



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064**

February 15, 2001

MEMORANDUM TO: William M. Dean, Chief, Inspection Program Branch, NRR

FROM: Ken E. Brockman, Director, Division of Reactor Projects */RA/*

SUBJECT: SUBMISSION OF THE RESULTS OF THE TEMPORARY
INSTRUCTION 2515/144 INSPECTIONS

The results of completion of Temporary Instruction 2515/144, at the 12 nonpilot sites in Region IV, indicated that all licensees were generally effective in implementing the requirements of the performance indicator program. This observation is based on no findings being identified at 9 of the 12 sites. Issues were identified at the other 3 sites, which included items such as: (1) determination of unavailable time of monitored systems when a support system was not in service [Diablo Canyon, River Bend]; and (2) failure to report factual performance indicator data to the NRC [South Texas Project].

The excerpts from the applicable inspection reports that discuss the results of the inspections are attached.

If you have any questions regarding this subject, contact P. Harrell at 817-860-8250.

Attachment:
As stated

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PHHarrell;df				
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INSPECTION REPORT SECTIONS THAT DOCUMENT THE REVIEWS DONE PER TI 2515/144

ARKANSAS NUCLEAR ONE INSPECTION REPORT 2000-09

4OA5 Performance Indicator Data Collecting and Reporting Process Review

a. Inspection Scope

The inspectors reviewed the performance indicator data collecting and reporting process, as specified in Temporary Instruction 2515/144. The following performance indicators were reviewed in detail to determine if the licensee was appropriately implementing NRC and industry guidance for collecting and reporting data:

- a. Initiating Events - unplanned power changes per 7000 critical hours
- b. Mitigation Systems - high pressure injection system unavailability
- c. Emergency Preparedness - ERO drill participation
- d. Occupational Radiation Safety - occupational exposure control effectiveness
- e. Physical Protection - protected area security equipment performance

The inspectors interviewed the personnel responsible for data collection and reviewed Procedure LI-107, "NRC Performance Indicator Process," Revision 0 with respect to the indicator definitions, data reporting elements, and calculation methods for consistency with Nuclear Energy Institute Guidance Document NEI-99-02, "Regulatory Assessment Performance Indicator Guideline," dated March 28, 2000.

b. Issues and Findings

No significant findings were identified.

CALLAWAY
INSPECTION REPORT 2000-14

40A1 Performance Indicator Verification

a. Inspection Scope

The inspectors reviewed the licensee's performance indicator data collecting and reporting for selected indicators to determine whether NRC and industry guidance discussed in Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review," was appropriately implemented. The inspectors verified the following performance indicators:

- Safety system unavailability for the high pressure safety injection system
- Safety system functional failures
- Emergency response organization drill participation
- Protected area security equipment performance

b. Findings

There were no findings identified.

COLUMBIA GENERATING STATION
INSPECTION REPORT 2000-11

40A5 Other

.2 TI 2515/144, Performance Indicator Data Collecting and Reporting Process Review

a. Inspection Scope

The inspectors reviewed the licensee's performance indicator data collecting and reporting process to determine whether the licensee appropriately implemented the NRC/industry guidance. The inspectors assessed whether the licensee clearly understood the indicator definitions, data reporting elements, calculation methods, and clarifying notes and verified that the process will produce accurate performance indicators in accordance with the guidance in NEI-99-02. The inspectors reviewed the following specific performance indicators:

- Initiating Events - Unplanned Power Changes per 7000 Critical Hours
- Mitigating Systems - Residual Heat Removal System Unavailability Performance Indicators

- Emergency Preparedness - Emergency Response Organization Drill Participation
- Occupational Radiation Safety - Occupational Exposure Control Effectiveness
- Physical Protection - Protected Area Security Equipment Performance Index

b. Issues and Findings

There were no findings identified during this inspection.

