

January 29, 2001

MEMORANDUM TO: Luis A. Reyes, Regional Administrator  
Region II

FROM: Samuel J. Collins, Director */RA/*  
Office of Nuclear Reactor Regulation

SUBJECT: REQUEST FOR REDUCTION IN BASELINE INSPECTION PROGRAM  
AT NORTH ANNA

In your memorandum dated December 26, 2000, you had requested that the Program Office approve a one-time reduction in the baseline inspection program to be conducted at the North Anna facility. The basis for the reduction, as stated in your memorandum, is that an International Atomic Energy Agency (IAEA) Operational Safety Review Team (OSART) had been conducted at the North Anna facility, that this inspection was conducted with sufficient depth, that the OSART inspection report will be made publicly available, and that OSART findings would be processed as performance assessment inputs equivalent to NRC findings.

As described in your letter, you were satisfied that the OSART inspection guidelines are sufficiently similar to those NRC Inspection Procedures used by our Resident Inspectors and that the inspectable areas had been examined with the same quality and depth as our own inspections. In addition, findings from the OSART were reviewed by your staff for significance and determined to be within the licensee response band. Based on the above, I agree that sufficient justification exists to reduce for one quarter one of the resident inspector observations required by the Surveillance Testing inspection procedure (71111.22) and Licensed Operator Requalification Program inspection procedures (71111.11-02). Also, the ALARA Planning and Controls inspection procedure (71121.02) review may be reduced for the next ALARA inspection at North Anna per your request.

However, the licensee's fire protection activities for which you propose to credit the IAEA OSART inspection effort are subject to more transitory changes than the above inspectable areas. The focus of subsection 02.01 of the Fire Protection inspection procedure (71111.05) is a quarterly review of the ongoing and possible changing status of plant material condition, as well as the status of fire detection and suppression systems, equipment and operational lineups. Items like transient combustibles and ignition sources may change

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frequently during the year and especially during plant outages. Because of this, relief could be granted for the quarter in which the OSART team was onsite, but would not be appropriate beyond that quarter. The above conclusions have been discussed with Loren Plisco of your staff.

Thank you for raising this issue. Your suggestion allows inspection resources to be better directed and avoids unnecessary regulatory burden on the licensee.

cc: H. Miller, RI  
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E. Merschoff, RIV  
D. Trimble, NRR  
K. Gibson, NRR  
R. Haag, RII  
K. Landis, RII  
L. Plisco, RII  
E. Weiss, NRR  
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\*See previous concurrence.

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