

## Feedback Forms by Region

Number	Date of form	Date Rcvd in IIPB	Comments From	B.C. Review	Topic:	IIPB Contact	Date Initial Action	Date Final Action	Format	Region No.
--------	--------------	-------------------	---------------	-------------	--------	--------------	---------------------	-------------------	--------	------------

### Region 2

71111.02-1	05/03/2000	05/08/2000	M. Scott/MAS1	No	INSPECTION	Sam Malur	05/09/2000		Paper	
------------	------------	------------	---------------	----	------------	-----------	------------	--	-------	--

*Comments:* Sample size for .02 and .17 needs to be reduced for thorough review.

*IIPB Remarks:* Will incorporate at next revision.

0609G-6	05/05/2000	05/30/2000	E. DiPaolo	Yes	SDP	Peter Koltay			Elect	
---------	------------	------------	------------	-----	-----	--------------	--	--	-------	--

*Comments:* Questions on Mode 3 (hot shutdown) reactivity controls and applicability/adequacy of shutdown SDP.

*IIPB Remarks:*

0609-4	05/08/2000	05/10/2000	L. Wert	Yes	SDP	Peter Koltay			Paper	
--------	------------	------------	---------	-----	-----	--------------	--	--	-------	--

*Comments:* Fuel handling issues not easily captured by SDP. Include in SDP

*IIPB Remarks:*

2515A-3	05/09/2000	05/16/2000	P.K. Van Doorn	Yes	INSPECTION	Steven Stein	05/17/2000		Elect	
---------	------------	------------	----------------	-----	------------	--------------	------------	--	-------	--

*Comments:* How to deal with few or no risk related inspection samples? Effects on program completion?

*IIPB Remarks:* Email commenter; develop better guidance

2515A-7	05/09/2000	05/30/2000	P.K. Van Doorn	Yes	INSPECTION	Steven Stein	05/30/2000		Elect	
---------	------------	------------	----------------	-----	------------	--------------	------------	--	-------	--

*Comments:* Recognizing that sig activities should be inspected even if sample reqmts met, is it acceptable to pick additional samples just to fill inspectors time? Is there a limit on sample sizes.

*IIPB Remarks:* BC's response was correct. Inspectors should not be selecting more samples simply because they have time for more inspection, and the associated branch chief needs to know when and why an inspector plans to deviate from the procedure even though the program allows it. The guidance for level of effort will be reevaluated following the first year of implementation of the revised oversight process.

71111.16-8	05/09/2000	05/30/2000	M. Scott/MAS1	No	INSPECTION	Jim Isom			Elect	
------------	------------	------------	---------------	----	------------	----------	--	--	-------	--

*Comments:* Specific condition explained, may not be significant but meets attachment's intentions.

*IIPB Remarks:*

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	---------------	---------------------	----------------------------	--------------------------	---------------	-------------------

0609.02-2	05/10/2000	05/11/2000	C. Ogle	Yes	SDP	Peter Koltay			Elect	
-----------	------------	------------	---------	-----	-----	--------------	--	--	-------	--

*Comments:* No direct shutdown Rx questions in Group 2 of Sup 2 of SDP. What leads inspector to S/D SDP? Appen G questions overly subjective.

*IIPB Remarks:*

0610S-15	05/26/2000	05/26/2000	P. Fredrickson	Yes	OTHER	Ron Frahm	06/14/2000		Elect	
----------	------------	------------	----------------	-----	-------	-----------	------------	--	-------	--

*Comments:* [Comment received from Region II via e-mail]

Need to look at how Appendix C goes into much detail on how to include URIs in the PIM and then change them later. This is inconsistent with other 0610\* guidance that doesn't allow URIs in the PIM. I know what the problem is. Appendix C is verbatim from how we used to do the PIM in pre-ROP days. IIPB needs to scrub the appendix to make sure that it agrees with our current ROP process.

*IIPB Remarks:* 0610\* is being revised, including PIM guidance.