COMMANCHE PEAK **INSPECTION REPORT 2000-03**

40A4 Crosscutting Issues

.1 Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review"

a. Inspection Scope

A review of the licensee's performance indicator data collection and reporting process was conducted to determine if it was consistent with the guidance developed by the Nuclear Energy Institute, as endorsed by the NRC. The following documents were reviewed during this inspection:

- Work Control Instruction WCI-701, "NRC/NEI Regulatory Assessment Performance Indicator Preparation," Revision 0
- Initiating Events Cornerstone (desktop guideline)
- Safety System Performance (desktop guideline)
- Occupational and Public Radiation Safety Cornerstone (desktop guideline)
- Physical Protection Cornerstone Protected Area Security Equipment (desktop guideline)
- Nuclear Energy Institute NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0

In cases where desktop guidelines did not exist or the guidelines were unclear as to the data collection requirements, interviews were conducted with the individuals responsible for data collection and reporting to assess the individual's understanding of the NEI 99-02 guidance and the licensee's reporting process.

b. Findings

There were no findings identified.

DIABLO CANYON
INSPECTION REPORT 2000-10

4OA2 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors reviewed the following performance indicators for the period from the first quarter of 1999 through the second quarter of 2000 to assess the accuracy and completeness of the indicator. The inspectors used NEI 99-02, "Regulatory Assessment Performance Indicator Verification," Revision 0, as guidance for this inspection.

- Residual heat removal system availability
- Auxiliary feedwater system availability
- Diesel engine generator availability
- Unplanned power changes per 7000 Critical Hours

b. Issues and Findings

Background

Sections 9.2.2 and 9.2.7 of the Final Safety Analysis Report Update discussed the normal and accident operation of the auxiliary saltwater (ASW) and component cooling water (CCW) systems. Diablo Canyon normally operated with the ASW and CCW system trains cross-tied. Either ASW pump could supply cooling to either CCW heat exchanger, and any of the three CCW pumps could supply either of the two residual heat removal heat exchangers. Section 9.2.2 of the Final Safety Analysis Report Update stated that immediately after an accident ASW and CCW trains are cross-tied, but should be split into a train specific alignment for long-term recirculation mode cooling, at the discretion of the Technical Support Center. Thus, either residual heat removal heat exchanger or pump would have cooling available postaccident with one ASW or CCW pump available.

Performance Indicator Reporting

The inspectors reviewed the licensee's performance indicator data for the residual heat removal system. The inspectors noted that the licensee tracked the unavailability of the residual heat removal trains using the Technical Specification Limiting Condition for Operation tracking sheets and completed surveillance test documentation. The licensee accurately calculated the unavailable hours of the individual residual heat removal pumps with this data.

However, the inspectors questioned this methodology of deriving the residual heat removal function unavailability. The inspectors noted that NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0, Page 33, "Support System Unavailability." stated that, if a support system causes a train to become unavailable, the hours the support system was unavailable must be counted against the monitored system. This section of NEI 99-02 also provided examples as to the application of this policy. The inspectors noted that the CCW and ASW systems provided the heat sink for the residual heat removal function. Therefore, the inspectors concluded that the licensee should consider one train of residual heat removal unavailable when either a train of CCW or ASW was unavailable and report additional unavailable hours for the residual heat removal system.

The licensee did not agree with the inspectors' reasoning. The licensee stated that they need not count any unavailability time of the residual heat removal function when an ASW pump, CCW pump, or CCW heat exchanger is inoperable. Because the licensee normally operated with both the CCW and ASW system trains cross-tied, and could cool either residual heat removal train, the licensee believed that both trains of residual heat removal were available when a train of ASW or CCW was inoperable.

The inspectors reviewed NEI 99-02, Revision 0, and had the following concerns regarding the licensee's methodology for reporting performance indicator data with respect to the residual heat removal function:

- Section 2.2 of NEI 99-02, Revision 0, page 33, line 30, specified limitations on the source of cooling water and states, in part, that "unavailable hours must be reported when both trains of a monitored system are being cooled by water provided by a single cooling water pump." The inspector considered that the intent of the residual heat removal performance indicator is to monitor the availability of the residual heat removal function and not just pump availability. Therefore, whether or not they cross-tied their systems, Diablo Canyon would only have two complete trains of the residual heat removal function with two residual heat removal pumps, two residual heat removal heat exchangers, three CCW pumps, two CCW heat exchangers, and two ASW pumps available. Otherwise, a single failure would cause a total loss of function.
- Section 2.2 of NEI 99-02, Revision 0, page 30, line 35 and page 31, line 9, indicated that, in order to credit an installed spare and not incur unavailability hours, the system must be capable of meeting the design bases requirements with one train in maintenance and a single failure of another train. This statement, although it does not directly apply, implies that, in order to incur no unavailability hours for support system unavailability, the plant must withstand a single failure in the proposed condition. Therefore, with one ASW pump inoperable, the licensee could not meet single failure criterion [without reliance on the other unit]; thus, one train of the residual heat removal function should be considered unavailable, despite the operable ASW pump's ability to cool either CCW heat exchanger.

