -- what we called it. And
4 -- so if you see -- help us help you, right. If you see it, raise it up. See
5 something, say something, ain't that [unintelligible]?

6 MALE SPEAKER: With regulation during inspection charts [spelled
7 phonetically].

8 CHUCK CASTO: Yeah, that's it.

9 VICTOR MCCREE: Yeah. And I wouldn't want to leave you --

10 MALE SPEAKER: I haven't taken it [spelled phonetically], so --

11 VICTOR MCCREE: Yeah, I wouldn't want anyone left with the
12 impression that unless those kinds of issues are raised to Chuck, then we're not
13 understanding them and dealing with them. There is a normal process. There's
14 a governance process, if you would, that ought to work all the time but clearly it
15 doesn't work all the time, where issues that are identified at one plant would be
16 vetted in the region, be shared with our counterparts in the program office as well
17 as with the other regions, and we can decide how to treat that issue going
18 forward, whether or not to look at an inspection, perhaps treat it via some generic
19 communication or otherwise. But that process exists. It is helpful; we've used it
20 in the appropriate way, but as Chuck indicated, if and/or when you do see that
21 not happening, it's appropriate to alert -- alert Chuck.

22 MANO NAZAR: Let me correct [spelled phonetically] --

23 MALE SPEAKER: [laughs]

24 MANO NAZAR: -- I can tell you that we use -- we use the process
25 that Chuck indicated. Just for the audience here that that definitely, you know,

1 when appropriate, that process that Chuck just talked about , it works. The user -
2 - one of the users, and I can't tell you that it was very positively done and I think
3 that the end result was, you know, what the outcome supported, our core values
4 and principles for both organizations. So that process, as you mentioned, that
5 that -- again, we thank you for your leadership in Region III and it's been working.
6 Thank you.

7 VICTOR MCCREE: One other thing real quick. Mano, you
8 reminded me -- you mentioned some interest or concern in making sure that
9 whenever new requirements come out of our ongoing Fukushima work that the
10 ROP reflect whatever those changes are. And in fact, there's a Tier 3 item that
11 specifically requires us to examine what, if any, changes to the Reactor
12 Oversight Process would be needed as we advance the Fukushima decision
13 making, including whatever action comes out of the Near-Term Task Force
14 Recommendation One [spelled phonetically] issue. So please be at ease.

15 MICHAEL JOHNSON: Okay, thank you Vic. Let's stay with the
16 topic of Fukushima for a minute or two if we can. This question is -- I'm going to
17 direct it, Vic, to you and also to Mano, but of course other folks can weigh in.
18 The Fukushima Near-Term Task Force Report provided a number of
19 recommendations, some of which have already been promulgated in orders and
20 letters demanding information. What steps are being taken by the industry and
21 the NRC to ensure that engineers and inspectors have shared -- have a shared
22 understanding about lessons learned and actions being taken as a result of the
23 accident at Fukushima?

24 VICTOR MCCREE: Thanks, Michael. I think the first thing that's
25 important to note and I believe it's one of the things that makes NRC as effective

1 as we are as a regulator is that we are learning organization and we're learning a
2 lot as we disposition the Fukushima items. And part of that learning is being
3 made because a number of the people that we have involved in this activity, the
4 Fukushima Task Force, and it includes people from the NRR, Office of Nuclear
5 Reactor Regulation; Nuclear Security Incident Response Office of Research;
6 other organizations, Office of Nuclear Material Safety and Safeguards -- they're
7 very engaged in helping us to figure out what the proposed actions and decisions
8 should be for the Commission. So there's a lot of learning that's inherent and
9 that's a good thing. There's also been reference to the Fukushima Steering
10 Committee which Mike leads, and, at present, I participate in, as well as Bill
11 Dean; Elmo did previously. So there's a learning opportunity that comes from
12 that that cascades down to our organizations within the regions.

13 We're aware of the fact that we've already implemented or are
14 implementing three temporary instructions, TI-183, 187, and 188, the last two
15 being the walk downs associated with the flooding and seismic issues, the
16 demands for information. And the staff -- our people were in the regions, were
17 involved in the development as well as the implementation of those TIs, so
18 there's a lot of learning that comes out of that. And finally, we hold inspector
19 counterpart meetings at least twice annually and we invite experts, if you would,
20 on the Fukushima actions from headquarters office to come down and provide
21 training to our staff. And that's very, very valuable in making sure that we're up
22 to speed on not only what the requirements are, what the actions are, but why,
23 what's behind it. So, Mike, that's how we're keeping our folks engaged.

24 MICHAEL JOHNSON: Okay. Mano, from an industry perspective?

25 MARIO NAZAR: Sure. I think that Victor actually covered most of

1 the things that I was going to mention. I think that this one area that both
2 industry and NRC have really good alignment from the start and we came a long
3 way through the Steering Committee, as Victor mentioned, through working
4 groups, and through NEI interactions, and a coordination of a lot -- a lot of those
5 efforts. And I think that this is one area that we need to use as, perhaps, a good,
6 you know, flagship for how, you know, we can work through the issues, even
7 though there are some issues on the table that we have to address.

8 However, a few things that I think that we need to be cautious
9 about as we're moving forward that I think that I covered at the end of my earlier
10 remark, that how does NRC plan to, kind of, determine the significance of the
11 inspection findings and for Fukushima, especially beyond design basis. I
12 continue talking about that and we had a number of the areas that already kind of
13 cost some, perhaps, significant energy that goes into those areas. But what
14 steps that that region, to the earlier discussion -- that we're going to take to
15 ensure Fukushima inspections are being done in a really consistent manner that
16 we talked earlier. And again, this -- ensuring that that step is not, you know,
17 getting into the position, that we, as part of this inspection, as moving forward,
18 and interactions that the new things that coming up. And even though they may
19 have -- generic in nature, that they are used for a specific site and we've got to
20 kind of make sure that we are overseeing. I think Bryan touched on that as part
21 of his response to the first question. So those are some of the things that we
22 need to be cautious about as we're moving forward, but definitely interactions
23 and openness and through all of these steering committees, working group has
24 been very beneficial.

