October 2, 2000

MEMORANDUM TO: Those on Attached List

FROM: William M. Dean, Chief, NRR ***/RA/***
Inspection Program Branch
Division of Inspection Program Management

SUBJECT: MINUTES OF CROSS CUTTING ISSUES WORK GROUP

Attached are the minutes from the second meeting of the internal cross cutting issues work group which was held on September 14, 2000. Our plans are to invite industry participation in our next meeting which will be held in the November time-frame.

Attachments: Minutes of the Cross Cutting Issues Workgroup Meeting Held on September 14, 2000

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OFC:	NRR/IIPB		NRR/IIPB		NRR/IIIPB			
NAME:	JJacobson		DHCoe		WMDean			
DATE:	9/28/00		10/2/00		10/2/00			

OFFICIAL RECORD COPY

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Region IV

John L. Pallet, Chief
Operations Branch
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Region IV

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Division of Reactor Projects
Region II

Paul E. Fredrickson, Chief
Reactor Projects Branch 6
Division of Reactor Projects
Region II

Minutes of the Cross Cutting Issues Workgroup Meeting Held on September 14, 2000

The following individuals attended the meeting:

Wayne Lanning
John Pellet
Elmo Collins
John Grobe *
Charles Casto*
Paul Fredrickson*
Jeff Jacobson
Alan Madison
William Dean
Juan Peralta
Dick Eckenrode *attended via videoconference

The meeting began with introductions and an overview of the key issues that were identified during the first meeting. IIPB then provided their observations pertaining to implementation of Inspection Procedure 71152 (Problem Identification and Resolution). These observations were based upon site visits and inspection report reviews. The following points were presented. Comments obtained during the group's discussion are in italics.

<u>IIPB presentation on implementation of IP 71152</u>

Region I - Nine inspections completed, 301 average hours per site

Region II - Three inspections completed, 203 average hours per site. *Region II indicated they have complete five inspections.*

Region III - Four inspections completed, 216 average hours per site

Region IV - Four inspections completed, 216 average hours per site. *Region Iv indicated they had actually completed seven inspections.*

Jeff Jacobson agreed to run a report which details the total (including prep and doc) hours spent during each inspection and forward the results to the workgroup members.

The inspections that included full participation by a member of the resident staff and a good mix of inspectors from various disciplines were the most effective. *The workgroup members agreed that participation from a member of the resident staff was strongly suggested to allow for effective implementation of the procedure.*

The two week inspections seemed to have been able to delve deeper into issues than those completed in one week. *The workgroup members agreed that a two week inspection was preferable; however, the inspection could be done in one week on site if additional upfront planning was performed. Discussion was also held regarding the pros and cons of inspecting two weeks in a row versus having a week off in between the two onsite weeks.*

There have been no white or greater issues identified during these inspections.

The inspection procedure is being changed to eliminate the requirements to assess collective risk and performance indicator data. *The group discussed the need to continue to qualitatively look for combinations of risk significant issues.*

Some of the initial inspections did not allow sufficient time during inspection planning for assessing what PI & R issues had already been identified. Also, some inspectors have not developed site specific inspection plans that identify how the key inspection requirements will be addressed during the inspection. As a result, the team had difficultly at the end of the inspection integrating the team's results with other PI & R data and forming conclusions regarding performance in the key PI & R areas. *Region IV discussed their approach to inspection planning which seemed to be the most comprehensive. John Pellet agreed to forward to the other regions a copy of their planning process document for their review and use.*

Some of the inspectors are spending too much time following up issues that may be violations, but have no real safety significance. *The group discussed how this may be a transitional issue and that there appears to be an improving trend in this area.*

Many licensees have increased their focus on PI & R and have conducted internal PI & R assessments prior to the team's arrival. The team's overall PI & R results have generally been comparable to the results of the licensee's internal assessments. The group discussed whether credit should be given to licensees when it is clear that they performed the assessment only because we were going to assess the area. *The general consensus was that the oversight process should encourage licensee's to find and identify problems. The group agreed that "credit" does not mean reducing the scope of the baseline inspections. Some group members believed that if the licensee can only identify issues when performing assessments in response to NRC activities, then the licensee's corrective action process can not be relied upon. Other group members believed that if the licensee's corrective action progress is really broken, issues will be identified via the baseline inspections or the PIs that will allow the NRC to engage the licensee in a timeframe that is sufficiently proactive. The group agreed to continue discussions on this topic at future meetings after acquiring additional experience with the oversight process.*

Licensee's use of direct risk data in the PI & R process to determine the extent of evaluations and to prioritize corrective actions is minimal. Most programs indirectly address risk via a general understanding of what is important at the site. *The group members agreed that most licensees have not specifically incorporated quantitative risk assessments into their corrective action process.*

<u>Regional Presentations on IP 71152</u>

Following the IIPB presentation each region gave a summary of their experience in implementing IP 71152. Among the areas covered were team size and composition, planning, scheduling, and documentation. A discussion was held regarding implementation of the inspection requirement associated with safety conscious work environment. Most group members felt that this was an important area that we should continue to assess in some manner; however, IP 71152 might not be the right vehicle for accomplishing this objective. The group members agreed to leave the requirement in the procedure for now, and to continue to discuss this issue at future meetings.

