Appendix D

GUIDANCE FOR DOCUMENTING INSPECTION PROCEDURE 71152 IDENTIFICATION AND RESOLUTION OF PROBLEMS

One of the objectives of Inspection Procedure 71152 is to provide an assessment of the effectiveness of the licensee's problem identification and resolution (PI&R) programs. Consequently, the type of documentation for this inspection should be different than for other baseline inspections and may include more qualitative observations. Listed below are some general principles that apply to documenting the results of IP 71152. These principles supplement the guidance contained elsewhere in Inspection Manual Chapter (IMC) 0612.

1. The cover letter for this report should conform to the guidance given for other baseline inspections, but it should also contain a brief description of the team's overall conclusion regarding the effectiveness of the licensee's PI&R programs. A sample cover letter is provided in the sample inspection report contained in this Appendix.

2. The summary of issues for this report should contain the team's overall assessment of the licensee's PI&R program, on the basis of both the biennial in depth samples and routine baseline inspections. This overall assessment should also be placed in the PIM in accordance with the guidance in IMC 0306.

3. The inspection report should contain an assessment for each of the inspection requirements as follows. Some examples are provided in the attached example report and outline.

    a. Effectiveness of Problem Identification
    <u>Inspection Scope</u> - Briefly describe the scope of what was looked at to determine whether the licensee is identifying problems at the proper threshold and entering them into the corrective action system. Include samples taken from the previous 12 months of routine baseline inspection reports. Also include in this section the results of the team's review of licensee self-assessments and audits
    <u>Assessment</u> - Discuss issues and findings relative to the scope of the inspection and document general conclusions regarding effectiveness of problem identification. Included the basis for the general conclusion.

    b. Prioritization and Evaluation of Issues
    <u>Inspection Scope</u> - List the documents that were reviewed to determine whether the licensee is adequately prioritizing and evaluating issues. Include pertinent reference numbers (for example, NCR #s, violation #s, etc.).
    <u>Assessment</u> - Discuss issues relative to the effectiveness of the licensee's process for prioritizing issues, technical adequacy and depth of evaluations (including root cause analysis where appropriate),

consideration of operability and REPORTABILITY requirements, and identification of pertinent corrective actions. Include in this section any issues associated with the licensee's use of risk in prioritizing or evaluating issues. Document general conclusions regarding the above review.

c. Effectiveness of Corrective Actions
Inspection Scope - List the documents that were reviewed to determine the timeliness and effectiveness of corrective actions. Include pertinent reference numbers (for example, NCR #s, violation #s, etc.).
Assessment - Discuss issues relative to the subject area, including the effectiveness of corrective actions to prevent recurrence. Included within this section should be an assessment of the licensee's use of risk insights in prioritizing corrective actions. Document general conclusions relative to this subject area.

d. Assessment of Safety Conscious Work Environment
Inspection Scope - Describe what actions were taken to assess this subject area.
Assessment - This portion of the report should be more general in nature, as the procedure does not contain any specific inspection requirements with regard to this subject area. Discuss issues relative to the subject area. Document general conclusions relative to the subject area.

4. Negative conclusions regarding aspects of the PI&R program should be supported by examples of performance deficiencies. Other conclusions should be supported by a brief statement of the basis for the conclusion, including the scope of material that was reviewed.

(DATE)

(Addressee Full Name)
(Title)
(Utility Name)
(Plant Name)
(Full mailing address)

SUBJECT: (Plant Name) NRC PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT NO. (05000ddd/YYYY###)

Dear Mr. Smith:

On (Date), the U. S. Nuclear Regulatory Commission (NRC) completed a team inspection at the (Plant Name), the enclosed report documents the inspection findings, which were discussed on (Date) with (Name) and other members of your staff during an exit meeting (Date).

This inspection was an examination of activities conducted under your license as they relate to the identification and resolution of problems, and compliance with the Commission's rules and regulations and the conditions of your operating license. Within these areas, the inspection involved examination selected procedures and representative records, observations of activities, and interviews with personnel.

(If no findings were identified, then use the following:)

On the basis of the sample selected for review, there were no findings of significance identified during this inspection. The team concluded that problems were properly identified, evaluated, and resolved within the problem identification and resolution programs (PI&R). However, during the inspection, several examples of minor problems were identified, including conditions adverse to quality that were not being entered into the corrective action program, narrowly focused condition report evaluations, and corrective actions that were ineffectively tracked or had not occurred.