- A draft “frequently asked question” response for another facility addressed a similar concern. The licensee referenced in this frequently asked question operated with their service water and CCW systems cross-tied during the shutdown cooling mode of residual heat removal. However, the licensee, in this other case, did not count any unavailability hours for residual heat removal when only a single service water system train was available. The draft NRC response to this question indicated that this was not an appropriate interpretation of the NEI guidance, and unavailability hours of the CCW and service water systems should be added to the monitored system’s unavailability.

Based on the recommendations quoted in NEI 99-02 and the NRC draft response to the referenced question, the inspectors concluded that the licensee should consider one train of residual heat removal unavailable when either a train of CCW or ASW was unavailable, and report additional unavailable hours for the residual heat removal system, because when either a CCW or ASW pump/heat exchanger was unavailable, there were not two complete trains of the residual heat removal function. The inspectors submitted a feedback form to the NRC’s Office of Nuclear Reactor Regulation to obtain the correct interpretation of reporting this performance indicator. Until a response to this question is received, this is an unresolved item (URI 275; 323/00010-02).

With respect to the performance indicators associated with diesel engine generator availability, auxiliary feedwater system availability, and unplanned power changes, no findings were identified during this inspection.

GRAND GULF **INSPECTION REPORT 2000-08**

4OA5 Performance Indicator Data Collecting and Reporting Process Review (TI 2515/144)

a. Inspection Scope

The inspectors reviewed the licensee's process for the collection and reporting of performance indicator data. The following performance indicators were reviewed to determine if the licensee was appropriately implementing NRC and industry guidance for collecting and reporting data:

- Initiating Events - Unplanned Power Changes per 7000 Critical Hours
- Mitigation Systems - High Pressure Injection System Unavailability
- Occupational Radiation Safety - Occupational Exposure Control Effectiveness
- Physical Protection - Protected Area Security Equipment Performance

The inspectors reviewed Procedure LI-107, "NRC Performance Indicator Process," Revision 0, with respect to the indicator definitions, data reporting elements, and calculation methods for consistency with Nuclear Energy Institute Guidance Document

NEI-99-02, "Regulatory Assessment Performance Indicator Guideline," dated March 28, 2000.

b. Findings

No findings were identified.

PALO VERDE
INSPECTION REPORT 2000-07

40A5 Other

.1 Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review"

a. Inspection Scope

A review of the licensee's performance indicator data collection and reporting process was conducted to determine if it was consistent with Nuclear Energy Institute NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0, as endorsed by the NRC. The following documents were reviewed during this inspection:

- 93DP-0LC09 "Collection and Submittal of NRC Performance Indicators," Revision 0
- 73DP-9PP01 "Thermal Performance Monitoring and Evaluation Process," Revision 2
- 93DP-0LC10 "Performance Indicator Data Mitigating Systems (SSFF) Cornerstone," Revision 0
- 40DP-9LC01 "Operations Department Performance Indicators," Revision 0
- 75RP-0LC01 "Performance Indicator Instruction Guideline Occupational Radiation Safety Cornerstone," Revision 0
- 74DP-0LC02 "Public Radiation Safety Performance Indicator," Revision 0
- 93DP-0LC11 "Performance Indicator Data Physical Protection (Reports) Cornerstone," Revision 0
- 20DP-0SK90 "Performance Indicator Physical Protection (Equipment) Cornerstone," Revision 1
- 74DP-0LC01 "RCS Activity Performance Indicator," Revision 0

- 16DP-0EP19 "Performance Indicator Emergency Preparedness Cornerstone,"
Revision 0

Interviews were conducted with several of the individuals responsible for data collection and reporting to assess the individuals' understanding of NEI 99-02 and the licensee's reporting process.

b. Issues and Findings

There were no findings identified during this inspection.