25 MICHAEL JOHNSON: Okay, thank you very much. This next

1 question deals with the subject of cumulative effects of regulation, of cumulative
2 impacts. There's been a lot of discussion today and through the [unintelligible]
3 with respect to cumulative effects on licensees, the tone of this question, though,
4 RAs [spelled phonetically], is focused on the effects -- the cumulative effects on
5 our inspection staff, the residents. And so the question I'm going to ask Bill to
6 answer, and then others can weigh in, is are residents overloaded with many of
7 the Fukushima follow-up items in inspection, so on and so forth?

8 BILL DEAN: I would say that -- I wouldn't say they're overloaded.
9 You know, obviously we budget for doing a number of what Vic referred to as TIs
10 during the course of the year, so there are hours allocated to our inspection
11 program to conduct various emerging inspections that aren't part of the baseline
12 inspection program. So from that perspective, it's not overly burdensome, but
13 sometimes the timing of these and if they all come at a same timeframe, like
14 several of the Fukushima ones have, it does make it a little bit more challenging
15 in terms of how do they balance their routine baseline inspection efforts -- oh by
16 the way, we're in an outage, so I've got outage-related stuff which is a very busy
17 time for certain sites, or we've got this event that occurred at a plant. So there's
18 a real juggling act on part of the residents, and it's going to vary site by site. I
19 would say that our branch chiefs in the regions do a wonderful job in terms of
20 staying in tune to the burden that their resident inspector staffs are under and
21 seek help if they need to. And there's been some sites where we've had to send
22 region-based inspectors to support the region -- the resident inspectors so they
23 could do, for example, these TIs and maintain the continuity of the site. So not
24 overly burdensome, but it is a challenge and something that we have to manage.

25 MICHAEL JOHNSON: Okay, all right. Good. Jack, you good with

1 that?

2 MALE SPEAKER: [inaudible]

3 MICHAEL JOHNSON: All right. Very good. Elmo?

4 CHUCK CASTO: Actually, I guess I can't help it --

5 MICHAEL JOHNSON: I knew you couldn't.

6 [laughter]

7 MALE SPEAKER: Not good with that, huh, Chuck?

8 CHUCK CASTO: I -- you know, I would say that -- you guys

9 check me on this. I would say it's probably not as extensive as it was after 9/11
10 in terms of TIs and the work effort, so I don't see it anywhere near the Fukushima
11 thing, anywhere -- particularly some of these TIs are specialist engineering work,
12 you know, not resident inspector work. So I really don't see it anywhere near the
13 level of, you know, post-9/11.

14 MICHAEL JOHNSON: Okay, thanks Chuck. I have a number of
15 questions that deal, again, with communications. I think, generated by the
16 responses in the discussion that we had on communications. I'll get to those in
17 just a second. I want to though ask Mano and Bryan to talk about cross-cutting
18 issues and the question is do you think substantive cross-cutting issues are
19 achieving what they were intended for in the ROP? So do you think that
20 substantive cross-cutting issues are achieving what they were intended for? I'll
21 ask you guys to start and then I'll ask the RAs to weigh in to the extent you
22 desire.

23 MANO NAZAR: I think that when we were talking about the ROP,
24 despite many, many, many, you know, advantages and benefits of the ROP,
25 cross-cutting is probably one area that is challenging. And I think that there are

1 many areas that cross-cutting, you know, helps us to perhaps deal with the
2 smoke, what I call at earlier stage before it becomes fire. And those definitely
3 benefitted the industry the most, but there are some areas that due to the fact
4 that subjectivities is -- you know, is a driver for those cross-cutting. And then,
5 because matter of some interpretation and then people wanting more over
6 [spelled phonetically] the interpretation. So I think that, again, there are some
7 challenges, but because of some of the positive aspects of the cross-cutting, if
8 we use those as kind of model, if you will, to continuing enhancing some of those
9 that are not as objective and clear in those areas, I think that that should help,
10 you know, what we're trying to achieve through cross-cutting process.

11 BRYAN HANSON: I don't think they drive us to do anything
12 different than we already aren't doing or working on. I think when we have cross-
13 cutting tags [spelled phonetically] tied to violations, we already recognize it
14 through our corrective action program and we may have something deficient in
15 our performance or decision making or PINR. I think -- so, you know, at the end
16 of the day I don't know that it drives a different behavior by the stations and the
17 licensees; I think we're already working on those activities. I think in terms of
18 trying to measure safety culture health at the plants I think the utilities or [spelled
19 phonetically] the licensee are far more advanced in our self-assessment
20 processes and our safety culture monitoring programs that I think are ahead of
21 the cross-cutting tags that would try to lead to -- to try to provide some insights
22 around [spelled phonetically] there.

23 MICHAEL JOHNSON: Okay. Vic? You look like you want to
24 answer.

25 VICTOR MCCREE: I think in the spectrum of never, rarely,

1 sometimes, mostly, and always, or somewhere in that scheme, I would agree
2 with you, Bryan.

3 BRYAN HANSON: Somewhere in there?

4 [laughter]

5 VICTOR MCCREE: Somewhere in there.

6 BRYAN HANSON: Partial credit.

7 [laughter]

8 VICTOR MCCREE: And I think the spectrum, at least within
9 Region 2 -- we have made thoughtful and appropriate use of substantive cross-
10 cutting issues and, in my opinion, have applied them when warranted. I think
11 relative to the use nationally, I think we may have exercised them less frequently
12 than other regions. Be that right or wrong, my sense is that over the application
13 period of the ROP, they've been mostly, mostly justified. Justified in the sense
14 that it did bring about additional attention and, in some rare cases, attention that
15 was not being given to an area that we had ascribed a substantive cross-cutting
16 issue. Having said all of that, I believe that the impact, which is what I focus on,
17 the impact, the outcome; in other words, does communicating that this is an area
18 of your performance that warrants improvement, does it influence an additional
19 focus and application of resources so that the outcome is better performance in
20 that area and, as a result of it, enhanced safety performance? And I believe that
21 it has.

22 MICHAEL JOHNSON: Okay, very good. I have a question from
23 the audience. What changes to the inspection manual and cross-cutting aspects
24 do you expect based upon safety culture common language initiative -- the safety
25 culture common language initiative -- so what changes to the manual cross-

1 cutting issues? Any of you RAs.

