

January 4, 2001

MEMORANDUM TO: Hubert J. Miller, Regional Administrator, RI  
Luis A. Reyes, Regional Administrator, RII  
James E. Dyer, Regional Administrator, RIII  
Ellis W. Merschoff, Regional Administrator, RIV  
Samuel J. Collins, Director, NRR

THRU: Bruce A. Boger, Director */RA/*  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

FROM: William M. Dean, Chief */RA/*  
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Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF OCTOBER/NOVEMBER 2000 REACTOR OVERSIGHT  
PROCESS FEEDBACK SITE VISITS

During the months of October and November, 2000, the Inspection Program Branch (IIPB) conducted a series of site visits to each region. The purpose of the site visits, which was an integral part of IIPB's reactor oversight process (ROP) communication plan, was to both solicit and provide feedback on the ROP. IIPB staff and management visited six sites in each region where they met with both the resident inspector staff and licensee management to discuss their experiences and observations regarding implementation of the ROP. IIPB sought to identify both areas where the ROP was being successful in achieving its objectives as well as areas where current or future challenges may exist. There was general consensus on many aspects of the ROP that were considered successes relative to its implementation to-date. There were also several areas that were generally considered to require more information to make an informed judgement or which required additional effort to revise or modify the process. These are described below.

Overall, the ROP was considered to be meeting the criteria described by the Commission when they directed the staff to revise its approach to nuclear power plant oversight. The ROP was considered to be more risk-informed, objective, understandable, and predictable. This reflects the same general observations from the pilot program, which provided the basis for going forward with the initial implementation phase of the ROP. Most notably, the increased emphasis on risk-informing its process, such as the areas of emphasis in the inspection program and the application of the significance determination process, has perceptibly focused both agency and licensee resources and attention more appropriately on areas of risk and safety import.

When applying the agency's performance goals as criteria to judge the efficacy of the ROP, there were mixed views. Some NRC staff and managers are still skeptical of the ability of the

ROP to maintain safety and enhance public confidence because of its elevated thresholds for documenting issues, the inability to more firmly engage licensees on lower level issues, and the manner in which cross-cutting areas are (or are not) addressed in the ROP framework.

It was clearly recognized that the NRC is still in a startup phase relative to determining efficiency and effectiveness but inspector effort appears to be more appropriately focused on issues of safety import and resident inspectors noted that the risk-informed baseline inspection program has eliminated much of the peripheral, less important inspection activities from the previous inspection program. While many licensees have expressed that they do not see any notable reduction in overall regulatory burden associated with the ROP, they note that inspector efforts are more focused on areas important to safety, thus licensee resources are more appropriately applied to similar areas.

### Successes

The following were noted by the large majority of the inspectors and licensees as particular successes:

- The SDP focuses both inspectors and licensees on key issues and key aspects of these issues - less time and effort is spent on low level issues and the SDP enhances communication as all parties are speaking from common ground;
- Some areas that may have gotten less attention from licensees in the past are getting addressed - visibility of PIs has focused attention in some non-reactor safety areas such as safeguards equipment and emergency planning staff training.
- Public access to information on plant performance and ROP-related information is seen as a major enhancement.

### Challenges

The following were noted by the large majority of the inspectors and licensees as particular challenges:

- Varying guidance on inspection report content during the first several months of initial implementation caused some undue frustration and confusion;
- The unavailability PI is viewed as being problematic as there continues to be a large number of questions and frequent interpretation issues that have been hard to follow and thus determine applicability site-to-site;
- Inspectors noted that the inspection program may be too rigid and inflexible in certain areas - items such as sample size, estimated resources, and the program requirement to complete all inspection objectives are considered to be contributors to this concern;

- The use of no-color findings has created some confusion and misunderstanding;
- Inspectors question the value of the maintenance effectiveness inspection procedures as currently written;
- Transition to “N” resident inspector staffing highlights the need to better plan to backfill for prolonged RI absences in order to meet program objectives;
- There has been inconsistency in addressing and documenting cross-cutting issues as inspectors and regional management deal with the change inherent in the ROP and the lack of well-defined guidance.

During the site visits, IIPB staff also sought specific feedback on two issues, how well the feedback process is working and how well did the training associated with the ROP prepare inspectors for implementing the process. The feedback received in these two specific areas is summarized below.

#### Feedback Process

While there has been improved initial response to issues raised through the feedback process by IIPB, some inspectors are concerned that it is not always clear that their issues have received appropriate consideration. It was noted that feedback forms are not always being submitted when issues or questions on ROP guidance or processes arise in the field. Many times, the default method for getting feedback is verbal communications with the program office. This results in missed opportunities to capture these issues for program self-assessment.

#### Training

Initial training on the ROP (both the G-200 course and the regional workshops) was viewed as positive, however, opportunities for continued training on ROP-related topics like SDP, inspection report preparation, and specific inspection procedures were noted as being desirable.

IIPB intends to use the information gathered from these site visits to help formulate areas to focus upon as the first year of initial implementation draws to a close. My memorandum of December 15, 2000, outlined key focus group activities to support our internal lessons learned review, many of which were influenced by the feedback we received during this endeavor. The issues and feedback contained in the attached summary, which reflect more specific concerns or observations, will also be used by IIPB task area leads to help formulate improved guidance or to provide issues to be considered during future ROP improvement activities. Please contact me if you have any questions or observations.