RIVER BEND **INSPECTION REPORT 2000-11**

40A1 Performance Indicator Verification

a. Inspection Scope

The inspectors used NRC Inspection Manual Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review," to verify that the licensee properly implemented NRC and industry guidance for performance indicator data collecting and reporting. In addition, the inspectors used NRC Inspection Manual Procedure 71151, "Performance Indicator Verification," to verify the accuracy and completeness of data associated with the safety system unavailability performance indicator (emergency ac power system and HPCS system), unplanned scrams per 7,000 critical hours, and scrams with a loss of normal heat removal for the period of January 1 through June 30, 2000.

b. Findings

The inspectors determined that the licensee understood the indicator definitions, data reporting elements, and calculational methods for performance indicators involving unplanned power changes per 7,000 critical hours, emergency response organization drill participation, occupational exposure control effectiveness, and protected area security equipment. Additionally, no findings were identified with the accuracy and completeness of performance indicator data associated with unplanned scrams per 7,000 critical hours and scrams with a loss of normal heat removal.

Safety System Unavailability Data Collection

Section 2.2 of Revision 0 to Nuclear Energy Institute (NEI) 99-02, "Regulatory Assessment Performance Indicator Guideline," specified that if the unavailability of a support system causes a train to be unavailable, then the hours the support system was unavailable are counted against the train as either planned or unplanned unavailability hours. Draft Revisions C and D of NEI 99-02 specified that safety system unavailability

data reported as part of the World Association of Nuclear Operators (WANO) performance indicators may be used in the January 2000 report without modification beyond correction of known reporting errors. Engineering personnel stated that the licensee used the data collected for the WANO performance indicators in their January 2000 submittal to the NRC.

In April 2000, during a review of the safety system unavailability performance indicators, the inspectors identified that the data reported by the licensee did not include the unavailability of support systems for some monitored systems. For example, when a standby service water (SWP) pump was removed from service, the licensee did not include the unavailability time of the SWP system in the unavailability of the RHR, EDG, RCIC, and HPCS systems. Additionally, not all periods in which unit coolers for monitored systems were removed from service were counted as unavailable hours. The inspectors questioned the licensee on the validity of the performance indicator data and determined that engineering personnel were not aware that the WANO performance indicator data erroneously did not include support system unavailability.

The inspectors determined that quality assurance personnel had completed two surveillances of performance indicator data. Surveillance Reports 20001002 and 20004001 each documented that performance indicator data submitted to the NRC for mitigating systems was in conformance with NEI 99-02. The inspectors determined that quality assurance personnel missed two opportunities to identify the omission of support system unavailability in the performance indicator data submitted to the NRC.

Because support system unavailability was not properly accounted for in the performance indicator data, the inspectors determined that the licensee did not have a clear understanding of the data reporting elements and indicator definitions for safety system unavailability. The licensee initiated CR 2000-1213 to resolve the issue.

The inspectors determined that the licensee credited the use of the alternate decay heat removal system as a method of RHR when either or both of the Technical Specifications required RHR trains were removed from service. When the alternate decay heat removal system was used in place of the RHR system, the licensee recorded the entire duration as unavailable hours for both trains of the RHR system. The licensee did not collect or report data on the availability/unavailability of the alternate decay heat removal system. At the end of the inspection period, the licensee was evaluating whether or not the alternate decay heat removal system should be credited when the system is used in place of the RHR system. The determination on the tracking of unavailable hours for periods when the alternate decay heat removal system is used in place of the RHR system is an unresolved item pending further review by NRC personnel (URI 50-458/0011-05).

Effect of Support System Unavailability on Performance Indicators

Section 9.2.7 of the USAR specified that the SWP system consists of four 50 percent capacity pumps. Two pumps are provided in each redundant supply header. One SWP pump is capable of meeting the cooling requirements of all equipment with the exception

of a RHR heat exchanger. The RHR heat exchangers are not required during the initial phase of an event and are manually aligned to the suppression pool cooling mode after approximately 30 minutes. Only one train of RHR is required to provide adequate cooling to the suppression pool. The two redundant divisions of SWP also merge to supply a single component in two locations, the HPCS diesel generator jacket water cooler and the HPCS pump room unit cooler.