2 BILL DEAN: Let me take a shot at that first. I think Bryan talked
3 about the fact that he believes that industry is probably further ahead of us in
4 terms of the way that they monitor and manage safety culture at their sites, and I
5 think, on that spectrum that Vic talked about, I think I would probably be in pretty
6 strong agreement with Bryan on that regard. I don't think that we necessarily
7 provide -- or should we necessarily provide the tools to our inspectors and the
8 training that they would need to be savvy safety culture analysts. And so I think if
9 you were to look historically at where we find cross-cutting issues in the agency,
10 they tend to be in human performance and problem identification and resolution
11 and not so much in safety culture. My own personal perspective is that really the
12 agency -- we ought to certainly be conscious of and sensitive to what's going on
13 at the site in terms of how well do staff feel like they can raise issues at the site,
14 but I think that most times those are going to be self-revealing, either through --
15 either large numbers of allegations, you get complaints with DOL with
16 discrimination, and so on. Those are really the tells in my mind as to whether
17 you potentially have a safety culture issue at the site. I think our engagement as
18 we get into 95.003 inspections in plants that, you know, go beyond a greater
19 cornerstone column of the -- or the greater column [spelled phonetically] of the
20 action matrix where we do some notable inspection effort and we bring in safety
21 culture experts. I think that's meaningful and that's where we ought to be
22 engaging in safety culture. Personal perspective of this regional administrator.

23 MICHAEL JOHNSON: Okay. Elmo?

24 ELMO COLLINS: That was a great question, Michael. I'll have to
25 say I don't know the answer, but I think NRC's going to have to take a serious

1 look at this reconciliation. I think it's -- my -- I would offer to the audience it goes
2 -- it's beyond nomenclature and beyond labeling. I think INPO actually has a
3 distinctly different approach to try to understand this thing, safety culture, through
4 behaviors whereas NRC adopted the safety culture attributes through largely -- I
5 think we pulled them largely from the international community when we got them.
6 And so behavior and attributes, I think those are -- there's going to be some
7 challenges actually making those practically come together. We know they're
8 related, but they're not the same and it's actually more than just how we talk
9 about it and what it offers. And I'm personally optimistic and hopeful that when
10 we do make some changes that we can handle better what we'll call the human
11 performance aspects of a cross-cutting issue because there's so many
12 opportunities at a nuclear power plant, thousands of things go on a year, right,
13 that are -- you might ask yourself, is three or four, you know, occurrences the
14 right threshold of for such -- for such a call, and I think that's a challenge for us to
15 make sure we get that right. So...

16 CHUCK CASTO: I would say I sometimes agree with everyone on
17 this panel. The -- I'll be the heretic, I guess. The -- to some extent, I think that
18 the corrective action program and human performance cross-cutting issues
19 have sort of outlived their usefulness, and the safety culture one -- Bryan's taking
20 copious notes down here --

21 CHUCK CASTO: -- so I want -- really, I'm saying this for the
22 purposes of him to take notes and go back and think about that, but I think the
23 safety culture one we really have to take another look at. I hope we don't get
24 like-mindedness. I mean, the downside of having that common language is
25 having a common language, right? I mean, it's always good to look at things

1 from different perspectives. We've found that time and time again in this
2 industry. So I think we have to be cautious that we don't get too likeminded in --
3 with the -- you know, that's the downside we have to be aware of. So I'll just live
4 -- leave it at that.

5 MICHAEL JOHNSON: Okay. Okay? Good. Here's a question I
6 bet none of you thought would get -- you would get on this panel. It relates to
7 security. I want to start with the NRC folks, but, you know, Bryan, you guys are
8 welcome to weigh in.

9 MALE SPEAKER: [inaudible]

10 MICHAEL JOHNSON: Here's the question. Mark DePaul [spelled
11 phonetically], you nervous? Regional administrators are very familiar with sites
12 and site personnel. Is there any initiative for regional inspectors to be
13 responsible for force on force activities?

14 MALE SPEAKER: [laughs]

15 BILL DEAN: Yeah -- Vic's telling me to give the apostolic
16 Apostolakis answer, "I have to ask my lawyer" --

17 [laughter]

18 BILL DEAN: -- or is it "I don't know," or "I agree?"

19 MALE SPEAKER: That's Jim Wiggins.

20 BILL DEAN: This is a good question, and historically, inspection is
21 best done out in the regions. Having spent four years in [unintelligible] as the
22 deputy director, part of that with Jim Wiggins, you know, we have asked
23 ourselves this very question about should we have the force on force inspection
24 program be done out of the regions, and if so, when is the right time to do that?
25 It's a very complex and challenging inspection and, in my mind, perhaps we've

1 made it extremely challenging and complex and that's something I think we have
2 to look at in terms of -- you talk about cumulative effects of regulation. That
3 provides a substantial burden not only on the licensee but a substantial burden
4 on the NRC and, you know, now that we've been doing this for -- geez, I guess
5 we're on our third time around now for sites; is that right? You know, I think sites
6 are doing a pretty good job of protecting their facilities and so I think the time is
7 right to do a look at what our force on force inspection program should look like
8 and I think if we modify it appropriately, I think it would be an opportune time then
9 to look at putting it out in a region. And whether we do it in one region as a
10 center of excellence or have all the regions do it, there certainly is some benefit
11 of an inspection like that, having a cadre of individuals that are centralized
12 because you want to make sure that that inspection -- you know, we talked about
13 consistency before. This is one where we would want to make sure that we're
14 consistent and having it in four regions could create challenges in that regard if
15 there isn't really, really close and tight communication. So that's my answer.

16 MICHAEL JOHNSON: Mano, Bryan? Perspectives?

17 BRYAN HANSON: I think we have adequate protection at the sites
18 now. It's about demonstrating proficiency and consistency so I'm not sure where
19 that would fall out, but that's my view.

20 MICHAEL JOHNSON: Okay, very good. This question, again,
21 relates to communications. In the past, the NRC's emphasis on good
22 communications with licensees -- with a licensee, seems to have led to the public
23 perception that the NRC is a collaborator defending the continued operation of
24 the plant despite the safety issues, rather than being seen as a strong regulator.
25 Is that a concern to you?

