

TO: Jack Grobe, DRS
FROM: Mike Parker, SRA
SUBJECT: Quad Cities OSRE

- Appropriateness of the use of the Reactor Oversight Process for Quad Cities OSRE findings.

Perry and Quad Cities inspections were conducted after April 2nd, therefore, NRR believes that it is appropriate to utilize the new oversight process. However, they were conducted after April 2nd due to scheduling conflicts.

Quad was the last facility to be evaluated under the first round of OSRE activities. We should be taking the same approach that we took for other licensees in the first round.

Quad was informed that we would not evaluate them utilizing the new oversight process but would screen findings as case studies using the PP SDP.

This approach if taken would effectively tie the OSRE to the new regulatory process.

- Appropriateness of the use of the Rx SDP to integrate security findings.

Rx SDP is not used to evaluate Operator Requalification findings.

Rx SDP is not utilized to evaluate Emergency Preparedness issues.

Too much uncertainty associated with security force on force exercises:

Is the equipment truly lost?

Is the equipment recoverable?

If lost how did it fail, did it create a hot short, ground short, smart short?

What was the extent of damage (what other equipment was effected)?

It would be more appropriate to use the Rx SDP to characterize finding verses coloring finding, that is modify the PP SDP to consider remaining mitigating equipment verses integrating Rx SDP into process.

The OSRE assumes a complete loss of offsite power (LOOP) as the adversaries are assumed to have taken out all offsite power prior to the exercise. In addition all equipment that is inoperable or out of service for maintenance or surveillance during the conduct of the exercise is considered unavailable to mitigate accident conditions. The LOOP and out of service equipment does not in itself represent a performance deficiency; however, its impact on plant risk is assessed. Therefore, OSRE findings in combination with a LOOP and any mitigating equipment out of service will result in an overall higher risk significance than the Rx SDP finding for an actual plant performance deficiency for the same

B/1