

From: Geoffrey Grant *RTH*
To: Christine Lipa *RTH*
Date: 12/7/01 4:36PM
Subject: Re: Inspections of Davis-Besse's commitments

See if DRS OL can look at the simulator training - the dedicated operator will have no other duties? Is NRR OK with this approach? Was it their understanding or did they think there would be an additional operator?

>>> Christine Lipa 12/07/01 03:16PM >>>

We (DRS, SRI, & I) have reviewed the commitments in Davis-Besse's 11/30/01 letter. We suggest the following approach to inspecting Davis-Besse's commitments. As you indicated, these will need to be verified initially and then some ongoing.

1. Checking implementation of commitments - Residents would need to do most of this. NRR could track the time line and due dates for submittals.

2. Changing operating temp - This would be considered a non-routine evolution (71111.14). The module is actually "Personnel Performance in Non-routine Evolutions." Since this operating mode will require an additional analysis by Framatome (currently ongoing), the operations department has already expressed concern with operating outside the "normal" parameters. This will also most likely require temporary procedures, and an analysis of emergency procedures as well. I would fully expect simulator training to be included in this evolution.

3. Protection of mitigating equipment - The residents would use on-line risk assessment module (71111.13). The licensee plans to minimize on-line maintenance and testing of the 6 key systems/functions listed in the letter that can be deferred until shutdown. The wording of the commitment is such that they could remove a system from service as needed for critical maintenance. This is appropriate. Inspection of this falls mostly under the module, with the additional twist of assessing whether any maintenance that may be performed was really "critical." Also, maintenance rule inspections (71111.12Q) may be focussed to assure appropriate efforts are being expended to maintain these systems.

4. Dedicated operator - Plant Status is the best way to check on this operator and his understanding of the task. This is not an additional operator, but taking one of the non-licensed operators already on the crew and briefing him for the contingency (initiation of low pressure recirculation). Could also fall under training, workarounds, and non-routine evolutions.

5. Simulator training on rod ejection accident - Residents could use Operator licensing module (71111.11), but it only "allows" three hours of inspection per quarter. Could also use the non-routine evolution module (71111.14), since the hours are much more liberal, and the module would allow more inspector discretion on activities.

6. Commitments on specific inspections to be performed (visual and NDE) - DRS has a TI that they will use and spend between 1-2 wks of inspection effort per the TI. The residents would use Plant Status to stay informed of the schedule/progress/findings of the visual and NDE inspections.

7. New outage date of 2/16/02 - Plant Status.

CC: Christopher Thomas; Douglas Simpkins; Laura Collins; Steven Reynolds

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