1 CHUCK CASTO: What -- is it okay if I answer?

2 MICHAEL JOHNSON: Yeah, please.

3 CHUCK CASTO: I'll just take a shot at it. I -- you know, I really
4 like Bill Borchardt's comment about -- a couple of people have quoted it --
5 "Independence doesn't mean isolation." I think that's one of the most significant
6 ways that I've heard of putting it, but I -- the -- I think from the public -- one of the
7 problems we have -- this has just come to me recently, in my mind. One of the
8 problems we have with the public is that forever, we just were neutral. We're a
9 neutral party, we draw this baseline of safety, reasonable insurance of adequate
10 protection -- we draw this baseline of safety. So, you know, we always talk about
11 we're not pro-nuclear, we're not anti-nuclear, we're neutral, right? Well, that's a
12 real challenge with the public -- communications -- because actually I think to
13 some extent the public wants you to be for something, no matter who you are.
14 They want you to be for something, right, and Americans -- we, you know -- we
15 don't have a lot of registered independents in this country, right? So, you know,
16 we don't --

17 [laughter]

18 CHUCK CASTO: Oh, did I say that out loud? I'm sorry. I didn't
19 mean to say that, [laughs]. Oh, Bill -- Bill's a registered -- yeah. We can get that.
20 The -- so, you know, we like to take sides and I think the public wants us to be
21 pro-safety, right? They want us to be for something. They want us to be pro-
22 safety. So they want to see us charging out there making things safer and safer
23 and to be pro-safety. Well, you know, if this degree is safe, you know, a little bit
24 more is more safe, right? And so they don't get this concept of adequate
25 protection -- of adequate protection. And so that's very difficult for us in public

1 meetings to get out there when, you know, if -- why can't you make it even more
2 safe? That's just my perspective.

3 MICHAEL JOHNSON: Okay. Anyone else?

4 VICTOR MCCREE: Just a quick reference check. Bill isn't here, is
5 he? When Bill Borchardt made the comment about independence is not
6 isolation, he was actually quoting from the "Principles of Good Regulation," which
7 Commissioner Rogers wrote in 1991. But there's also another principle of the
8 five NRC principles of good regulation that it's -- I think it's relevant here, and
9 Chuck spoke to it. It's that this openness issue, what do we mean by -- I would
10 offer that we need to be open without being perceived as intimate, and that takes
11 a degree of being perceptive and discrete in how engage, certainly the regulated
12 community, but also engaging with our stakeholders. And so anyway, I just offer
13 that as well.

14 MICHAEL JOHNSON: Yes, Elmo, please.

15 ELMO COLLINS: Yeah, thanks, Michael. I'll just throw out a
16 couple of more thoughts here. I think we are challenged in public forums when
17 we -- when we appear with our licensees. We talk about things the same, we're
18 trained the same -- [laughs] -- and so we start to appear -- and we need to,
19 right? And that's a vital part of our doing business, but that looks like something
20 else to members of the public. So understanding that challenge for us as we're
21 moving forward -- I think we can, NRC, do a -- put a -- turn up the microscope on
22 the finer points of our communication as we move ahead. I think one way that
23 would strengthen us and maybe, and that's to communicate in those forums or
24 separately from our licensees, our independent verification activities. I don't think
25 we've talked about that enough in Region IV and in California, what that means --

1 what we are doing, what we're -- and the independent stuff we're doing,
2 independent counts [spelled phonetically], the checks, whatever that constitutes.
3 I think we could talk a lot about that, and yet somehow we know it goes straight
4 to our conclusion and so we lose that potential, I think, to communicate to
5 people. And then lastly, I think is to do a Venn diagram -- NRC should do a Venn
6 diagram with the public to identify those intersecting, overlapping values, and we
7 have a number of them, and then we can shape -- we can shape what we say
8 and how we say it. And I talked about forums and methods earlier, and think
9 about are we in the right forum, are we in the right methods to communicate and
10 have that dialogue and communicate to the public like we need to. So just some
11 thoughts.

12 BILL DEAN: And I just -- maybe Chuck, you can just take a, you
13 know -- as Elmo was talking it just reminded me when we use the word public,
14 but really you can subdivide the public. I think, Chuck, you've got a good --

15 CHUCK CASTO: Yeah, and I'll try to do this briefly. You know,
16 there's basically four publics out there. You have to -- you have to condition your
17 public strategy to address all four publics. You know, you can classify people
18 into four publics, you know, 99 percent of the people don't care. You know,
19 they're not engaged. You know, it's kind of group one and group two. Group two
20 people, you know, they're basically browsers, you know. If something affects
21 them then they'll get -- they'll maintain awareness. And then, kind of, group three
22 people are people that are engaged and active. And then group four people are
23 more activist kind of people. So, you've got those four groups of people and
24 when you're doing your communication strategy you need to think about how do I
25 best serve all four groups? What type of communication style does all four

1 groups need? What -- so, and address that communication style so that you can
2 help all four of them.

3 MICHAEL JOHNSON: Okay. Thank you very much. Okay. Good.
4 Very good job. So I have a series of questions that are really focused at -- for the
5 NRC folks -- deal with how we implement our programs, and so I actually was
6 just getting an assist as Chuck was talking on the TIA process. I was trying to
7 figure out -- trying to recall what that acronym stands for. I won't tell you what I
8 guessed, but it's the Task Interface Agreement process. It's a process by which
9 the Regions interact with NRR on specific technical issues to get a position. And
10 so the question is, why can't there be utility, industry, or public engagement
11 during TIA development? Wouldn't this lead to more transparency for the
12 process and allow for a more thorough TIA output? Please give us more than
13 "we'll look at it." So they're trying to foreclose the simple answer that you might
14 give.

15 CHUCK CASTO: I -- for me I think that -- we've talked about that
16 before. I think we should do that. I think TIAs should be -- we ultimately, I think,
17 put TIAs in the back of the inspection report or something when they're
18 dispositioned, and then you can comment on them and those things, but I agree
19 with that comment. I think that when we write a TIA -- first of all we should try to
20 avoid writing a TIA. That's the biggest thing is, try to get an answer without all
21 this formality and everything, you know, try to seek the answer right away. But I
22 have -- I very much encourage us to put out -- put out the TIA as its drafted and
23 get comments from everybody, because it's just more efficient and more
24 effective. Get comments from the public. Get comments from the affected utility,
25 and get -- so I don't know why we're not doing that. Maybe some -- one of the

1 lawyers could give me that answer.