71111.02-21	05/31/2000	06/16/2000	D. Roberts	Yes	INSPECTION	Sam Malur	07/31/2000		Elect	
-------------	------------	------------	------------	-----	------------	-----------	------------	--	-------	--

*Comments:* 1. Based on the above discussion, upgrade 10 CFR 50.59 then change the inspection module to complement that change. The historical plant basis and the [change, test or experiments] safety impact needs to be considered during a modification review.  
 2. Reduce module sample size as discussed above.  
 3. The module does not have a completed explanation of the documents to be reviewed. Insert "plant modification" definition found in section 02.01 of 71111.17 into the module. Also, it is observed that other licensee documents get 50.59 reviews depending on the licensee (e.g., operability evaluations and degraded items under Generic Letter 91-18). The definition should be expanded to review any licensee documents worthy of their 50.59 reviews.  
 4. In module 71111.02, there is a conflict between sample sizes. In the "Level of Effort" section one sample size is invoked while in section 2.01 there is a different sample size called out.  
 5. As discussed above, instead of selecting from all cornerstone areas, select from the risk significant licensee 50.59 reviewed population of documents. The population should be canvassed to review all cornerstones' risk significant documents during the sample selection process.

*IIPB Remarks:* Acknowledge receipt of comments for incorporation in the next revision.

71111.13-11	06/06/2000	06/09/2000	G. F. Guthrie	Yes	INSPECTION	Roy Mathew		06/21/2000	Elect	
-------------	------------	------------	---------------	-----	------------	------------	--	------------	-------	--

*Comments:* The Assessment of Management Risk (Appendix A) flow chart is unclear.

*IIPB Remarks:* Item 1 - The reason for using ICDF value for item (4) of the flow chart is to identify high risk maintenance risk configurations that increase the core damage frequency and is not time dependent. We want the licensee to take actions when ICDF is greater than 10<sup>-3</sup>/yr to avoid operating the plant in high risk configuration. ICCDP or ICDP is time dependent and therefore items 4 and 5 thresholds are specified in ICDP or ICCDP. These thresholds are specified in NUMARC 93-01, Section 11.3.7.

Item 2 - ICDP and ICCDP criteria apply only when multiple systems are taken out of service. When one system is taken out of service, the licensee needs to follow the TS LCO/ AOT requirements and their procedures.

Note: Maintenance Branch is conducting site visits at five plants to collect information regarding the licensee's risk assessment tools and processes for risk assessment. The procedure will be revised by 9/28 to provide further clarification and guidance for risk assessment.

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
71153-16	06/06/2000	06/06/2000	L. Plisco	No	INSPECTION	Don Norkin	06/20/2000		Elect	
<p><i>Comments:</i> 1. Appendix A implies that the only events reviewed by this procedure are reactor trips with complications. There are many other types of events, including shutdown events, that should get an initial follow up by the resident inspectors.</p> <p>2. Appendix B would be more appropriately documented in a separate Manual Chapter rather than in this IP. This general guidance for inspector conduct in the control room and limiting impact during events is overall program guidance, not only related to this specific inspection procedure, and therefore should be captured in a manual chapter.</p> <p><i>IIPB Remarks:</i> The focus of IP 71153 is to screen out uncomplicated reactor trips and support risk analysis and CCDDP determination for events complicated by loss of mitigation equipment or operator error. Appendix B on Limiting NRC Impact During Events was formerly in MC 2515. It was considered more appropriate for the event followup IP than for high level guidance in MC 2515.</p>										
0608-10	06/07/2000	06/09/2000	T. Easlick	Yes	PI's	Don Hickman			Elect	
<p><i>Comments:</i> ERO drill participation PI does not provide meaningful data for Brunswick</p> <p><i>IIPB Remarks:</i></p>										
93812-14	06/07/2000	06/07/2000	L. Plisco	No	INSPECTION	Don Norkin	06/20/2000		Elect	
<p><i>Comments:</i> 1. Section 02.01.c discusses the quarantined equipment list (QEL). Quarantined equipment would be very unlikely for an event where only a special inspection is being conducted. This appears to be a holdover from the AIT/IIT procedure that this procedure was derived from, and we recommend that it be deleted.</p> <p>2. A Preliminary Notification for a special inspection is inappropriate. Review of the Preliminary Notification Manual Chapter highlights the significant events that result in PNs, and special inspections clearly do not rise to the same level of significance. A Morning Report would be more appropriate for these lower significance activities. Again, this appears to be a holdover from the AIT procedure, from which this procedure was derived.</p> <p>3. Section 03.01.d states that it is not the responsibility of an SI to address licensee actions related to plant restart. This is appropriate, but plant restart review is also not included in inspection procedure 71153, where it would be appropriate to review restart issues. We have submitted a separate feedback form to recommend 71153 be revised to include review of licensee actions related to plant restart.</p> <p><i>IIPB Remarks:</i> IP 93812 will be revised to address comments on quarantined equip and PN</p>										
71111.11-12	06/09/2000	06/12/2000	E. Guthrie	Yes	INSPECTION	Don Norkin	06/28/2000		Elect	
<p><i>Comments:</i> Findings from this inspection have no actual impact on plant equipment or operator response. Recommends: Clear definition of minimum finding, examples of findings and how to disposition (with clear nexus to perf problems in plant before documenting).</p> <p><i>IIPB Remarks:</i> We plan to delete Section 03.10, because IMC 0610* defines which findings to document. An SDP for operator requal is being reviewed by the regions and NEI. This SDP will be the basis for human performance issues.</p>										

