PERFORMANCE INDICATOR DATA COLLECTING AND REPORTING PROCESS REVIEW

CORNERSTONES: INITIATING EVENTS
MITIGATION SYSTEMS
EMERGENCY PREPAREDNESS
OCCUPATIONAL RADIATION SAFETY
PHYSICAL PROTECTION

APPLICABILITY: This temporary instruction (TI) applies to all holders of operating licenses for nuclear power reactors, except (1) nuclear power reactors that have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel, and (2) D.C. Cook Units 1 and 2 and Browns Ferry Unit 1 nuclear power reactors that have been shutdown for an extended period of time.

2515/144-01 OBJECTIVE

To review a licensee's performance indicator (PI) data collecting and reporting process to determine whether the licensees are appropriately implementing the NRC/Industry guidance.

2515/144-02 BACKGROUND

The revised reactor oversight process uses PI information, along with the results from its reactor inspection program, to provide the basis for NRC staff to assess plant performance and establish the appropriate regulatory response. PIs provide objective indicators of licensee safety performance in each cornerstone of safety on a periodic basis. The PI information is a basic element of the revised reactor oversight process (RROP).

The performance indicator portion of the RROP was designed to use data submitted by licensees. The effectiveness of the performance indicator portion of the RROP is contingent upon licensees providing PI data for their respective reactor facilities in accordance with the guidance contained in Nuclear Energy Institute (NEI) 99-02, Revision 0, "Regulatory Assessment Performance Indicator Guideline."

Several problems were identified during the pilot program with accurately reporting the PIs in accordance with the industry guideline document, NEI 99-02. Most of these errors were minor in nature and were largely attributed to the difficulty in collecting and reporting historical data and problems with ambiguous definitions and clarifying instructions. There were, however, some situations where errors in reporting were substantial and continued for some time due to

misinterpretation of guidance. For example, power changes that should have been included in the Unplanned Power Changes PI were not reported and fault exposure hours were not accounted for in the Safety System Unavailability PI due to misinterpretations of the guidance. As a result, many changes were made to the industry guideline document to improve the clarity of the guidance. However, a key lesson learned from the pilot program is that an effort to assure the NRC and the licensees have a common understanding of how to apply the guidance in NEI 99-02 is important.

The NRC issued two Regulatory Issue Summaries (RIS) to document the understanding between the industry, as represented by the Nuclear Energy Institute (NEI), and the NRC that all non-pilot plant licensees would voluntarily submit to the NRC in January 2000 a historical PI data submittal and that all licensees would voluntarily submit PI data on a quarterly basis beginning April 21, 2000. Each licensee voluntarily submitted their historical PI data on January 21, 2000. The January submittal included data for each indicator covering two years (1st quarter 1998 - 4th quarter 1999) or data sufficient to calculate a 4th quarter 1999 indicator value, whichever is greater. All licensees are expected to begin submitting quarterly PI data, with the first submittal due April 21, 2000.

It is recognized that in instituting this new and voluntary initiative, that reporting errors will occur. This was a lesson learned during the pilot program. The Office of Enforcement (OE) has established a policy of blanket enforcement discretion for issues related to non-willful, inaccurate PI reporting through January 31, 2001. The enforcement guidance to support the initial implementation of the RROP is provided in Enforcement Guidance Memorandum (EGM) 00-001, "Application of the Enforcement Policy in Conjunction with the Revised Reactor Oversight Process."

2515/144-03 INSPECTION REQUIREMENTS

PI Process Review

Review the licensee's PI data collecting and reporting process and determine whether the data collecting and reporting methods for current PI data are consistent with the guidance contained in NEI 99-02, Revision 0, "Regulatory Assessment Performance Indicator Guideline." To verify each licensee's PI data collecting and reporting process, review indicator definitions, data reporting elements, calculational methods, definitions of terms, and clarifying notes used by the licensees for consistency with industry guidance document NEI-99-02, for the following indicators:

1. Initiating Events - Unplanned Power Changes per 7000 Critical Hours.

2. Mitigating Systems - Any of the safety System Unavailability (SSU) Performance Indicators and Safety System Functional Failures.

3. Emergency Preparedness - Emergency Response Organization Drill Participation (ERO)

4. Occupational Radiation Safety - Occupational Exposure Control Effectiveness

5. Physical Protection - Protected Area Security Equipment Performance Index

2515/144-04 GUIDANCE

PI Process Review

The intent of this inspection effort is to review and determine whether the licensee's have a clear understanding of the indicator definitions, data reporting elements, calculational methods, definitions of terms, and clarifying notes and a process that will produce accurate performance indicators in

accordance with the guidance in NEI-99-02, Revision 0. The PIs identified for review in Section 03 were based on consideration of factors such as the recently revised indicator thresholds, revised NEI-99-02 guidance and an effort to obtain a good representation of important performance areas. The inspector may review indicator data submittal for the first quarter of CY 2000 and beyond to support the PI process review.