2 BILL DEAN: Yeah, I guess I was -- I was going to offer -- I hadn't
3 given that much thought, but as Chuck was talking I think this might fit into the
4 comment we've heard from you a couple of times now, Bryan, is that sometimes
5 we see these TIAs and they end up sort of being discussions between regional
6 staff and headquarters staff and they go through maybe a certain level of review
7 in headquarters and a certain level of review in the Region, and the next thing
8 you know we're implementing it and we're making inspection findings, and then
9 that becomes an inspection finding that we then find multiple plants will do the
10 copycat inspection efforts. And so, you know, as Chuck was talking and seeing
11 how this could perhaps provide some, you know, inspection or regulation by TIA,
12 you know, if that's what the outcome is, then maybe it does deserve a little bit
13 more broader perspective.

14 CHUCK CASTO: I think the issue is kind of even bigger and that
15 goes to what Bryan said earlier. I don't think they're under the purview of CRGR.
16 Somebody could help me, Jim, or Wiggins or that, but typically CRGR doesn't
17 look at -- I don't think they look at TIAs, and for me that, you know, that should be
18 scoped in to the TIA process -- to the CRGR process. TIAs should be scoped in
19 there, because there's -- you know, I know the stack-up issue that's been, you
20 know -- that we've been dealing with, a stack-up issue. For me, that issue should
21 be in -- go through CRGR to look at that, and many of those other issues that I've
22 seen with the TIA process. And I know that's outside the scope of the CRGR, but
23 I don't know why it is. I think we ought to relook at that. It's a -- some of these
24 things that we're doing, like TIAs, they need to get scoped back in to CRGR and
25 get a thorough review.

1 VICTOR MCCREE: Just a couple of thoughts. I guess, principal is I
2 -- as I was listening to the discussion I was thinking of clarity, reliability,
3 independence, efficiency, and openness, even in this process that's -- that I think
4 is more transparent. The Task Interface Agreement process is more transparent
5 than it used to be, than it once was, and it could perhaps be more transparent. I
6 think fundamentally, though, when a Task Interface Agreement is written when a
7 Region, after inspecting an issue, finds that there's perhaps a lack of clarity on
8 the requirement or -- and/or there's some significant aspect of it that perhaps
9 warrants some collegial interface with the experts in the program office, and after
10 some preliminary discussions with that responsible office, they're ready to
11 receive it. They understand the issue to make the formal request and response
12 efficient, then we -- the Regions communicate them, share them formally with
13 that program office. And in parallel, we make that issue known formally to the
14 licensee; however, through the inspection process the licensee is already aware
15 of the issue, or should already be aware of the issue, and what the questions are.
16 So, while I understand the question and I would agree there's opportunity for
17 further clarity, perhaps maybe more formally making it available to the licensee,
18 perhaps even other stakeholders. I think whatever we do beyond the current
19 process inherently, we need to weigh those five principles, clarity, reliability,
20 independent, efficiency, and openness, and not -- and it's the efficiency issue that
21 I wonder if we're asking for more than we really want. Although I respect my
22 colleague here from Region III, I would not endorse CRGR weighing in on this.
23 It's not that level of issue, in my opinion, but it is an area that I think warrants
24 further consideration and I, too, saw Bryan writing notes, so we'll see if we can
25 sweep that one into your charter as well. Thanks.

1 CHUCK CASTO: Well, particularly I think when -- the stack-up
2 issue bothers me more than any, because that was a big impact. That was a big
3 impact on --

4 MANO NAZAR: That was -- the TIA, as industry noted that we had
5 to deal with that, and it required significant energy, because that lack of up-front
6 involvement put you in the situation that now you are into the tech spec
7 offerability issue and, at that point, the time is your enemy. You do not have
8 enough time to respond to those, and as a result, you end up, perhaps, doing
9 some work that is not supporting nuclear safety and it's taking away from other
10 areas. And I think that up-front leg work and any involvement in interaction is
11 going to prevent those unintended consequences.

12 CHUCK CASTO: And I just think, you know, we regulate by
13 regulation -- rules and regulations, and regulating by TIAs is I don't think a place
14 where we need to be, for me. I just don't -- that's not -- that's not the right
15 process to do regulation, I don't think. That's just my humble opinion, or maybe
16 not so humble.

17 MICHAEL JOHNSON: Okay. Anyone else? Good topic. Good
18 discussion. Next question, again, is one of those, I think, directed primarily to the
19 NRC, but interested in Mano, Bryan, your perspectives should you have them.
20 What tools or processes are in place to combat regulatory capture within the
21 inspector program -- within the inspection program? And I guess I would want
22 you to talk to the efficacy of those processes. Should I repeat the question?
23 What tools or processes are in place to combat regulatory capture within the
24 inspection program? So what tools are within the inspection program to prevent
25 regulatory capture?

1 ELMO COLLINS: Well, I'll start with some of the -- I guess to me
2 and maybe my colleagues, these are automatic, but we do annual objectivity
3 reviews. That's an assignment by our supervisors to -- we have criterion
4 established and every year we ask our supervisors to do an objectivity review
5 and draw a conclusion with respect to the objectivity of the inspector. I think day-
6 to -- day-to-day we're looking for evidences of not being objective, and so that's
7 almost an automatic. We have rotation policies with our resident inspectors,
8 regardless of whether there's any possibility of being captured or not. We have --
9 we emphasize very strongly in our guidance and our ethics rules not to socialize,
10 not to establish new personal relationships with the people that they're
11 inspecting, because we know that just the human dynamics of who we are that
12 could be detrimental to us and our credibility. And we do try to avoid even the
13 appearance of a conflict of interest, not just conflict. Of course, there's a number
14 of conflict rules, right? But then even the appearance of that could be captured
15 or in a conflict with our activity. So that's a few. We take this very seriously, I
16 think, in our independence and as we draw our conclusions. And we don't want
17 to be part of your processes. We'll always retain the ability, at the end, when
18 you're done, to step back and independently review and draw conclusions about
19 that. So there's a few.

20 MICHAEL JOHNSON: Okay. Good. All right. Very good. Vic, this
21 is for you. Region II once again has construction inspection responsibility. What
22 challenges does that present? And do you share construction operating
23 experience with the other regions?