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>IIPB Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	--------------------	---------------------	----------------------------	--------------------------	---------------	-------------------

0608-17	06/12/2000	06/21/2000	E. DiPaolo/EMD	Yes	PI's	Don Hickman			Elect	
---------	------------	------------	----------------	-----	------	-------------	--	--	-------	--

*Comments:* Consideration should be given to revising the Reactor Coolant System (RCS) Activity performance indicator (PI). The objective of this Barrier Integrity Cornerstone PI is to provide reasonable assurance that the physical design barrier, in this case fuel cladding, protects the public from radiological releases caused by accidents. The current threshold, from green to white, is 50% of the Technical Specification (TS) limit for dose equivalent iodine-131, typically 3.2 micro curies/gram. Typical values for dose equivalent iodine-131 are in the 1x10-5 micro curies/gram range for Unit 2 and the 1x10-4 micro curies/gram range for Unit 3 range at Browns Ferry. Even with a recent history of fuel cladding leakage, the Unit 3 values are only a fraction of the TS limit (maximum indicator value of .1% of TS value). A sample review of NRC Web Page PI data shows that Browns Ferry values are in-line with other plants. Crossing the threshold from green to white at the current level would result in plant radiological conditions so severe that other regulatory requirements (e.g., ALARA) would have required earlier licensee action. Therefore, minimal value is gained by the PI in it's current form.

***IIPB Remarks:***

71152-13	06/13/2000	06/13/2000	L. Plisco	No	INSPECTION	Jeff Jacobson	07/25/2000		Elect	
----------	------------	------------	-----------	----	------------	---------------	------------	--	-------	--

*Comments:* 1. This inspection does not need to include a review of issues that could affect unavailability of equipment tracked by the performance indicators (para. 02.02.d) because the performance indicator verification procedure adequately reviews this area.

2. The review of whether there is indication that licensee personnel may be reluctant to report safety issues (para. 02.02.f) is problematic. This part of the inspection should be revised significantly or deleted. The most accurate method to address this inspection objective is to use a professionally developed survey instrument, but it is my understanding that the Commission has directed that surveys not be conducted. The method implied by this procedure is to ask "some" questions to staff members during the course of the inspection. In this inspection, which is largely a paper review, most of the staff members interviewed will be licensee management and support staff instead of line workers, thus the procedure method is not likely to identify any concerns. Section 03.02.d should be rewritten to provide more specific guidance on how to conduct this part of the inspection and how to determine the meaning of the results.

3. It may not be worthwhile to review a sample of NCVs as part of the annual inspection. This portion of the review may be more effective and efficient as part of the routine review in plant status and the individual inspectable area procedures. Since the NCVs, by definition, are low risk issues, it does not appear to be time well spent by the annual review to look at these issues because they should focus on risk-significant issues.

4. The annual review would be most effective in achieving the inspection objectives by using a "vertical slice" approach for several risk-significant systems rather than trying to scan the entire database of items in the corrective action system.

*IIPB Remarks:* 1. This inspection does not need to include a review of issues that could affect unavailability of equipment tracked by the performance indicators (para. 02.02.d) because the performance indicator verification procedure adequately reviews this area.

2. The review of whether there is indication that licensee personnel may be reluctant to report safety issues (para. 02.02.f) is problematic. This part of the inspection should be revised significantly or deleted. The most accurate method to address this inspection objective is to use a professionally developed survey instrument, but it is my understanding that the Commission has directed that surveys not be conducted. The method implied by this procedure is to ask "some" questions to staff members during the course of the inspection. In this inspection, which is largely a paper review, most of the staff members interviewed will be licensee management and support staff instead of line workers, thus the procedure method is not likely to identify any concerns. Section 03.02.d should be rewritten to provide more specific guidance on how to conduct this part of the inspection and how to determine the meaning of the results.