In June 2000, the licensee stated that removal of one SWP pump from service resulted in the unavailability of divisional loads supplied by the affected train of SWP and the HPCS components. Specifically, with one of the two divisional SWP pumps removed from service and a single failure resulting in a loss of the redundant division, only one 50 percent SWP pump would be available to supply cooling water to essential equipment following a plant event. A single SWP pump was not capable of meeting all the safety functions of the SWP system.

The licensee reanalyzed the data for the fourth quarter of 1999 and the first quarter of 2000 and determined that the inclusion of support system unavailability increased the total number of unavailable hours for the monitored systems. The licensee also identified instances where unavailability hours should not have been reported. For example, the licensee had not excluded planned overhaul maintenance completed on-line from the unavailable hours reported to the NRC. Nevertheless, the licensee determined that the resultant increase in hours did not cross the threshold for changing any of the safety system unavailability performance indicators from GREEN to WHITE.

The inspectors reviewed the limiting condition for operation tracking log for the SWP system between November 1, 1997, and April 1, 2000. Using the licensee's revised methodology, the inspectors determined that had a full 12 quarter review been completed, the HPCS performance indicator would have changed from GREEN to WHITE. Therefore, the inspectors questioned engineering personnel to determine if a full 12 quarter review would be performed given the known reporting error in the WANO data.

In July 2000, the licensee reevaluated the effect of the removal of a SWP pump from service and determined the following:

- With one SWP pump removed from service, only the affected train of RHR would incur unavailability hours. Specifically, the licensee determined that the remaining SWP pump in the affected train would not be able to supply water to the RHR heat exchanger to support suppression pool cooling 30 minutes following an event. Additionally, the licensee stated that the redundant train of RHR, which would have two available SWP pumps, could be aligned to the suppression pool.
- HPCS components would not be unavailable with one SWP pump removed from service. Specifically, the redundant train of SWP would have two SWP pumps in service and could provide cooling water flow to HPCS components. Additionally,

one SWP was capable of supplying cooling water to all components with the exception of the RHR heat exchanger which required a manual alignment by operations personnel.

- The licensee determined that the 12 quarters of WANO data submitted to the NRC would not be reevaluated. The licensee determined that performance indicator data was not readily accessible to complete a 12 quarter review and decided to revise the submittal to the NRC to include a revision of data beginning on January 1, 1999. Specifically, the data was not easily retrievable from the main control room logs and the licensee had not consistently documented the effect of removing a support system from service on the monitored system. Additionally, fault exposure hours were to be included starting the fourth quarter of 1999.
- The licensee submitted a frequently asked question, dated July 11, 2000, to have NEI evaluate the affect on monitored system unavailability when one of four 50 percent SWP pumps was unavailable.

The inspectors reviewed NEI 99-02 Revision 0 and had the following concerns regarding the licensee's methodology for reporting performance indicator data:

- Section 2.2 of NEI 99-02, Revision 0, Page 33, Line 30, specified limitations on the source of cooling water. Specifically, unavailable hours for emergency generators need not be reported when cooling water provided by a pump powered from another class 1E power source can be substituted, provided that a pump will maintain electrical redundancy requirements such that a single failure cannot cause a loss of both emergency generators.

For River Bend Station, Division I SWP Pump A is supplied power from the Division I EDG, while Division I SWP Pump C is supplied power from the Division III (HPCS) EDG. Division II SWP Pumps B and D are supplied power from the Division II EDG. Assuming the removal of a single SWP pump for maintenance and a single failure which results in a loss of a separate Division of SWP (3 of 4 SWPs pumps not available), the remaining SWP would not be capable of supplying adequate cooling to support all of the monitored systems. Due to the unique design considerations for the River Bend Station, the inspectors determined that the licensee may need to report the unavailability of one SWP pump as unavailable hours for monitored systems supplied by the SWP system.

