

January 31, 2001

MEMORANDUM FOR: Ken E. Brockman, Director
Division of Reactor Projects
Region IV

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

SUBJECT: AGENCY RESPONSE TO DEGRADED CONDITIONS AT POWER
REACTORS

Your memorandum dated September 20, 2000, enclosed a white paper on the region's review of its response to the degraded splice treatments found at Cooper Nuclear Station. This review included several recommendations for improving existing agency programs. The reviewers recommended that Management Directive (MD) 8.3, "NRC Incident Investigation Program," be modified to permit Regional Administrators to charter a Special Inspection for risk-significant degraded conditions that have not been corrected nor compensated for by the licensee. Additionally, the reviewers recommended increasing the scope of several baseline inspection procedures to permit a broader ability to conduct real-time inspection of degraded conditions.

A memorandum dated March 17, 2000, from the Director of the Incident Response Operations requested an agency-wide review of a proposed revision to MD 8.3, which resulted from NRR's effort to risk inform the agency's activation criteria for events at power reactors. Our internal reviews regarding the comparability of conditional core damage probability (CCDP) for both events and degraded conditions, as well as our discussions with your office regarding the Cooper issues, resulted in an additional revision to MD 8.3. This revision states "Significant operational power reactor events meeting the following deterministic criteria should be evaluated for risk to aid in determining the level of response, if any. These events may include significant unplanned degraded conditions identified by the licensee or NRC." MD 8.3 includes a table which lists response options for power reactor operational events/degraded conditions as a function of estimated CCDP. The response options include forming an Incident Inspection Team, Augmented Inspection Team or Special Inspection.

The MD 8.3 process provides NRC response for events and degraded conditions at power reactors regardless of whether the licensee takes corrective actions to lessen the risk, which is broader than Region IV's recommendation. MD 8.3 is based upon NRC policy that significant operational events are investigated in a timely, objective, systematic, and technically sound manner; that the factual information pertaining to each event is documented; and that the cause(s) of each event are ascertained. The MD 8.3 revision is anticipated to be issued in the very near future.

Region IV's recommendations for revising several baseline inspection procedures have been entered into the feedback process and assigned to the respective inspectable area leads for appropriate consideration during our ongoing procedure review efforts.

I would like to express our appreciation for the significant effort by Region IV in conducting this review and developing the white paper. The region's efforts have contributed to notable improvements to MD 8.3.

cc: S. Collins, NRR
H. Miller, RI
A. Blough, RI
L. Reyes, RII
L. Plisco, RII
J. Dyer, RIII
G. Grant, RIII
E. Merschoff, RIV
B. Boger, NRR
J. Johnson, NRR
C. Miller, IRO
F. Congel, IRO

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* See previous concurrence.

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