Region I suggested adding “operational occurrences” into the examples of issues that might be followed up under the PI & R procedure during baseline inspections. IIPB agreed to add these words to the procedure. Also, IIPB agreed they will assess whether the proposed changes to IMC 0610 result in better documentation of PI & R issues during baseline inspections.

Documentation Issues Related to One of the Three Cross Cutting Areas

The group discussed the current (soon to be issued) guidance on documenting issues relating to one of the three cross cutting areas, including issues that are license self identified. IIPB explained that minor issues (less than green) should not be documented. The newly proposed guidance in 0610 will allow inspectors to document in the report body and summary of findings whether a finding was related to a weakness in one of the three cross cutting areas. IF the finding was related to a weakness in the PI & R area, a reference to the finding will also be made in the PI & R section (OA4) of each baseline report. Also, if there is determined to be a trend or pattern of findings (green or greater) related to one of three cross cutting areas, a separate non colored finding will be issued and described in a separate section of the report.

IIPB agreed to develop guidance governing the documentation of licensee identified individual issues related to one of the three cross cutting areas. This guidance will be provided in the next revision of Inspection Manual Chapter 0610.

Agency Response to Identified Weaknesses In One of the Three Cross Cutting Areas

The group discussed the need for additional guidance that might allow agency action to identified weaknesses in the three cross cutting areas, before the weaknesses result in findings that would be entered into the action matrix. Included in this discussion was the definition of what would constitute a “substantial” cross cutting issue. The group was somewhat divided on this issue with some believing that no additional actions should be taken unless the issues result in findings that can be characterized by the SDP process. Others felt that the agency should engage for certain cross cutting issues, prior to the issues resulting in events of actual consequence. An example was discussed where INPO had apparently withdrawn its training program accreditation for a particular licensee. The group agreed to continue discussions in this area, in order to determine if issues exist that would question assumptions made in the oversight process, and if guidance for dealing with such issues needs to be developed.

Discussion on Proposed Supplemental Procedure for Human Performance

Dick Eckenrode discussed some of the regional comments received on the draft supplemental procedure on human performance. The group agreed the procedure should only be implemented in conjunction with supplemental inspection procedure 95002. Also, the procedure should be capable of being used for human performance issues under any of the three strategic performance areas. The group also indicated that the proposed inspection hours should be removed from the procedure as the hours are governed by IP 95002.

Plans For Next Meeting

The group discussed plans for the next meeting in the early November time frame. The group agreed it would be a good idea to hear industry’s perspective, including what INPO is doing to assess performance in the problem identification and corrective action areas. Jack Grobe also expressed interest in hearing from INPO regarding the results of their study on why INPO was unable to identify certain problem plants during their reviews. IIPB agreed to discuss in their next meeting with NEI plans for industry participation in the workgroup.

ROUTING AND TRANSMITTAL SLIP

Date: October 4, 2000

NAME	INITIALS	DATE
J. Jacobson		
D. Coe		
W. Dean		
Add to ROP internal program development web site? **If answer is "Yes," pls add TBoyce to the cc list for the document.**	**Section Chief Circle Yes/No**	

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ACTION: _____ APPROVAL: _____ FOR YOUR INFO: _____
NOTE & RETURN: _____ PREPARE REPLY: _____ COORDINATION: _____

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DUE TO NRR:
DUE TO EDO:

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MEMORANDUM TO: Wayne D. Lanning, Director, RI
Elmo E. Collins, Deputy Directo, RIV
John L. Pallet, Chief, RIV
John A. Grobe, Director, RIV
Daniel H. Dorman, Chief, NRR
Juan D. Peralta, NRR
Mary Ann Ashley, NRR
Jeffrey B. Jacobson, Senior Operations Engineer, NRR
Charles A. Casto, Deputy Director, RII
Paul E. Fredrickson, Chief, RII

FROM: William M. Dean, Chief, NRR

SUBJECT: MINUTES OF CROSS CUTTING ISSUES WORK GROUP

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REMARKS:

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ORIGINATOR: J. Jacobson PHONE: 415-2977
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