Attachment: Specific Issues and Feedback

|     |                        |                |                   |                    |
|-----|------------------------|----------------|-------------------|--------------------|
| cc: | J. Johnson, ADIP       | B. Boger, NRR  | F. Gillespie, NRR | R.W. Borchardt, OE |
|     | R. Barrett, NRR        | T. Quay, NRR   | G. Tracy, NRR     | T. Boyce, NRR      |
|     | J. Hannon, NRR         | L. Plisco, RII | W. Lanning, RI    | A. Howell, RIV     |
|     | C. Casto, RII          | G. Grant, RIII | J. Grobe, RIII    | K. Brockman, RIV   |
|     | A. Randolph Blough, RI |                |                   |                    |

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|--------|-----------|--|----------|--|--|--|--|--|--|
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| NAME   | WMDean *  |  | BBoger * |  |  |  |  |  |  |
| DATE   | 1/03/01   |  | 1/04/01  |  |  |  |  |  |  |

## Specific Issues and Feedback

### Cross-Cutting Areas

- While there were mixed observations regarding the need to document low level issues in these areas, there is a sense that there may be programmatic weaknesses that should be captured as they may be predictors of future poor performance. Little anecdotal information was available that could provide specific examples of what should and should not be documented however.
- The ROP should allow for documenting problems in a cross-cutting area that is centered in a single cornerstone (e.g., continued I&C human errors conducting surveillances) as opposed to having to be seen in multiple cornerstones as current guidance dictates.

### Inspection Reports

- Feedback from inspectors and licensees in R-II on quarterly inspection reports was very positive.
- Inconsistencies were noted in application of guidance within and between regions, partially due to misinterpretation of guidance and also because of changing guidance from the program office.
- Licensees expressed the general view that the new IR format and content appropriately focused on pertinent safety issues, but that continued dialogue with inspectors on lower level issues and observations is necessary. Some inspectors had discomfort with sharing insights which were not captured in inspection reports.
- Inspectors would like an even crisper definition of what constitutes a minor issue- perhaps more examples to refer to or additional training beyond OE guidance is necessary - this is an issue not for relatively simple issues, but for more complex items.

### Inspection Program issues

- Scope and depth of the inspection procedures appears appropriate - both inspectors and licensees expressed this view.
- Some concerns were raised that the baseline inspection program may be more than what is needed for good performing plants.
- Some inspectors are challenged by inspection planning while others have developed effective/efficient tools - factors affecting this include inspector organizational tools, licensee internal processes, and the pace of activity at the site. This is a fertile topic for internal counterpart meetings to foster sharing of successful approaches.
- Some inspection procedures that are annualized (e.g., flooding, heat sink performance) have design aspects that only need to be reviewed one time. This should be accounted for in the procedure and perhaps the procedure should focus on addressing ongoing issues.

- There was mixed feedback on resident inspector presence in the plant - while some say it has diminished, others say it is appropriate or has even increased. Clearly there was a recognition that the ROP requires a greater degree of inspector planning and preparation.
- Some resident inspectors raised the concern that the program does not provide guidance on how to pursue issues in areas typically handled by region-based specialists inspectors. Examples given included HP and security issues.
- The PI & R inspection approach was noted by some as being somewhat limiting and perhaps greater flexibility on where to apply these hours could be provided - inspectors were making better use of the PI & R aspects of each inspectable area to follow-up on previously identified issues.

### SDP

- Lack of finalized phase 2 workbooks was noted as an issue increasing the workload on SRAs.
- The Fire Protection SDP was noted as being overly complex and difficult to implement - perhaps over conservative in its assessment of plant risk.
- Some inspectors raised the concern that some of the non-reactor safety SDPs (e.g., rad protection) appear not to be commensurate with the Reactor Safety SDP relative to thresholds of significance (i.e., too low a threshold of significance for some of the non-reactor safety SDPs).
- The Containment SDP was considered to not be “user friendly” and may be overly conservative.
- Inconsistent documentation of SDP result bases in inspection reports was noted - both on an inspector to inspector, and region to region basis.

### Performance Indicators

- The number of FAQs is overwhelming to both inspectors and licensees and issues that are raised are not always resolved or responded to in a timely manner.
- Licensees noted that by creating a Drill Participation PI it creates a defacto regulation.
- Fault exposure time associated with the unavailability PI, drives this PI to be white unnecessarily.
- Some licensees noted that the Security Equipment Performance Index PI is overly sensitive.
- There are too many different definitions of unavailability that plants have to consider (ROP, Maintenance Rule, WANO) and the definition of what constitutes a down power needs refinement.

- The threshold for the unavailability PI may encourage licensees to not conduct normally scheduled preventive maintenance to avoid crossing the threshold.

#### Assessment and Enforcement

- Much of the feedback was prefaced with the thought that it is probably too early to make any definitive judgements on the overall capability of the assessment process.
- Some licensees expressed concerns about the length of time an inspection finding remains active in the action matrix until it is no longer part of the assessment process.

#### Communication of Assessment Information

- Both licensee and regional management questioned the value of the annual site assessment meetings, particularly for plants with no notable issues.
- Some licensees expressed a concern regarding the potential to have a white PI due to reducing power for safety purposes, as opposed to a performance or equipment issue, and the public perception of that PI. Some licensees also were unclear on how the ROP addressed when there was a single performance issue that results in a white finding, but also a white unavailability PI.