3. It may not be worthwhile to review a sample of NCVs as part of the annual inspection. This portion of the review may be more effective and efficient as part of the routine review in plant status and the individual inspectable area procedures. Since the NCVs, by definition, are low risk issues, it does not appear to be time well spent by the annual review to look at these issues because they should focus on risk-significant issues.

4. The annual review would be most effective in achieving the inspection objectives by using a "vertical slice" approach for several risk-significant systems rather than trying to scan the entire database of items in the corrective action system.

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	---------------	---------------------	----------------------------	--------------------------	---------------	-------------------

71153-9	06/14/2000	06/06/2000	C. Ogle	Yes	INSPECTION	Don Norkin	06/20/2000		Elect	
---------	------------	------------	---------	-----	------------	------------	------------	--	-------	--

*Comments:* IP doesn't allow residents to observe PORC meetings before restarting after a plant trip.

*IIPB Remarks:* Proposed an addition to IP for next revision.

71153-22	06/15/2000	06/26/2000	J. Lennartz/JAL3	No	INSPECTION	Don Norkin	06/28/2000	06/28/2000	Elect	
----------	------------	------------	------------------	----	------------	------------	------------	------------	-------	--

*Comments:* There is no procedure in the program that resident inspectors can charge time to for followup on events in the plant support area. For example, a recent lightning strike at Palisades resulted in some security safeguards equipment to be rendered inoperable which required compensatory measures to be implemented by the licensee. I wanted to verify that the compensatory measures were in place as described by the licensee and that they were adequate. However, the event followup procedure (71153) (which I ended up charging my time to) doesn't appear to be applicable to events that affect the plant support area.

We need something in the program to allow the residents flexibility to conduct a quick followup of plant support type issues without using up allotted hours in the plant status procedure.

*IIPB Remarks:* IP 71153 pertains to all cornerstones and is therefore applicable to events that affect security safeguards. Section 03.02 addresses event report review, which includes NRC followup on licensee corrective actions.

0609A-18	06/20/2000	06/21/2000	T. Morrissey/bxm	Yes	SDP	Peter Koltay			Elect	
----------	------------	------------	------------------	-----	-----	--------------	--	--	-------	--

*Comments:* SDP, Table 1 entitled, "Estimated Likelihood for Initiating Event Occurrence During Degraded Period." has a note associated with the table that is not clear nor understandable. Row IV in the table lists ATWS-PWR (elect only) as an Example Event Type. Yet the note specifies that ATWS-PWR (Elect Only) is provided for information only and ATWS-PWR (Mech Only) should be used as applicable when performing SDP phase 2 analysis. Several people I talked to were also not sure how to handle an ATWS electrical issue. Do we use the row in the table for ATWS-PWR (Mech Only) for electrical ATWS issues? The note says ATWS-PWR (Mech Only) should be used as applicable.... Are electrical ATWS issues applicable? If we are not able to use ATWS-PWR (Elect only) why not just have one ATWS-PWR event type?

*IIPB Remarks:*

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	---------------	---------------------	----------------------------	--------------------------	---------------	-------------------

0609H-102	06/26/2000	08/03/2000	B. Holbrook / J. Yes	SDP		Peter Koltay			Elect	
-----------	------------	------------	----------------------	-----	--	--------------	--	--	-------	--

*Comments:* Hatch had two valves (in series) fail a local leak rate test (LLRT). The valves are on for the drywell floor drain sump system (Mark I Containment) that pumps to a tank in radwaste. This bypass leakage is not filtered by the standby gas treatment (SBGT) system and is not monitored for a ground level release. The Tech Spec allowable leakage for all secondary containment bypass valves is 544 ACCM while the valve leakage identified was 7520 ACCM. The problem was identified during routine LLRT testing while in a refueling outage. The staff determined that this problem was not a licensee performance issue and was screened out of the SDP. However, several "What If" questions surfaced.

1. If a condition is containment bypass as indicated on the screening worksheet and Appendix H of IMC is not for use at this time, how would this situation be handled?

The proposed guidance for Appendix H is for significant issues that could influence CDF. If CDF would not be affected how would this be handled?

2. The proposed guidance states that the focus on the LERF SDP is for internal events while at full power. What section would be used if the plant was not at full power?

3. If a situation arose (a 3 or 4 inch containment bypass line open) and the SDP process led to Figure 1 on page H-4, ie. Inspection finding and degraded SSC identified with CDF not affected, is it correct to believe that the containment function would be affected and lead to type B findings? Would we consider "Containment Function Affected" due to bypass leakage in a 3 or 4 inch piping system or does Containment Function Affected mean "significant" degradation or failure of containment?

