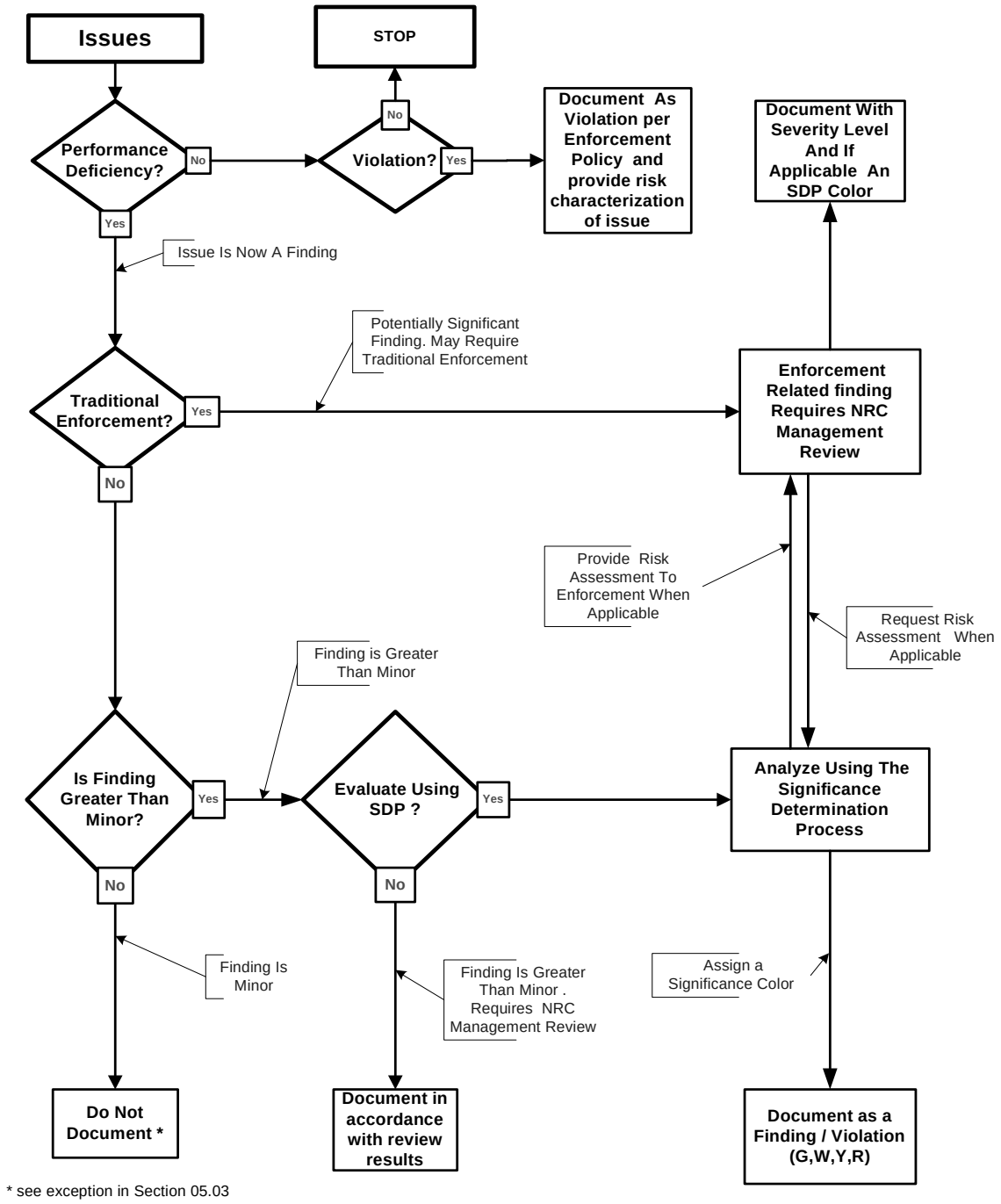
APPENDIX B
Issue Screening

Use Figure 1 and the questions listed below to determine if a finding has sufficient significance to warrant further analysis or documentation.

Figure 1



* see exception in Section 05.03

Page intentionally left blank

Section 1. Performance Deficiency Question

An issue must be a "performance deficiency" before it can be considered a finding.

(1) Did the licensee fail to meet a requirement or a standard?
(2) Was the cause reasonably within the licensee's ability to foresee and correct and could it have been prevented?

Section 2. Enforcement Questions

(1) Does the issue have actual safety consequence (e.g.: overexposure, actual radiation release greater than 10 CFR Part 20 limits)?

(2) Does the issue have the potential for impacting the NRC's ability to perform its regulatory function? For example, a failure to provide complete and accurate information or failure to receive NRC approval for a change in licensee activity, or failure to notify NRC of changes in licensee activities , or failure to perform 10 CFR 50.59 analyses etc. (see Enforcement Policy IV.A.3)

(3) Are there any willful aspects of the violation?