- Section 2.2 of NEI 99-02, Revision 0, Page 30, Line 35 and Page 31, Line 9, indicated that in order to credit an installed spare and not incur unavailability hours, the system must be capable of meeting the design bases requirements with one train in maintenance and a single failure of another train. Once again, due to the unique design considerations at the River Bend Station, the SWP system could not withstand a design bases accident with one SWP pump in maintenance and a single failure affecting the opposite train. Therefore, the

inspectors determined that the licensee may need to report the unavailability of one SWP pump as unavailable hours for monitored systems supplied by the SWP system.

- The inspectors determined that the licensee only revised 6 quarters of data as a result of not including support system unavailability in the WANO data. Because the original submittal was made using WANO data, the inspectors believed that the known reporting error should be corrected by completing a full 12 quarter review. The inspectors determined that the information was readily available in that the limiting condition for operation tracking log and tagging log were kept in a computer database. The databases reflected periods in which monitored and supporting systems were removed from service. Therefore access to the corresponding hand written control room log entries appeared manageable.

The inspectors considered the adequacy of the licensee's data reporting methods for safety system unavailability an unresolved item pending a review by NRC personnel on the applicability of unavailable hours of monitored systems due to one of four 50 percent SWP pumps being removed from service (URI 50-458/0011-06).

The adequacy of the resubmitted data which only utilized revised information from January 1, 1999, in lieu of a full 12 quarters, was considered an unresolved item pending a review by NRC personnel (URI 50-458/0011-07).

SONGS **INSPECTION REPORT 2000-07**

40A5 Other

.1 Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review."

a. Inspection Scope

The inspectors reviewed the licensee's data collecting and reporting process for the following performance indicators:

- IE3, Unplanned Power Changes per 7000 Critical Hours
- MS1, Emergency AC Power System Unavailability
- EP2, Emergency Response Organization Drill Participation
- OR1, Occupational Exposure Control Effectiveness
- PP1, Protected Area Security Equipment Performance Index

b. Findings

For each of the performance indicators, the inspectors determined that the data collecting and reporting process was consistent with the guidance provided in NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0, and in the Frequently Asked Questions posted as of June 12, 2000.

There were no findings identified during this inspection.

SOUTH TEXAS PROJECT **INSPECTION REPORT 2000-12**

40A1 Performance Indicator Verifications

.1 Performance Indicator Data Collecting and Reporting Process Review (Temporary Instruction 2515/144)

a. Inspection Scope

The inspectors reviewed the licensee's performance indicator (PI) program to determine whether the licensee was appropriately implementing the guidance contained in Nuclear Energy Institute (NEI) 99-02, Revision 0, "Regulatory Assessment Performance Indicator Guidelines." In accordance with Temporary Instruction 2515/144, the inspectors reviewed the licensee's data collection and reporting for the following indicators:

- Initiating Events - Unplanned power changes per 7000 critical hours
- Mitigating Systems - Safety system unavailability for high pressure safety injection, auxiliary feedwater, emergency a.c. power, and residual heat removal, as well as safety system functional failures
- Emergency Preparedness - Emergency response organization drill participation
- Occupational Radiation Safety - Occupational exposure control effectiveness
- Physical Protection - Protected area security equipment performance index

The inspectors reviewed the following station procedures and discussed the implementation of the process with key personnel:

- OPGP05-ZN-0007, Revision 0, "Preparation and Submittal of NRC Performance Indicators"

a. OPGP05-ZV-0013, Revision 0, "Performance Indicator Tracking Guide"

- Performance Indicator Instruction Guideline Initiating Events Cornerstone, Revision 0
- Performance Indicator Instruction Guideline Mitigating Systems Cornerstone Safety Systems Unavailability, Revision 0
- Performance Indicator Instruction Guideline Mitigating Systems Cornerstone Safety Systems Functional Failures, Revision 0
- Desktop Instruction for Calculating Security Equipment Performance Indicator Data, Revision 0
- Radiation Protection Department Conduct of Operations, Chapter 9, "Condition Reporting," Revision 0

b. Findings

The licensee's performance indicator reporting program generally complied with the NEI 99-02 guidance. The inspectors determined that the licensee's procedures for implementing the performance indicator reporting requirements were generally good. Desktop instructions for each indicator provided adequate instructions for data collection, calculation, and review before reporting the results to the NRC. However, many of these desktop instructions did not incorporate information from applicable frequently asked questions.