24 VICTOR MCCREE: I would answer, I guess, the first part of the
25 question this way: I think having the construction program really provides more

1 opportunities for Region II than it does challenges. We started building our
2 capacity to inspect and oversee new construction in 2006, and have hired a
3 number of people in two divisions. We have about 60 folks that are implementing
4 our oversight process for construction, not only for the new reactors, but also for
5 Watts Bar Unit Two, as well as for the fuel cycle facilities and very, very capable
6 individuals across the various disciplines. And we actually take advantage of
7 what they know, the expertise that they bring in on the -- in our operating
8 inspection program. There've been a number of -- are a number of operating
9 facilities that are implementing significant engineering design modifications, so
10 we've taken advantage of those -- of the expertise for -- from our construction
11 staff, and at the operating fuel cycle facility as well. So I really find -- found it to
12 be, overall, a greater opportunity than I even would be willing to characterize as a
13 burden. And we've also shared the other -- the second part of the question was
14 the sharing of lessons learned and experiences with the other regions, and we've
15 done that, and we do that as well in multiple forums, including meetings that I
16 have with my counterparts up here, as well as in management meetings and staff
17 level meetings. So we have multiple opportunities to share lessons learned and
18 we definitely do that.

19 MICHAEL JOHNSON: Thank you, Vic. Chuck, this question is for
20 you from a member of the audience. In the past, the NRC has attempted to
21 educate through various methods, including for-the-record opinions, should the
22 regional administrators issue similar opinions/educational articles?

23 CHUCK CASTO: I -- first of all, Elmo has an iPad. I didn't know I
24 was allowed to use an iPad. So, I, you know --

25 [laughter]

1 He -- I hope you have an answer for this question. I'm not sure
2 what for-the-record -- what for-the-record articles mean, but you know, we are
3 doing a lot of blogging, whatever that is. You know, we're extensively, I think --
4 you know, we have designated bloggers in the blogosphere, and so probably the
5 last thing you'd want is for me to write something. But what are they talking
6 about?

7 VICTOR MCCREE: I think that the short answer is, yes, we have
8 used it and we do use it. Each region has a public affairs officer, at least one;
9 Region II has two. In fact, I'm looking at both of them right here. And we've
10 actually taken advantage of that for-the-record link on the NRC web page to post
11 responses, if you would, when there's information out in the media, or something
12 else that's available to the public that we believe is perhaps not fully informed or
13 may be totally -- that's not accurate and we'll take the opportunity to post a for-
14 the-record statement on the NRC web link to address that issue.

15 MICHAEL JOHNSON: Okay, Elmo.

16 ELMO COLLINS: Yeah, thanks. If I understand the question, I
17 think the answer is we do have the capability. I think where I see that I'm
18 challenged, at least in Region IV, is if I felt it was my goal to go out and correct
19 everything that was in error, I think that might be a very long list of things that are
20 said and that are accurate. It might not even be doable. So, I use a lot of
21 judgment, because I am limited in resources and focus, but I have gone out.
22 When I went a couple of weeks ago we wrote a letter to the editor from a
23 Colorado newspaper that I thought was just so off-base that we felt we needed to
24 respond. And so, yeah, I think we do it. We want to do it. We want the correct
25 information out there, especially when it's about NRC and what we're doing or

1 not doing. But it's a judgment call and it's very resource intensive, so...

2 BILL DEAN: I think we get good advice from our public affairs
3 officers in the regions about where we ought to expend effort to do something
4 like that and when not to. So I trust their judgment.

5 MICHAEL JOHNSON: Okay. Great. This next question really
6 focuses us back on the ROP and engineering inspections. The question is -- and
7 I'll ask all of the panelists to the extent you desire to address this, what does the
8 NRC and what does the industry see as future -- as the future for engineering
9 inspections such as the component design basis inspections? So what do you
10 see? And I guess I'll start with Elmo and Mano, but then others can join.

11 ELMO COLLINS: Thanks, Mike. I guess I'm supposed to kick this
12 one off. Let's see what happens. I think, I mean, it's obviously a very, very
13 pertinent question. We've already talked about it in this conference in some of
14 the speeches we heard about engineering expertise and the capability and
15 what's out there in the industry. It's an area we know is important. We had
16 specific aspects and inspection programs aimed at it, a number of them. That
17 changed after Davis-Besse. We formulated the component design basis
18 inspection. We changed the frequency on that inspection and now we're looking
19 at it again to see where we want -- what direction we want to go with the
20 engineering approach we're trying. You know, it's the same problem, but you
21 come at it from different ways. And so we have a working group that's pulled
22 together with all the regional offices in NRR, and -- to see what we want to do,
23 how we want to change that inspection procedure to focus it to be contemporary
24 with what might be in the industry. So I'd say the first thing is, you know, we see
25 some engineering expertise questions, and I think that's probably fairly well

1 established throughout the industry. And we're looking at that inspection to see
2 how we can redirect it.

3 MANO NAZAR: Mike, from my point of view, if you look at the
4 current processes, both internal and external, externally we have -- obviously you
5 are aware of the fact that INPO is spending a great deal of time to look into the --
6 all aspects of the operation from maintenance, engineering, and so on and so
7 forth, on regular basis. And internally when you're looking at how engineering
8 system and component [unintelligible] report that improved throughout the entire
9 industry, that there is significant effort and focus on every system or component
10 held, and then when you're looking at over time what has CDBI, you know,
11 accomplished, you know, that -- I think there is some retooling of CDBI is
12 perhaps warranted. We have cycled through most of these systems many, many
13 times, and so -- and now is -- you know, tend to either hear the similar kind of
14 things, very low level issues that are coming out of that. And as we are looking
15 at, again, going back to the aggregate impact, as we are adding more and more
16 activities to the plate, some area is probably warranted to look back and see if
17 the value added is supporting to continue with those activities, and certainly this
18 is one of those areas in my mind that we should relook at some restructuring,
19 retooling, or perhaps some elimination that is going to -- is going to help for us to
20 focus on most important things. We never really take anything off of our plate
21 and when you're looking at it for both agency and industry, there are limited
22 resources, limited funding, and this CDBI process is requiring significant energy
23 in preparation and then during the inspection time and the responses. So I
24 definitely feel that this is one area that it is warranted to look at for some -- at
25 minimum, some restructuring.