It is not the intent of this TI to verify the accuracy of the licensee's performance indicator data. The periodic verification of PI data accuracy is performed via inspection procedure 71151, "Performance Indicator Verification." However, the inspector may perform this PI process review in coordination with the PI verification inspection if adequate data exists at the time the TI is accomplished.

At quarterly intervals, each licensee will submit to the NRC the performance indicator data by the 21st calender day of the month following the end of the reporting quarter. The format and examples of the data are provided in NEI 99-02. The guidance provided in NEI 99-02, Revision 0, should be used in the preparation and submittal of performance indicator data for second quarter CY 2000 and beyond. Guidance contained in NEI 99-02, Draft Revision D, will typically be utilized for first quarter CY 2000 data. PI data submitted prior to the issuance of NEI 99-002, Revision 0, may be revised and resubmitted to reflect current guidance if desired by the licensee. However, revisions of previously submitted data that are the result of changes to guidance alone are not required.

While not the focus of this TI, if a PI data reporting error is discovered, an amended mid-quarter report is not required to be submitted by the licensees as long as the error would not have resulted in crossing a threshold licensee response. However, the corrected data should be submitted in the next quarterly report along with a brief description of the change(s) as described in NEI-99-02.

If the licensee does not agree on NRC's interpretation of an issue, the inspector should do the following:

1. Review the NEI-99-02 guidance on clarifying notes and frequently asked questions (FAQs) and determine whether the issue has already been addressed of if this review resolves the issue.

2. If interpretation difference still exists, this issue should be brought to the attention of the respective Division of Reactor Projects Branch Chief for resolution.

3. If the interpretation issue is not resolved before the end of the inspection, it should be identified as an Unresolved Item in the report and raised to the program office for interpretation and possible consideration for the NRC/NEI working group resolution process. The inspector should complete the attached Feedback Form and forward it to the Inspection Program Branch (IIPB), Office of Nuclear Reactor regulation (NRR) for review.

If the program office cannot resolve the above issue in a timely manner, then the issue will be entered in the FAQ process and will be resolved during an NRC/NEI public meeting.

If the inspector and the licensee agree on an interpretation for which NEI-99-02 guidance is not clear, then the inspector should also complete the attached Feedback Form and forward it to the Inspection Program Branch, NRR for review and possible consideration for the NRC/NEI working group.

If the inspector determines that the licensee's application of NEI 99-02 to its PI data collecting and reporting process resulted in a number of interpretation issues such that there are concerns that the licensee will collect of report PI data incorrectly, this should be brought to the attention of licensee and regional management.

2515/144-05 REPORTING REQUIREMENTS

Document inspection results in a routine inspection report in the "other activities" section of the inspection report. The report should describe the adequacy of data collecting and reporting process as well as any current process weaknesses that could affect accurate reporting of the PIs. Upon completion of the TI, a copy of each inspection report and an overall summary of the TI inspection results from each region should be sent to the Chief, Inspection Program Branch, NRR.

2515/144-06 COMPLETION SCHEDULE

This TI inspection has been extended and should be completed by December 29, 2000.

2515/144-07 EXPIRATION

This TI will expire January 31, 2001.

2515/144-08 CONTACT

Any questions regarding the performance of this TI should be addressed to Serita Sanders (301) 415-2956.

2515/144-09 STATISTICAL DATA REPORTING

All direct inspection effort expended on this TI is to be charged to 2515/144 for RITS reporting with an IPE code of SI.

2515/144-10 ORIGINATING ORGANIZATION INFORMATION

10.01 Organizational Responsibility. This TI was initiated by IIPB/DIPM/NRR.

10.02 Resource Estimate. The estimated direct inspection effort to perform this TI is estimated to be 24 hours.

10.03 Other. No parallel inspection procedures can be satisfied by the performance of this TI.

10.04 Training. There are no additional training requirement necessary to complete this TI because the necessary training was provided to the inspectors during the Technical Training Center sponsored course, G-200, "Reactor Inspection and Oversight Program," and various workshops. Inspectors shall familiarize themselves with the guidance contained in NEI-99-02, Revision 0.

END

Attachment

PERFORMANCE INDICATOR INTERPRETATION FEEDBACK FORM

Instructions: Fill out the form and send it to NRR/IIPB through regional DRP branch chief via E-mail to"piissues". A hard copy of the form should also be provided to Chief, Performance Assessment Section, IIPB.

1. Cornerstone:	2. PI:	3. Plant Name
A. Licensee Disagreement On NRC 's Interpretation of an Issue		
1. Description of Interpretation Issue:		
2. Licensee's Interpretation:		
3.Region's Interpretation:		
B. Licensee and NRC Agreement On Interpretation of an Issue, But the NEI-99-02 Guidance Needs Clarification or Revision		
1. Description of Interpretation Issue:		
2. Suggested Revision/Clarification to NEI-99-02 Guidance:		
3. Comment:		

Commenter Information	Name/Email:	Region/Division:
Regional Branch Chief Review	Name/Email:	Approved: Date:

Date Rcv'd	IIPB Action			IIPB Contact
	Immediate	Pending	Complete	

IIPB FINAL RESOLUTION	Approved By/Date

END