Section 3. Minor Questions

(1) Could the finding be reasonably viewed as a precursor to a significant event?

(2) If left uncorrected would the finding become a more significant safety concern?

(3) Does the finding relate to performance indicators that would have caused the PI to exceed a threshold?

(4) Is the finding associated with one of the cornerstone attributes listed at the end of this attachment and does the finding affect the associated cornerstone objective?

Section 4. SDP Questions

REACTOR SAFETY

CORNERSTONES — Initiating Events, Mitigating Systems, & Barrier Integrity
(1) Is the finding associated with an increase in the likelihood of an initiating event?
(2) Is the finding associated with the operability, availability, reliability, or function of a system or train in a mitigating system?

(3) Is the finding associated with the integrity of fuel cladding, the reactor coolant system, reactor containment or control room envelope?
(4) Is the finding associated with degraded conditions that could concurrently influence any mitigation equipment and an initiating event?
(5) Is the finding associated with or involve impairment or degradation of a fire protection feature?

Emergency Planning :
(1) Is the finding associated with a failure to meet or implement a regulatory requirement?
(2) Is the finding associated with a drill or exercise critique problem?
(3) Is the finding associated with an actual event implementation problem?

Operator Requalification:
(1) Is the finding related to licensee's grading of exams?
(2) Is the finding related to written exams?
(3) Is the finding related to an individual operating test?
(4) Is the finding related to simulator fidelity?
(5) Is the finding related to simulator scenario quality?
(6) Is the finding related to scenario security?
(7) Is the finding related to crew performance?
(8) Is the finding related to operator pass/fail rate?
(9) Is the finding related to operator license conditions?

RADIATION SAFETY

CORNERSTONE — Occupational (ALARA):
(1)Does the occurrence involve a failure to maintain or implement, to the extent practical, procedures or engineering controls, needed to achieve occupational doses that are ALARA*, and that resulted in unplanned, unintended occupational collective dose for a work activity?
[1] (2)Does the occurrence involve an individual worker(s) unplanned, unintended dose(s) that resulted from actions or conditions contrary to licensee procedures, radiation work permit, technical specifications or NRC regulations?
(3)Does the occurrence involve an individual worker(s) unplanned, unintended dose(s) or potential of such a dose (resulting from actions or conditions contrary to licensee procedures, radiation work permit, technical specifications or NRC

[1] "Yes" answer to this question does not necessarily indicate a violation of the requirement in 10 CFR Part 20.1101 (b). Compliance will be judged on whether the licensee has incorporated measures to track and, if necessary, to reduce exposures (e.g., whether the findings indicate an ALARA program breakdown).

regulations) which could have been significantly greater as a result of a single minor, reasonable alteration of the circumstances?
(4)Does the occurrence involve conditions contrary to licensee procedures, technical specifications or NRC regulations which impact radiation monitors, instrumentation and/or personnel dosimetry, related to measuring worker dose?

CORNERSTONE — Public
(1)Does the finding involve an occurrence in the licensee's radiological effluent monitoring program that is contrary to NRC regulations or the licensee's TS, Offsite Dose Calculation Manual (ODCM), or procedures?
(2)Does the finding involve an occurrence in the licensee's radiological environmental monitoring program that is contrary to NRC regulations or the licensee's TS, ODCM, or procedures?
(3)Does the finding involve an occurrence in the licensee's radioactive material control program that is contrary to NRC regulations or the licensee's procedures?
(4)Does the finding involve an occurrence in the licensee's radioactive material transportation program that is contrary to NRC or Department of Transportation (DOT) regulations or licensee procedures?

SAFEGUARDS

CORNERSTONE — Physical Protection
(1)Is the finding associated with or involve a failure to meet the requirements of 10 CFR 73.55 (b)-(h), or associated plans, procedure or rules?
(2)Is the finding associated with or impact any key attribute of the Physical Protection Cornerstone to meet its intended function whether in performance, design or implementation?

CORNERSTONE OBJECTIVES AND ATTRIBUTES
(related to Section 3, Minor Questions)

Cornerstone: REACTOR SAFETY / Initiating Events

Objective: to limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations.

Attributes:

Design Control:	Initial Design and Plant Modifications
Protection Against External Factors:	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Switchyard Activities, Grid Stability
Configuration Control:	Shutdown Equipment Lineup, Operating Equipment lineup,
Equipment Performance:	Availability, Reliability, Maintenance; Barrier Integrity (SGTR, ISLOCA, LOCA (S,M,L), Refueling/fuel handling equipment
Procedure Quality:	Procedure Adequacy
Human Performance:	Human Error

Cornerstone: REACTOR SAFETY / Mitigating Systems

Objective: to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage).