4. The "SSC affected by column," on Table 3, for Type B findings, (page H-7) does not include a BWR Mark I Containment. Are there no Mark 1 penetration seals, isolation valves, or purge and vent lines with the potential to influence LERF?

***IIPB Remarks:***

71111.17-52	06/27/2000	07/08/2000	Billy Crowley/ br Yes	INSPECTION		Sam Malur	07/31/2000		Elect	
-------------	------------	------------	-----------------------	------------	--	-----------	------------	--	-------	--

*Comments:* If the intent is to look a sample modification packages in detail, the sample size should be cut in half for the number of hours (80) given in the resource estimate. Evaluation of twenty to twenty-four modification packages and associated implementation documentation cannot be accomplished in any detail in 80 hours. Also, why not combine the Plant Modification Procedure (Attachment 17) with the 10 CFR 50.59 Procedure (Attachment 02) since the population of plant changes reviewed will most likely be the same for both procedures?

*IIPB Remarks:* Informed commenter that the sample size has been reduced in the first quarterly revision. Other comments will be reviewed.

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
0609A-99	06/28/2000	08/02/2000	Darrell J. Robert	Yes	SDP	Peter Koltay			Elect	

**Comments:** Question:

Can the same "T/2" reporting criteria that is applied to fault exposure hours for the safety system unavailability (SSU) PI be applied to the Significance Determination Process when evaluating inspection findings for which there is no known date of occurrence? And can this logic be extended to those safety system trains for which there is no Performance Indicator? (Note: T = time since most recent successful surveillance test)

**Example:**

A safety-related steam generator PORV, for which there is no SSU Performance Indicator, was discovered to be inoperable at Catawba Unit 2 during a surveillance test. After independent investigations, both the NRC and licensee concluded that the valve was inoperable due to a mis-set nitrogen pressure regulator, which controls the amount of N2 pressure to the valve in order for it to open. (The valve must be capable of being manually opened from the control room to meet TS surveillance criteria.) The exact time of occurrence was indeterminate based on a review of maintenance and security records. In accordance with existing NRC guidance on reportability and determination of past inoperability, the licensee determined that the valve, which was repaired immediately, had become inoperable at the time of discovery, and therefore, no TS violation occurred.

For the SDP, should we apply the same T/2 criteria to this valve that we use to assign fault exposure hours to other safety systems that, unlike S/G PORVs, are monitored under the PI program? Guidance for reporting SSU fault exposure hours states that the period of unavailability is equal to half the time between the most recent successfully completed surveillance test and the one in which the failure was identified. Should we apply this philosophy to safety systems when addressing the Phase 1 questions for determining period of inoperability (Question 3 under Mitigating System column) or the Phase 2 process for estimating the likelihood of the scenarios affected by the unavailability?

Statements in Appendix A of MC 0609 suggest that we should apply the same logic: "The SDP described in this appendix...estimates the risk-significance of inspection findings using the same 'scale' that is used for the risk-informed PIs so that licensee performance can be assessed by comparing and 'adding' the contributions of both PIs and inspection findings." It further states, "a bounding determination of significance may be made by assuming a worst-case condition (e.g. assume complete loss of function even if unsupported by the facts known at the time). If a bounding determination results in greater than green, greater factual detail will be necessary to complete the SDP."

**IIPB Remarks:**

71111.02-54	07/07/2000	07/17/2000	J Coley/JLC2	Yes	INSPECTION	Sam Malur	07/31/2000		Elect	
-------------	------------	------------	--------------	-----	------------	-----------	------------	--	-------	--

**Comments:** Time allow for this inspection may be adequate at some sites, and not at others. For instance Virginia Power installed a computer in the room we were in which had files of their TS, UFSARs, and Drawings. This was a big help and I don't know if we could have finished this inspection within allowed time without it.

Additionally, current guidance says to select 15 changes, tests, or experiments that were screened out by the licensee as not requiring a safety evaluation. Some licensee's maintain a central database of all screen-outs making sample selection easy. Other licensees (such as Surry) do not maintain a database. Each individual screen-out record is filed as part of the respective plant modification, procedure change, test, or experiment. The sample selection for screen-outs only included plant modifications which the licensee had determined had not required a 10 CFR 50.59 safety evaluation. NRC review of a sample selection that included each of these areas would have involved excessive amount of time. Any known procedure change, test, or experiments for which the licensee had determined as not requiring a safety evaluation could have been included within the sample selection. However, none were identified by the inspectors.

