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PLANS FOR ADDRESSING THE DAVIS-BESSE LESSONS LEARNED TASK FORCE RECOMMENDATIONS

INSPECTION PROGRAMS

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Inspection Program Action Plan

Part I Problem Identification and Resolution Guidance

Part II IMC 0350 Guidance

Part III Project Management Guidance

LLTF Report Recommendations Included in This Action Plan

RECOMMENDATION NUMBER	RECOMMENDATION	Priority
3.2.5.(2)	The NRC should revise its inspection guidance to provide assessments of: (1) the safety implications of long-standing, unresolved problems; (2) corrective actions phased in over several years or refueling outages; and (3) deferred modifications.	High
3.3.2.(2)	The NRC should revise the overall PI&R inspection approach such that issues similar to those experienced at DBNPS are reviewed and assessed. The NRC should enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed.	Low
3.3.2.(3)	The NRC should provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews [3.3.2.(3)]	Low
3.3.2.(4)	The NRC should revise its inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding.	Low
3.3.5.(4)	The NRC should develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation.	High
3.3.7.(2)	The NRC should establish guidance to ensure that decisions to allow deviations from agency guidelines and recommendations issued in generic communications are adequately documented.	High

LLTF Low and Medium Items To Be Addressed In PBPM Process

RECOMMENDATION NUMBER	*RECOMMENDATION*	Priority
3.1.2(3)	*Establish process guidance to ensure that generic requirements or guidance are not inappropriately affected when making unrelated changes to processes, guidance, etc. (e.g., deleting inspection procedures that were developed in response to a generic issue).*	Low
3.3.4(7)	*Reassess the basis for the cancellation of the inspection procedures that were deleted by Inspection Manual Chapter, Change Notice 01-017 to determine whether there are deleted inspection procedures that have continuing applicability. Reactivate such procedures, as appropriate.*	Low
APP. F	*Conduct an effectiveness review of the actions taken in response to past lessons-learned reviews.*	Medium
3.3.4(5)	*Review the range of NRC baseline inspections and plant assessment processes, as well as other NRC programs, to determine whether sufficient programs and processes are in place to identify and appropriately disposition the types of problems experienced at DBNPS. Additionally, provide more structured and focused inspections to assess licensee employee concerns programs and safety conscious work environment.*	Medium
3.2.5(1)	*Develop inspection guidance to assess scheduler influences on outage work scope.*	Medium
3.3.1(2)	*Develop inspection guidance to assess repetitive or multiple TS action statement entries, as well as, the radiation dose implications associated with repetitive tasks.*	Medium
3.3.3(1)	*As an additional level of assurance, identify alternative mechanisms to independently assess plant performance as a means of self-assessing NRC processes. Once identified, the feasibility of such mechanisms should be determined.*	Medium
3.3.4(1)	*Review inspection guidance pertaining to refueling outage activities to determine whether the level of inspection effort and guidance are sufficient given the typically high level of licensee activity during relatively short outage periods. The impact of extended operating cycles on the opportunity to inspect inside containment and the lack of inspection focus on passive components should be reviewed. This review should also determine whether the guidance and level of effort are sufficient for inspecting other plant areas which are difficult to access or where access is routinely restricted.*	Medium

3.3.4.(4)	*Revise IMC 0350 to permit implementation of IMC 0350 without first having established that a significant performance problem exists, as defined by the ROP.*	Medium
3.3.2(2)	*Revise the overall PI&R inspection approach such that issues similar to those experienced at DBNPS are reviewed and assessed. Enhance the guidance for these inspections to prescribe the format of information that is screened when determining which specific problems will be reviewed.*	Low
3.3.2(3)	*Provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews.*	Low
3.3.2(4)	*Revise inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding.*	
3.3.3(2)	*Perform a sample review of the plant assessments conducted under the interim PPR assessment process (1998-2000) to determine whether there are plant safety issues that have not been adequately assessed.*	Low
3.3.4(6)	*Provide ROP refresher training to managers and staff members.*	Low
3.3.5(2)	*Reinforce IMC 0102 expectations regarding regional manager visits to reactor sites.*	Low
3.3.5(3)	*Establish measurements for resident inspector staffing, including the establishment of program expectations to satisfy minimum staffing levels.*	Low