

From: David Silk, *RI*
To: Richard Conte
Date: Thu, Mar 23, 2000 10:56 AM
Subject: IP2 EP "Followup" Inspection

After discussing with Nancy the idea of taking a look at the EP changes next week at IP2, we concluded that it would be of little value due to the following reasons:

1. It would only be a paper chase. Looking at new procedures and training will not determine the effectiveness of such measures. We need a performance based assessment tool to determine the effectiveness of the changes. We don't want to provide a **"false positive"** by blessing their efforts based on documentation review. Assessing administrative aspects of the program does not address performance capability.
2. The accuracy of our conclusions at this time would be highly questionable because of the state of flux that currently exists at IP2. Reviewing "knee-jerk" corrective actions while other changes and assessments are still pending does not lend itself to a quality evaluation of the integrated status of the EP program.
3. Based upon our discussion yesterday with Frank Inzirillo, I don't believe he can support an inspection based upon their efforts to assess and correct issues from the SGTR event (let alone the 9/22/99 exercise). He even alluded to the idea that we delay the tentatively planned inspection date of 5/22/00 due to his current activities.
4. Observing an accountability and call-in drill has some merit. However, there would be no need to send us to observe since the residents should be able to handle that.

On February 7th, just eight days prior to the event, IP2 representatives came to the region and discussed their changes and indicated that the program was headed in the right direction. However, their response to the SGTR event did not correlate with the positive picture that they presented here at the region. The problems that occurred from the event response clearly demonstrated their lack of ability to thoroughly self-assess the various aspects of the EP program. We have no reason to conclude that the quality of their self assessments has improved since the event. The fact that they brought in a panel of EP experts to review their program indicates that they don't know how to assess themselves in the area of EP. The best findings (performance based) that we have developed in the EP area have come from exercise and event performances. Looking at procedure changes and training does not guarantee that the ERO will properly implement the plan to protect public health and safety. If you want to ascertain the current status of the EP program at IP2, the best way would be through an unannounced exercise evaluation.

CC: Brian Holian, Lawrence Doerflein, Nancy McNamara...

A/14