**IIPB Remarks:** Acknowledged comments for resolution in the next revision of the IP.

71114.06-93	07/07/2000	07/26/2000	cap2@nrc.gov	Yes	INSPECTION	Roy Mathew			Elect	
-------------	------------	------------	--------------	-----	------------	------------	--	--	-------	--

**Comments:** This only has ten hours for three drill evaluations. A typical drill lasts 4 hours with a critique lasting at least an hour. If both residents observe from different locations, the time can be 8-10 hours per drill. Recommend that more hours are added, for example double to 20, for resident drill evaluations.

**IIPB Remarks:**

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>IIPB Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	--------------------	---------------------	----------------------------	--------------------------	---------------	-------------------

0609H-55	07/17/2000	07/17/2000	S. Cahill	Yes	SDP	Peter Koltay			Elect	
----------	------------	------------	-----------	-----	-----	--------------	--	--	-------	--

*Comments:* Hatch had two valves (in series) fail a local leak rate test (LLRT). The valves are on for the drywell floor drain sump system (Mark I Containment) that pumps to a tank in radwaste. This bypass leakage is not filtered by the standby gas treatment (SBGT) system and is not monitored for a ground level release. The Tech Spec allowable leakage for all secondary containment bypass valves is 544 ACCM while the valve leakage identified was 7520 ACCM. The problem was identified during routine LLRT testing while in a refueling outage. The staff determined that this problem was not a licensee performance issue and was screened out of the SDP. However, several "What If" questions surfaced.

1. If a condition is containment bypass as indicated on the screening worksheet and Appendix H of IMC is not for use at this time, how would this situation be handled?

The proposed guidance for Appendix H is for significant issues that could influence CDF. If CDF would not be affected how would this be handled?

2. The proposed guidance states that the focus on the LERF SDP is for internal events while at full power. What section would be used if the plant was not at full power?

3. If a situation arose (a 3 or 4 inch containment bypass line open) and the SDP process led to Figure 1 on page H-4, ie. Inspection finding and degraded SSC identified with CDF not affected, is it correct to believe that the containment function would be affected and lead to type B findings? Would we consider "Containment Function Affected" due to bypass leakage in a 3 or 4 inch piping system or does Containment Function Affected mean "significant" degradation or failure of containment?

4. The "SSC affected by column," on Table 3, for Type B findings, (page H-7) does not include a BWR Mark I Containment. Are there no Mark 1 penetration seals, isolation valves, or purge and vent lines with the potential to influence LERF?

***IIPB Remarks:***

0609F-90	07/17/2000	07/21/2000	Eva A. Brown/ea	Yes	SDP	Peter Koltay			Elect	
----------	------------	------------	-----------------	-----	-----	--------------	--	--	-------	--

*Comments:* Use of Appendix F was cumbersome to use when the site experience a loss of the fire water pumps. The SDP does not deal with multi-unit issues very well. If used as is, the SDP review would require analysis of every fire area for both units and common areas. Even limiting the review to the five most risk significant areas for both units was cumbersome. Additionally, the affects of equipment degradation or malfunction of SSD equipment is not accounted for in the Phase 1 Step 1 decisions.

Also, better guidance for plant level events is needed (i.e. loss of firewater). For the same issue discussed the interdependencies for some areas complicated the review.

The flowcharts for Phase 1 Step 2 are not easy to use. It is cumbersome to determine which figure applies to the affected area.

These comments/recommendations were discussed briefly during the Triennial fire Protection Training course with Pat Madden, Leon Whitney, and others.

***IIPB Remarks:***

0609F-91	07/17/2000	07/21/2000	Eva A. Brown/ea	Yes	SDP	Peter Koltay			Elect	
----------	------------	------------	-----------------	-----	-----	--------------	--	--	-------	--

*Comments:* At this site, access to the IPEEE code is not readily available and previous resident inspection has uncovered inaccuracies in some of the assumptions, making the results for some areas questionable. For fire events that go to Phase 3 for resolution, what is to be done when the licensee is incapable of providing an accurate number based on the IPEEE?

***IIPB Remarks:***

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	---------------	---------------------	----------------------------	--------------------------	---------------	-------------------

0609-92	07/17/2000	07/21/2000	Eva A. Brown/ea	Yes	SDP	Peter Koltay			Elect	
---------	------------	------------	-----------------	-----	-----	--------------	--	--	-------	--

*Comments:* For component failures, when the out of service (OOS) time is less than a day, how long does the component have to be OOS before being dispositioned using the SDP? Is the time frame on the order of an hour, twelve hours, or sometime greater?

