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NRC Inspection Manual IPB

Inspection Procedure 95003

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Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input

Program Applicability: 2515

Cornerstones: All

Inspection Basis: The NRC's revised inspection program includes three parts: baseline inspections; generic safety issues and special inspections; and supplemental inspections performed as a result of risk significant performance issues. The inspection program is designed to apply NRC inspection assets in an increasing manner when risk significant performance issues are identified, either by inspection findings evaluated using the significance determination process (SDP) or when performance indicator thresholds are exceeded. Accordingly, following the identification of an inspection finding categorized as risk significant (i.e., white, yellow, or red) via Table 2 of the SDP, or when a performance indicator exceeds the "licensee response band" threshold, the NRC regional office will perform supplemental inspection(s). The scope and breadth of these inspections will be based upon the guidance provided in the NRC's "Assessment Action Matrix" and the Supplemental Inspection Selection Table (included in 2515 Appendix B).

This procedure provides the supplemental response for repetitive degraded cornerstones, multiple degraded cornerstones, multiple yellow inputs, or one red input to the Assessment Action Matrix. The intent of this procedure is to provide the NRC with supplemental information regarding licensee performance, as necessary to determine the breadth and depth of safety, organizational, and programmatic issues. As such, this procedure is more diagnostic than indicative, and includes reviews of programs and processes not inspected as part of the baseline inspection program. While the procedure does allow for focus to be applied to areas where performance issues have been previously identified, the procedure does require that some sample reviews be performed for all key attributes of the effected strategic performance areas. The rationale behind this is that additional NRC assurance is required to ensure public health and safety, beyond that provided by the baseline inspection program and the performance indicators at those facilities where significant performance

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issues have been identified. The results of this inspection will aid the NRC in deciding whether additional regulatory actions are necessary to assure public health and safety. These additional regulatory actions could include orders, confirmatory action letters, or additional supplemental inspections, as necessary to confirm that corrective actions to the identified performance concerns have been effective.

This procedure was developed with consideration of the following boundary conditions:

- the NRC is performing the inspection;
- the procedure is not intended to be used for event response;
- new issues identified by the team will be evaluated using the significance determination process during the course of the inspection; other process issues will be documented in the inspection report; and,
- the procedure is intended to provide insight into the root and contributing causes of performance deficiencies, but is not intended to be a substitute for a more focused root cause analysis (or self assessment) of specific performance issues to be performed by the licensee or by a third party.

95003-01 Inspection Objectives

01.01

To provide the NRC additional information to be used in deciding whether the continued operation of the facility is acceptable and whether additional regulatory actions are necessary to arrest declining plant performance.

01.02

To provide an independent assessment of the extent of risk significant issues to aid in the determination of whether an unacceptable margin of safety exists.

01.03

To independently assess the adequacy of the programs and processes used by the licensee to identify, evaluate, and correct performance issues.

01.04

To independently evaluate the adequacy of programs and processes in the affected strategic performance areas.

01.05

To provide insight into the overall root and contributing causes of identified performance deficiencies.

01.06

To determine if the NRC oversight process provided sufficient warning to significant reductions in safety.

95003-02 Inspection Requirements

The intent of this procedure is to allow the NRC to obtain a comprehensive understanding of the depth and breadth of safety, organizational, and performance issues at facilities where data indicates the potential for serious performance degradation. The procedure is not intended to duplicate the scope of previously performed baseline and supplemental inspections; however, some repetition may be necessary where previous inspections were not sufficient to fully scope the breadth and depth of licensee performance issues. Considerable leeway has been built into the procedure to allow it to be customized, to better reflect the specific nature of the previously identified performance issues.

02.01 Strategic Performance Area(s) Identification

- a. Using the information contained in the Assessment Action Matrix, identify the strategic performance areas for which performance has significantly declined (e.g. Reactor Safety, Radiation Safety, or Safeguards). The scope of this inspection will generally include all