1 MICHAEL JOHNSON: Okay. Anyone else?

2 Okay. This next question: What is your perspective on the overall
3 performance of licensee corrective action programs? Utility corrective action
4 programs have grown increasingly complex in part, but not exclusively, due to an
5 increasing regulatory challenges. Do you see CAP programs as focused on
6 correcting conditions adverse to quality? And I guess I'll ask Chuck, if you would
7 start with that, and then Bryan, if you'd weigh in.

8 CHUCK CASTO: Yeah, and somebody prepared a two-page
9 answer for me here, so let me get started. No. [laughs] What -- you know, I think
10 the corrective action program's working really well, and you know, it's a
11 foundation of this industry, is a corrective -- you know, we got much better over
12 the years because of the corrective action programs and the use of the corrective
13 action programs. They're very robust, is what I'd call them, maybe not
14 complicated and burdensome. Mano may have a different term for that, but a
15 very robust and -- and I like, you know, we've got many utilities out there working
16 -- trying to work much more in prevention than corrective action, and I think that's
17 the right place to be in terms of preventing things. There's challenges with that,
18 but as we all know, the Reactor Oversight Process' foundation is built on a
19 corrective action program that's robust and that corrects problems and prioritizes
20 things.

21 So as -- if corrective action programs change in the future, then I
22 think that'll cause us to take, you know, an equivalent look at the Reactor
23 Oversight Process to see if changes need to be made in the Reactor Oversight
24 Process. I can't predict the future as regard to corrective action programs and
25 whether you stream -- if you streamline the -- as I -- and I don't think -- I don't

1 think anybody would argue with the streamlining, but if you change the efficacy of
2 the program, then that's a different -- that's a different situation. But as long as
3 the outcomes are achieved that you would get under today's program, I think
4 then that's okay to streamline the process. That wouldn't, I don't think, challenge
5 the foundation of the ROP, to streamline. But to change some other form, where
6 it -- where it's less effective, that would challenge the ROP, that -- in my opinion.

7 BRYAN HANSON: Yeah, Chris Mudrick, my peer, and I tell our
8 senior executive teams at the sites, you know, you can never go wrong if you
9 wrap yourself up in the cloak of the corrective action program. Our employees
10 write thousands of issue reports a year. It's important that the senior leadership
11 teams at the sites read those, understand the issues the employees are raising,
12 making sure they're being dealt with. You have to understand, though, or
13 recognize that it's not a perfect system. You don't fix every issue under the
14 corrective action program. You rely on binning, you rely on tracking and
15 trending, you rely on common cause analysis. We rely on apparent cause
16 analysis. That doesn't mean you always get the corrective action right. You may
17 have to take two swings at it. So we have to prioritize and make sure we use our
18 energy in the right levels, for those most significant, most risky things you do, like
19 root-cause analysis, so you do get to a corrective action to prevent recurrence.
20 For other issues, you may do an apparent cause. And so I think I -- you know, as
21 long as the senior leadership team backstops the various committees that look at
22 issue reports, that look at corrective action documents, you can't go wrong.

23 But with that, you know, we support -- Rob Gambone is leading an
24 initiative with INPO and the team. We support where Rob is working on to make
25 sure that we are getting the right return on the investment that the corrective

1 action program requires. But you know, our solid advice is, wrap yourself up in
2 the cloak, read the IRs. It tells you, gives you a good, strong pulse of the -- of the
3 activities at the site.

4 MICHAEL JOHNSON: Very good. Thanks, Bryan. Mano, you
5 have something to add?

6 MANO NAZAR: I'll just add a quick comment. I totally agree with
7 Bryan. I think that, you know, over time, over years, that we got to a point that
8 just number of the CRs, that single site of having 15- to 20,000 a year, you know,
9 it's very significant. I think that this is perhaps a challenge for industry rather
10 than in the regulatory side, because we clearly understand that some small
11 percentage of the CRs, perhaps about 20 to 30 percent of that, is falling under
12 risk-significant type issues. The problem we're having is with the rest of it, which
13 is 60 to 70 percent, to make the determination about do's and don'ts: which one
14 we should do work on, which one we shouldn't. I think that in absence of having
15 very effective upfront determination, giving that a screening, that we end of
16 having a lot more going into the "do" bucket, and then organization get
17 overwhelmed, and then we end up perhaps spending the energy on the things
18 that are not value-added, which we should work based on adverse trend rather
19 than just a CR. So that's more issue, employees for industry. We have to work
20 through that. I think that that more into the upfront determination of the process,
21 that'd be our challenge.

22 MICHAEL JOHNSON: Okay. We have a few minutes left. I'd like
23 to just allow that time to be used by the panelists to make any closing thoughts
24 they might have. I think I'll start with Elmo, actually. I don't know how well it's
25 known, so I'll make you know. Elmo is going to be retiring at the end of the

1 month. Elmo, of course, has had a distinguished career at the NRC. He has
2 been one of our leaders, certainly, over the years, one of my most cherished
3 friends. I think he's provided strong leadership, and we're certainly going to miss
4 him. So we'll start with you, Elmo, and give you a chance to speak, and then I'll
5 go to other members of the panel.

6 ELMO COLLINS: Well, thanks, Mike. I'll just offer -- since I've
7 become regional administrator, the way we've structured this session, this RIC
8 session, I think has made a difference. And for no one else, it's for my staff. I
9 think my staff sees the four regional administrators here together. We're, to
10 borrow a phrase we use in Region 4, "one team, one mission." That's what --
11 that's what the NRC is. And so we don't always get it right, and we're not
12 perfect, and our communication's not perfect. But that's certainly our objective,
13 and it's the right objective, and we understand that. So -- well, I'm thankful for
14 these RIC sessions, and I'm kind of sad to see it's my last one come to a close.
15 I'm not sad to not be asking any more -- answering any more questions about
16 cross-cutting issues and [inaudible] --

17 [laughter]

18 Thank you very much.

19 [applause]

20 BILL DEAN: All I really -- first of all, I echo what Elmo had to say --
21 had to say about the value of this and, you know, "one mission, one team." This
22 is clearly my favorite part of the RIC, when I get a chance to be up here with my
23 peers from the regions, and so I certainly enjoy this session. We had a lot of
24 questions about the Reactor Oversight Process and cross-cutting issues and
25 changes and so on and so forth, and I know Brian McDermott up here is leading