*IIPB Remarks:*

2515D-98	07/18/2000	08/01/2000	Mel Shannon M	Yes	OTHER	Steven Stein			Elect	
----------	------------	------------	---------------	-----	-------	--------------	--	--	-------	--

*Comments:* D. Once a week, tour accessible areas of the plant containing risk significant SSCs...

At Oconee risk significant SSCs are in just about every building in the plant. For example the TDEFW and EFW pumps are in the turbine building, the switchyard is safety related due to the Keowee overhead power lines, etc. This results in more than the allotted time to tour the areas on a weekly basis. When added to the control room walkdown and log review, attendance at status meetings and problem report review, the plant tours would result in a significant over budget on plant status for a three unit site (850 hrs). See the following estimates:

Control room walkdown 30 min/day  
 log review 30 min/day  
 status meetings 30 min/day  
 problem report review 30 min/day

Total 2 hrs/day X 5 days/wk X 52 wks/yr = 520 hours We have developed 12 different tour areas at Oconee. In order to tour all of these areas with a reasonable tour it takes us about 12.5 hours. This does not include time spent processing through security or HP, or traveling to and from the inspection site.

12.5 hrs/wk X 52 wks/yr = 625 hours

Instead of performing the review of all areas each week, we have been performing each of the plant tours at least every other week. This appears to be a better use of resources and we feel still accomplishes the intent of this procedure. In addition, we feel that this will still provide adequate oversight in this area.

We suggest a change to Appendix D for Plant Status to allow flexibility in performing the plant tours.

*IIPB Remarks:*

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>IIPB Topic:</i>	<i>Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	--------------------	----------------	----------------------------	--------------------------	---------------	-------------------

0609.02-95	07/19/2000	07/31/2000	Eugene DiPaolo/	Yes	SDP	Peter Koltay			Elect	
------------	------------	------------	-----------------	-----	-----	--------------	--	--	-------	--

*Comments:* The Group 2 questions in MC 0609, Attachment 0609.02 and MC 0610, Appendix E are provided to determine whether an issue affects a cornerstone. Answering "yes" to any question in Group 2 requires that the issue be analyzed by the significance determination process (SDP), assigned a color, and documented in the inspection report. Consideration should be given to revising these questions because, in their current form, they may lead an inspector to analyze a finding using the wrong SDP process in certain situations.

This recommendation is the result of a finding at the Browns Ferry Nuclear Plant involving the Control Room Emergency Ventilation (CREV) system. This system is design protect control room operators during abnormal radiological conditions such as during a design basis accident. Plant procedures were found to be inadequate in that the system could have been rendered incapable of fulfilling its design function under certain accident conditions. Initial screening of the issue indicated that the most appropriate cornerstone was the Occupational Radiation Safety Cornerstone. This was concluded by answering "yes" to question #4 in that area which states "Does it involve a failure of one or more radiation barriers that result in, or could result in, a significant unintended or unplanned dose?".

After consultation with Region II and NRR personnel, the correct cornerstone and SDP process to use for the finding was the Reactor Safety SDP under Containment Barriers (Phase 1, question 1 of that SDP directly addresses the degradation of the radiological barrier function provided for the control room). Additionally, Phase 1 (question 2) addresses the degradation of the barrier function of the control room against smoke or a toxic atmosphere. However, there are no Group 2 questions in MC 0609, Attachment 0609.02 and MC 0610, Appendix E which clearly indicates that degradation of the control room barrier function against radiation, smoke, or a toxic atmosphere would effect the Reactor Safety Cornerstone because the control room envelope is not considered a part of reactor containment at most nuclear power plants.

One solution to this problem would be to revise Group 2, question #3 in MC 0609, Attachment 0609.02 and MC 0610, Appendix E to more clearly indicate that systems designed to protect operators from ambient effects (i.e., radiation, smoke or toxic gas) are considered reactor containment systems.