(If one or more findings were identified, then use the following:)

On the basis of the sample selected for review, the team concluded that in general, problems were properly identified, evaluated, and corrected. There was one green finding identified during this inspection associated with the depth and effectiveness of one root cause analysis. [Add one or two sentences to provide detail for each finding.] This finding was determined to be a violation of NRC requirements. However, because of its very low safety significance and because it has been entered into your corrective action program, the NRC is treating this finding as a noncited violation, in accordance with Section VI.A.1 of the NRC's Enforcement Policy. If you deny this noncited violation, you should provide a response with the basis for your denial, within 30 days of the date of this inspection report, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region ___; the Director, Office of Enforcement, U.S. Nuclear

Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the (Plant Name) facility.

In addition, several examples of minor problems were identified, including conditions adverse to quality that were not being entered into the corrective action program, narrowly focused condition report evaluations, and corrective actions that were ineffectively tracked or had not occurred.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web-site at http://www.nrc.gov/NRC/ADAMS/index. html (the Public Electronic Reading Room).

Sincerely,

SUMMARY OF ISSUES

ADAMS Template

IR (Docket and Report Number); (Utility Name); on (Date); (Plant Name); annual baseline inspection of the identification and resolution of problems. A violation was were identified in the area of root cause evaluations.

The inspection was conducted by a regional projects inspector, resident inspectors, and a regional radiation specialist. One green finding of very low safety significance was identified during this inspection and was classified as a noncited violation. The finding was evaluated using the significance determination process (SDP).

Identification and Resolution of Problems

The team identified that the licensee was effective at identifying problems and putting them into the corrective action program. The licensee's effectiveness at problem identification was evidenced by the relatively few deficiencies identified by external organizations (including the NRC) that had not been previously identified by the licensee, during the review period. The licensee effectively used risk in prioritizing the extent to which individual problems would be evaluated and in establishing schedules for implementing corrective actions. However, of the 10 root cause evaluations reviewed, 1 was found to be deficient in that it was not performed to a sufficient depth to determine the primary root causes of the finding. Corrective actions, when specified, were generally implemented in a timely manner. Licensee audits and assessments were found to be effective and highlighted a similar concern in the root cause area. On the basis of interviews conducted during this inspection, workers at the site felt free to input safety findings into the PI&R program.

Cornerstone: Mitigating Systems

Green: A violation 10CFR Part 50 Appendix B Criterion VI dispositioned as a noncited violation was identified because of a deficiency in the licensee's root cause evaluation (RC-001) of an inoperable turbine-driven auxiliary feedwater pump. The licensee's evaluation attributed the root cause of this finding to an improper overspeed trip setpoint caused by improper training of maintenance workers. During the inspection, NRC inspectors identified that the improper setpoint was actually the result of vendor manuals that were not up-to-date and contained inaccurate guidance concerning the calibration of the overspeed trip device.

The risk associated with the failure of the auxiliary feedwater pump had previously been determined to be of very low safety significance because of the redundancy in the auxiliary feedwater system.

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA2 Problem Identification and Resolution

a. Effectiveness of Problem Identification

(1) Inspection Scope

EXAMPLE: The inspectors reviewed items selected across the seven cornerstones of safety to determine if problems were being properly identified, characterized, and entered into the corrective action program for evaluation and resolution. Specifically, the inspectors selected 50 deviation and event reports (DERs) from approximately 2000 that had been issued between January 1999 and January 2000. The inspectors also reviewed several licensee audits and self-assessments, including two audits of the corrective action program. The effectiveness of the audits and assessments was evaluated by comparing the audit and assessment results against self-revealing and NRC-identified findings.

The inspectors evaluated the DERs to determine the licensee's threshold for identifying problems and entering them into the corrective action program. Also, the licensee's efforts in establishing the scope of problems were evaluated by reviewing pertinent control room logs, work requests, engineering modification packages, self-assessment results, system health reports, action plans, and results from surveillance tests and preventive maintenance tasks. The DERs and other documents listed in Attachment 2 were used to facilitate the review.

The inspectors also conducted walkdowns and interviewed plant personnel to identify other processes that may exist where problems and findings could be identified. The inspectors reviewed work requests and attended the licensee's daily work control meeting to understand the interface between the corrective action program and the work control process.

(2) Assessment

EXAMPLE: The team determined that the licensee was effective at identifying problems and entering them into the corrective action system. This was evidenced by the relatively few deficiencies identified by external organizations (including the NRC) that had not been previously identified by the licensee during the review period. Licensee audits and assessments were of good depth and identified issues similar to those that were self-revealing or raised during previous NRC inspections. Also, during this inspection, there were no instances identified where conditions adverse to quality were being handled outside the corrective action program.

b. Prioritization and Evaluation of Issues

(1) Inspection Scope

(2) Assessment

c. Effectiveness of Corrective Actions

(1) Inspection Scope

(2) Assessment

d. Assessment of Safety-Conscious Work Environment

(1) Inspection Scope

(2) Assessment

Attachments:

LIST OF PERSONS CONTACTED

LIST OF DOCUMENTS REVIEWED (optional if documents are identified in the body of the report)

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