The licensee was attempting to take a conservative approach to reporting performance indicator data. The inspectors identified that some NEI 99-02 guidance that was intended to avoid reporting certain types of safety system unavailability were not incorporated in the licensee's program. This practice impacted two areas: overhaul hours and redundant maintenance trains. The licensee had performed some on line maintenance that met the definition of overhaul, but this time was not being deducted from planned unavailability as specified in NEI 99-02. In addition, the plants' unique multitrain design was not evaluated to determine if one train of certain monitored systems could be considered to be a redundant maintenance train and thus preclude counting most of the planned unavailability time. By unnecessarily reporting these safety system unavailability times, a potential existed to cause this indicator to change color and require increased regulatory action when this was not intended.

The inspectors also identified that the licensee was using safety system unavailability data from their on line Risk Assessment Calculator program (RAsCal). However, the licensee had not reviewed the RAsCal user instructions to ensure that the data recording instructions complied with NEI 99-02 guidance. Condition Report 00-17218 was written to evaluate any differences in the respective criteria.

Residual Heat Removal Function Not Properly Monitored

The inspectors identified that the licensee's PI program did not properly monitor or report safety system unavailability for the residual heat removal (RHR) function. NEI 99-02 specified that this performance indicator monitored two functions, postaccident recirculation and shutdown cooling. At South Texas Project, the former function was performed by the low pressure safety injection system and the latter function was performed by the RHR system. The inspectors determined that the licensee was reporting only the unavailability of the RHR system, so the recirculation function was not being monitored or reported. As a result of this finding, the licensee planned to amend their monitoring practices and submit corrected PI data. This issue was being tracked in the licensee's corrective action program under Condition Report 00-16019.

Failure to report accurate performance indicator data was a violation of 10 CFR 50.9. This will be tracked as an unresolved item pending the licensee completing a recalculation of this PI and inspector review to determine the significance of the incorrect information (URI 498/499;200012-02).

WATERFORD **INSPECTION REPORT 2000-12**

40A1 Performance Indicator Verification (71151)

.6 TI 2515/144 - Performance Indicator Data Collecting and Reporting Process Review

a. Inspection Scope

The inspectors reviewed the licensee's performance indicator data collecting and reporting process to determine whether the licensee appropriately implemented the NRC/industry guidance. The inspectors assessed whether the licensee clearly understood the indicator definitions, data reporting elements, calculation methods, and clarifying notes and verified that the process will produce accurate performance indicators in accordance with the guidance in NEI-99-02. The inspectors reviewed the following specific performance indicators:

- Initiating Events - Unplanned Power Changes per 7000 Critical Hours
- Mitigating Systems - Residual Heat Removal System Unavailability Performance Indicators
- Emergency Preparedness - Emergency Response Organization Drill Participation
- Occupational Radiation Safety - Occupational Exposure Control Effectiveness
- Physical Protection - Protected Area Security Equipment Performance Index

b. Findings

No findings of significance were identified.

WOLF CREEK
INSPECTION REPORT 2000-06

4OA5 Other

.1 Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process Review"

a. Inspection Scope

The inspectors conducted a review of the licensee's performance indicator data collection and reporting process to determine if it was consistent with the guidance developed by the Nuclear Energy Institute, as endorsed by the NRC. The following documents were reviewed during this inspection:

- Wolf Creek Procedure AP 26A-007, "NRC Performance Indicators"
- Performance indicator data summary Report Q1/2000
- Emergency planning performance indicators
- Wolf Creek Nuclear Operating Company emergency response personnel duty roster
- Wolf Creek Nuclear Operating Company 1999 validation program, NRC performance indicators
- Nuclear Energy Institute NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 0

In cases where procedures or guidelines did not exist, or that the data collection requirements were unclear, interviews were conducted with the individuals responsible for data collection and reporting to assess the individual's understanding of the NEI 99-02 guidance and the licensee's reporting process.

b. Findings

The inspectors did not identify any findings.