***IIPB Remarks:***

71111.19-96	07/19/2000	07/31/2000	Bob Hagar (RCH	Yes	INSPECTION	Roy Mathew			Elect	
-------------	------------	------------	----------------	-----	------------	------------	--	--	-------	--

*Comments:* [Detailed comments and recommendations for specific sections in procedure]

***IIPB Remarks:***

71121.02-101	07/20/2000	08/03/2000	Daniel W. Jones	No	INSPECTION	Jim Isom			Elect	
--------------	------------	------------	-----------------	----	------------	----------	--	--	-------	--

*Comments:* During a recent inspection I was provided a listing of individual exposures for workers assigned to the plant's Mechanical Maintenance Department. 500 individuals had incurred a measurable dose of more than 10 mrem during the current year. The distribution of those exposures was as follows:

No. of Workers	Dose (mrem)	No. of Workers	Dose (mrem)
2	900 - 1000	30	400 - 500
5	800 - 900	49	300 - 400
7	700 - 800	67	200 - 300
19	600 - 700	96	100 - 200
13	500 - 600	212	<100

The inspection procedure does not provide guidance to the inspector as to whether the above distribution represents a "significant" variation of exposures.

***IIPB Remarks:***

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
---------------	---------------------	--------------------------	----------------------	--------------------	---------------	---------------------	----------------------------	--------------------------	---------------	-------------------

0609G-97	07/26/2000	08/01/2000	Bob Hagar (RCH Yes	Yes	SDP	Peter Koltay			Elect	mc0609_appg_7_26
----------	------------	------------	--------------------	-----	-----	--------------	--	--	-------	------------------

*Comments:* 1. IMC 0609 appendix G includes several checklists and instructions for inspectors to use those checklists to verify licensee attributes during shutdown operations. These checklists/instructions look very much like inspection requirements that would be more appropriately placed in 71111.20 than in this appendix.

2. The format of the checklists in this appendix makes them difficult to use.

Recommendation:

1. From this appendix, remove all inspection requirements. Focus this appendix on assessing the significance of shutdown findings.
2. Into 71111 attachment 20, insert the inspection requirements that were removed from this appendix.
3. In 71111 attachment 20, format the checklists similar to the attached checklist.

*IIPB Remarks:*

71111.07-108	08/01/2000	08/04/2000	jlc2nrc.gov	Yes	INSPECTION	Michael Maley			Elect	
--------------	------------	------------	-------------	-----	------------	---------------	--	--	-------	--

*Comments:* This is an interesting module to run, I have found minor violations every time I've run this document. So I feel my efforts have been somewhat successful in keeping the licensee on his toes in this area.

*IIPB Remarks:*

0609H-103	08/02/2000	08/03/2000	RKC1@NRC.G	Yes	SDP	Peter Koltay			Elect	
-----------	------------	------------	------------	-----	-----	--------------	--	--	-------	--

*Comments:* [Detailed discription of specifc conditions and SDP guidance.]

*IIPB Remarks:*

0102-100	08/02/2000	08/04/2000	Loren Plisco	Yes	OTHER				Elect	LRP-04
----------	------------	------------	--------------	-----	-------	--	--	--	-------	--------

*Comments:* MC 0102, Oversight and Objectivity of Inspectors and Examiners ant Reactor Facilities, Section 04.03.d, requires that SRIs and RIs spend a minimum of one week per year performing inspection activities at another site for objectivity. The MC states that this may be accomplished by participating in a team inspection at another site, or during backup site familiarization visits. The purpose of the objectivity visit is to provide an opportunity to observe and interact with other NRC staff members and to broaden the experience of the inspector.

There are other development activities that can be conducted by inspectors that would also provide an opportunity to broaden their NRC perspective such as rotational assignments to other regions and headquarters offices. For example, Senior Resident Inspectors routinely are assigned three month rotations to the Chairman's staff. These assignments should also be considered acceptable to meet this requirement.

Recommend MC 0102 Section 04.03.d be revised as follows:

"To enhance objectivity, SRIs and resident inspectors (RIs) shall spend a minimum of one week per year performing inspection activities at another site. This may be accomplished by participating in inspection activities at another site, or during backup site familiarization visits. Long-term rotational assignments (four weeks or more) to a regional or headquarters office will also meet the intent of this requirement."

*IIPB Remarks:*

<i>Number</i>	<i>Date of form</i>	<i>Date Rcvd in IIPB</i>	<i>Comments From</i>	<i>B.C. Review</i>	<i>Topic:</i>	<i>IIPB Contact</i>	<i>Date Initial Action</i>	<i>Date Final Action</i>	<i>Format</i>	<i>Region No.</i>
<i>Region 2 Total:</i>		36	<i>Number Initially Responded:</i>			12	<i>Number Closed:</i>			3

*No. of F/B Forms:* 19      *No. of Initial Actions:* 12      *Total Closed:* 3