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**From:** James Creed *RJC*  
**To:** Dick Rosano *NRK*  
**Date:** Fri, Sep 29, 2000 10:58 AM  
**Subject:** QC Color definitions

Yesterday you asked my help in working on the definition of the interim guidance "YELLOW" that is in the Quad Cities OSRE letter. I started to work on defining "fundamental design deficiency."

It appeared to me that evaluating the design of a strategy may not really what we are trying to do. It seems we should be focusing on the licensee's performance as the thing to evaluate, with the "design" being a potential contributor to problems. So, I took a shot at refocusing the definitions, closer to the ROP mainstream. Please see the attached.

To comply with your original request, I would offer the following as a definition of "fundamental design deficiency," as it relates to the defensive strategy only. The repeatable, identifiable inability to insure that: (1) an adequate number of personnel, (2) responding in a timely manner, (3) appropriately armed and equipped, (4) to protected positions such that all elements of any target set could be destroyed.

Loosing a target set is more than a Green finding because NRC should at least review the licensee's evaluation of their performance (Action Matrix).

Creed

**CC:** Boss, Glenn Tracy, SGOnly

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Suggestions by Creed, September 29, 2000.

**GREEN** - A finding in which the licensee has failed to adequately perform a limited portion of their protective strategy or meet security response requirements that is of very low safety significance. The performance failure is isolated in nature, the cause of which is apparent and which appears to be easily correctable. If any protected portion of a target set is lost as a direct result of this type of finding, it must be apparent that the failure was unique to the specific person or action observed. This type of deficiency is generally unique to the evaluation, not predictable and usually not repeatable.

**WHITE** - A finding in which the licensee has failed to adequately perform more than one portion of the protective strategy, or consistently and predictably failed to perform single portions of the protective strategy or meet security response requirements that is of low to moderate safety significance. The performance failure(s) is not isolated in nature or which exacerbates the significance of other findings, or the cause or significance of which is unclear. If any protected portion of a target set is lost as a direct result of this type of finding, the causes may be related to evaluation inconsistencies or readily correctable design or implementation failures. This deficiency is not unique to the observation, potentially predictable, occasionally repeatable but not indicative of major uncorrectable flaws.

**YELLOW** - A finding in which the licensee has failed to adequately perform multiple portions of their protective strategy that are of substantial safety significance. The performance failures are repeatable, predictable and relate to some fundamental protective strategy elements. The result of these performance failures is the simulated loss of at least one complete target set. The failures are not the result of evaluation errors, but demonstrate significant single or multiple strategy implementation failures or design deficiencies. These deficiencies are not unique to the observation, generally predictable, clearly repeatable and are indicative of flaws not easily correctable or for which the cause is not clear.

**RED** - A finding in which the licensee has repeatedly failed to adequately perform multiple fundamental portions of their protective strategy that are of high safety significance and demonstrate a significant reduction in safety margin. The performance failures are fundamental, predictable and related to multiple protective strategy elements. The result of these performance failures is the repeated simulated loss of multiple target sets. The performance failures are not the result of evaluation errors but demonstrate broad implementation failures. These deficiencies are not unique to the observation, consistently predictable, actually repeated and are indicative of significant flaws for which corrective action is not identified or for which the cause is unknown.