Attributes:

Design Control:	Initial Design and Plant Modifications
Protection Against External Factors:	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Seismic
Configuration Control:	Shutdown Equipment Lineup, Operating Equipment Lineup,
Equipment Performance:	Availability, Reliability
Procedure Quality:	Operating (Post Event) Procedure (AOPs, SOPs, EOPs); Maintenance and Testing (Pre-event) Procedures
Human Performance:	Human Error (Post Event), Human Error (Pre-event)

Cornerstone: REACTOR SAFETY/Barrier Integrity
Objective: to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radio nuclide releases caused by accidents or events.

Attributes: (Maintain Functionality of Fuel Cladding)

Design Control:	Physics Testing; Core Design Analysis (Thermal limits, Core Operating Limit Report, Reload Analysis, 10 CFR50.46)
Configuration Control:	Reactivity Control (Control Rod Position, Reactor Manipulation, Reactor Control Systems); Primary Chemistry Control; Core Configuration (loading)
Cladding Performance:	Loose Parts (Common Cause Issues); RCS Activity Level
Procedure Quality:	Procedures which could impact cladding
Human Performance:	Procedure Adherence (FME, Core Loading, Physics Testing, Vessel; Assembly, Chemistry, Reactor Manipulation); FME Loose Parts, Common Cause Issues

Attributes: (Maintain functionality of RCS)

Design Control:	Plant Modifications
Configuration Control:	System Alignment; Primary Secondary Chemistry
RCS Equipment and Barrier Performance:	RCS Leakage; Active Components of Boundary(valves, seals); ISI Results
Procedure Quality:	Routine OPS/Maintenance procedures; EOPs and related Normal Procedures invoked by EOPs
Human Performance:	Routine OPS/Maintenance Performance; Post Accident or Event Performance

Attributes: (Maintain Functionality of Containment)

Design Control:	Plant Modifications; Structural Integrity; Operational Capability
Configuration Control:	Containment Boundary Preserved; Containment Design Parameters Maintained
SSC and Barrier Performance:	S/G Tube Integrity, ISLOCA Prevention; Containment Isolation SSC Reliability /Availability, Risk Important Systems Function
Procedure Quality:	Emergency Operating Procedures; Risk important Procedures (OPS, Maintenance, Surveillance)
Human Performance:	Post Accident or Event Performance; Routine OPS/Maintenance Performance

Cornerstone: REACTOR SAFETY/Emergency Preparedness

Objective: To ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency.

Attributes:

ERO Readiness:	Duty Roster; ERO Augmentation System; ERO Augmentation Testing; Training
Facilities and Equipment:	ANS Testing; Maintenance Surveillance and Testing of Facilities, Equipment and Communications Systems; Availability of ANS, Use in Drills and Exercises.
Procedure Quality:	EAL Changes, Plan Changes; Use in Drills and Exercises;
RO Performance:	Program Elements Meet 50.47(b) Planning Standards, Actual Event Response; Training, Drills, Exercises
Offsite EP:	FEMA Evaluation

Cornerstone: RADIATION SAFETY/Occupational Radiation Safety

Objective: to ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation.

Attributes:

Plant Facilities/Equipment and Instrumentation:	Plant Equipment, ARM Cals & Availability, Source Term Control; Procedures (Radiation and Maintenance)
Program & Process:	Procedures (HPT, Rad Worker, ALARA); Exposure/Contamination Control and Monitoring (Monitoring and RP Controls); ALARA Planning (Management Goals, Measures - Projected Dose)
Human Performance:	Training (Contractor HPT Quals, Radiation Worker Training, Proficiency)

Cornerstone: RADIATION SAFETY/Public Radiation Safety

Objective: to ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain as a result of routine civilian nuclear reactor operation.

Attributes:

Plant Facilities/Equipment and Instrumentation:	Process radiation Monitors (RMS) (Modifications, Calibrations, Reliability, Availability), REMP Equipment, Meteorology Equipment, Transportation Packaging; Procedures (Design/Modifications, Equipment Calculations, Transportation Packages, Counting Labs)
Program & Process:	Procedures; (Process RMS &REMP, Effluent Measurement OC, Transportation Program, Material Release, Meteorological Program, Dose Estimates); Exposure and Radioactivity Material Monitoring and Control (Projected Offsite Dose, Abnormal Release, DOT Package Radiation Limits, Measured Dose)
Human Performance:	Training (Technician Qualifications, Radiation & Chemical Technician Performance

Cornerstone: SAFEGUARDS/Physical Protection

Objective: to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage.

Attributes:

Physical Protection System:	Protected Areas (Barriers and Alarms, Assessment); Vital Areas (Barriers and Alarms, Assessment)
Access Authorization System:	Personnel Screening; Behavior Observations; Fitness for Duty
Access Control System:	Search; Identification
Response to Contingency Events:	Protective Strategy; Implementation of Protective Strategy

Page intentionally left blank