1 this independent initiative. I just want to state, you know, when we formed the
2 Reactor Oversight Process about 13 or so years ago, it was founded on a
3 number of pretty important principles and paradigms: open as transparency, risk-
4 informed, predictable, and I would want to make sure that if we -- and it is
5 probably 13, 14 years now since that. It's time to take a look at the Reactor
6 Oversight Process. Things have changed in 13 or 14 years, and are there some
7 things we could do differently? But we've got to make sure we go back to the
8 basics of the program, the bases for why we have the cornerstones that we do
9 and why we have inspectable areas that we do, and make sure we revisit and
10 understand if we want to change the bases, why we're changing them and for
11 good reasons. And so if we're going to look to make changes, we've got to start
12 from there. And so that's just a message, really, just for Brian, actually nobody
13 else in this room, so... [laughs]

14 MICHAEL JOHNSON: Thank you, Bill.

15 VICTOR MCCREE: Thanks. Well, let me just reiterate, it's also an
16 honor to participate in this panel. I've done it several times, and it has changed a
17 bit, and it would appear that within a year, it may change a bit more. But it's
18 always a learning experience to be here and a chance to offer some thoughts on
19 where we are, certainly from a process and oversight standpoint as well as from
20 a safety perspective. I recall that when I was given this opportunity to serve as
21 regional administrator a couple of years ago and as Commissioner Magwood
22 was leaving and turning the keys over from Louise, he said, "Don't break it,"
23 right? And a few weeks later was the Fukushima accident, and then we had a
24 series of multi-unit loss of offsite power -- reactor trips and loss of offsite power.
25 And I told him about a year later, "I didn't break it." And part of not breaking it is

1 that the plants responded well, and those of you out there within Surry or Browns
2 Ferry or North Anna, Catawba and others, you know, the plants responded well
3 in part because the equipment responded well, the emergency AC power
4 responded well, the people responded well. Lessons were learned from
5 Robinson of March 2010, and then again, the people responded well. But there's
6 a need to be vigilant. The next significant event is -- can occur, and the plant's
7 got to be ready, and the people got to -- have to be ready as well. And I'm
8 certainly proud of the folks, the people who work in Region II, who are continuing
9 to focus on operational safety. So thank you.

10 MICHAEL JOHNSON: Okay. Chuck.

11 CHUCK CASTO: I would say a couple of things. With my
12 experiences that I've had, first of all, if it's measurable it's bad, okay? If there's a
13 release of any kind and it's measurable, it's going to be really bad for this
14 industry. And it -- we can't let that happen here. We have to work every day to
15 prevent that from happening. Any release will be a really bad release. Your
16 utility and this NRC will never look the same after that.

17 And the second thing I would say is that this industry, over its 50-
18 some years, has had a lot of heroes, particularly operations: you know, the
19 Browns Ferry fire; Davis-Besse, first Davis-Besse event; the Fermi event; TMI;
20 Chernobyl; firefighters; helicopter pilots; Fukushima Daiichi, incredible set of
21 heroes there; the unheralded heroes at Fukushima Daini that we seldom talk
22 about, and the heroic efforts that they went through. And I think, really, as, you
23 know, as I take off -- get on the runway and taxi off, I think what we really have to
24 work on is no more heroes. Okay? We honor and we respect the heroes that
25 have -- that we've had in this industry over 50 years, and we don't want any

1 more, okay? We have to have processes and procedures and equipment and
2 regulators that don't put people in a position where they have to take heroic
3 action to protect the health and safety of the public. For me, that's what it's all
4 about; is not getting into those extremis situations where people have to make
5 really tough calls. And for the regulator, you have to do that through
6 independence, openness, and the diversity of the people in the agency. Without
7 those things, any one of those things, you will fail as a regulator.

8 So that's just -- I'd leave it at that.

9 MICHAEL JOHNSON: Thank you, Chuck. Bryan?

10 BRYAN HANSON: I would think we would transition now to a roast
11 of Elmo, and we should have an open mic for those that want to come up and
12 speak.

13 [laughter]

14 I think we covered a few topics today that I think were on people's
15 minds. And think that's important. I would encourage all of you, though,
16 because I know you have questions and you have, you know, assertions or even,
17 you know, contentious issues that you want answers for, and I'd encourage you
18 to use either the blue cards, or even better yet, test your communication protocol.
19 Go ask your counterpart, either on the utility side or the NRC side, and then ask
20 the tough questions. That's the important part of this conference I think, is to be
21 able to come away with answers to some of the tough questions that we wrestle
22 with throughout the course of the year. Thank you.

23 MICHAEL JOHNSON: Incidentally, Bryan, the Exelon team wanted
24 us to wish you a happy birthday.

25 [applause]

1 BRYAN HANSON: I'm not buying drinks if --

2 [laughter]

3 MICHAEL JOHNSON: Okay.

4 MANO NAZAR: Give out your room number.

5 BRYAN HANSON: Yeah, my room number.

6 [laughter]

7 MALE SPEAKER: 727 is his room number.

8 [laughter]

9 MANO NAZAR: Mike, I really don't have anything in addition
10 except that, as we talked about, really communication is essential and is vital to
11 our success. We talked about that earlier. And obviously this session is one of
12 those, but we cannot just stop at this level. I think that NEI is doing a good job of,
13 you know, coordinating a lot of our communication, interactions. But I encourage
14 the audience -- one thing that we've been doing, and similar to this concept, that
15 once a year myself and all of our executives, we meet with all of regional
16 administrators, at least from three regions, and a representative from NRR; and
17 that also has been a form of communication, interactions, because we truly
18 believe that that helps with the good decision-making. Because if you use the
19 right input into our decision-making, then you have better chance of making
20 better decisions. So I definitely would encourage these kind of interactions; not
21 just limited to today's, but outside here also. That's it.

22 MICHAEL JOHNSON: Thank you very much. Well I want to thank
23 the panelists for your great answers and your sage advice. I'd like to thank Julio
24 and the rest of the team for the work in supporting the panel. Like to just thank
25 the folks who supported us in the RIC session, collecting the questions and bring

1 them forward, so on and so forth. Thank you. I sincerely benefitted from this
2 panel, so good job.

3 [applause]

4 [Whereupon, the proceedings were concluded]