

Report on Differing Professional View - Frequency of PIR Inspections

Summary of Concerns in the DPV

The originators of the DPV expressed two concerns in their memorandum. Both concerns related to implementation of the new inspection procedure (71152) "Identification and Resolution of Problems."

Their first and primary concern identified that the current inspection procedure, dated April 3, 2000, called for a significant increase in inspection resource expenditure as compared with the previous inspection procedure (40500.) The increase in inspection hours also results in increased licensee burden in the form of increased support for the inspection. The originators do not believe that the increase in inspection resources can be justified in view of historical inspection results. They recommend reducing the inspection frequency to biennial.

The originators' second concern relates to commitment of DRP resources to support the 71152 inspection. They note that, in the past, resident inspectors would be tasked with duties at their sites that would negatively impact their focus on the 40500 inspection. The lack of dedicated support has affected the quality of the inspection results, in their view.

Panel Observations

The Ad Hoc Review Panel had the following observations about the details of the first concern:

- The originators' comparison of resources does not consider time formerly charged by RIs to inspection procedure 71707 in inspecting licensee's corrective action programs. As a result, the originators' overestimated the increase in inspection hours as a result of performing the 71152 inspection annually. The panel concluded, however, that this discrepancy did not change the originators' conclusion. The originators agreed with the panel's observation.
- The DPV does not consider the broader perspective of impact of the revised oversight program. The experience from the Pilot Plants may indicate that, overall, the revised oversight program has reduced impact on licensees.
- The NRC does not currently have a process to measure the impact of inspection efforts on the licensees.
- The scope of the "Identification and Resolution of Problems" inspection does not have a rigorous basis. The panel is unaware of any formal evaluation performed to determine the appropriate scope, breadth, and frequency of Inspection Procedure 71152. Although the intent of the inspection procedure is to assess the effectiveness of a licensee's corrective

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action program, the procedure does not specify how to evaluate corrective action or a standard for assessing the acceptability of the corrective action program.

- The Office of Nuclear Reactor Regulation must decide questions of appropriate scope and frequency to insure consistent application of the reactor oversight program across the Regions.
- During discussions between the originators and the panel members, the originators observed that it commonly takes two or three years before corrective actions for programmatic inspection observations begin to have an effect.
- The increased impact on licensee resources during the Identification and Resolution of Problems inspection has the potential to adversely impact the licensee's ability to effectively manage its operation.
- The increased demand on inspection resources impacts the Region's ability to respond to reactive needs. The lead inspectors can no longer support reactive inspections.
- The engineering team inspection (71111.21) provides an alternate year check of the corrective action program. In addition, each baseline inspection procedure requires inspectors to verify the effectiveness of the licensee's identification and resolution of problems in the specific area inspected.
- Refueling outages, the engineering team inspection, and the corrective action program inspection create severe scheduling challenges. They all place significant demands on licensee resources, and they occur at different frequencies (18 months, 24 months, and 12 months, respectively.)
- Scheduling the Identification and Resolution of Problems inspections so that at least one refueling outage (at one unit sites, in particular) has transpired since the last performance of the procedure would provide more data for review and increase the effectiveness of the inspection.
- Licensee or NRC scheduling conflicts could result in two annual inspections at the same site within six months of each other, based on an annual inspection frequency.

The panel had the following observations about the second concern identified in the DPV:

1. The DRP and DRS staff recently developed a list of DRS led inspections supported by DRP (including 71152, engineering design team, etc.) This list identifies specific DRP inspectors assigned to DRS led teams. DRP will provide approximately 142 staff weeks of support.
2. In conversations between the DPV originators and panel members the originators agreed that this concern should be addressed to Region IV management.

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3. This concern does not involve a question of policy and does not qualify as the subject of a DPV.

Recommendations for Action

The panel makes the following recommendations:

1. Forward the DPV to the Executive Director for Operations for review of the first concern with the following recommendations
 - a. NRR should assess the results of each inspection as a function of expended resources.
 - b. The NRC should develop a method of measuring burden on licensee.
 - c. NRR should adjust inspection scope and/or frequency based on result of inspection assessment and burden on licensee.
 - d. The Regions should assist NRR by providing input to the assessment based on experience.
 - e. NRR should review availability of resources from other Regions to supplement Region IV inspection resources.
2. Regarding DRP support of DRS inspections (including inspection procedure 71152):
 - a. Region IV DRP management should emphasize the need for dedicated DRP support throughout the inspection until completion of documentation.
 - i. DRP may need to supply other resources to cover baseline inspection (including response to emerging problems) at a plant while the RI is otherwise committed to the 71152 inspection and documentation.
 - b. The Region should conduct an integrated evaluation of inspection requirements vs. resources to determine if the Region has sufficient staff to complete BI, anticipated supplemental inspection, training, admin, prep/doc, Annual Leave, Sick Leave, Significance Determination Process, allegations, Project Engineer tasks, etc. The outcome should be a plan to insure that available FTE supports accomplishing the inspection program.
 - c. The Region should review scheduling of Identification and Resolution of Problems inspections and engineering inspections at each facility to insure the impact is minimized through effective coordination of team inspections.

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- d. DRS and DRP should review the resources supplied in support of 71152 and other baseline team inspections to insure that no branch bears an excessive share of the burden and to verify effective use of resources.