

**DAVIS-BESSE LLTF ACTION PLAN**  
**MILESTONE TABLES**

# ACTION PLAN FOR ADDRESSING DAVIS-BESSE LESSONS LEARNED TASK FORCE RECOMMENDATIONS REGARDING ASSESSMENT OF BARRIER INTEGRITY REQUIREMENTS

Last Update: 8/15/03  
Lead Division: RES/DET  
Supporting Divisions: DRAA, DSARE  
Supporting Offices: NRR, Regions

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>Part I: Leakage</b>			
1. Review PWR TS to identify plants that have non-standard RCPB leakage requirements [LLTF 3.3.4(9):High]	7/03 (C) ML031980277	NRR/DIPM	
2. Review plant alarm response procedure requirements for leakage monitoring systems and assess their adequacy for identification of RCPB leakage [LLTF 3.2.1(3):High]	3/04 (T)	NRR/DIPM	RES/DET
3. Re-evaluate basis for RCS leakage requirements and assess the capabilities of currently used and state-of-the-art leakage detection systems [LLTF 3.2.1(1):High, 3.1.5(1):High]	7/04 (T)	RES/DET	RES/DRAA RES/DSARE NRR/DSSA NRR/DE NRR/DRIP NRR/DIPM
4. Develop recommendations for inspection guidance pertaining to RCS unidentified leakage that includes action levels to trigger increasing levels of NRC interaction with licensees in response to increasing levels of unidentified RCS leakage [LLTF 3.2.1(2):High]	1/05 (T)	NRR/DIPM	RES/DET NRR/DE NRR/DSSA

Milestone	Date (T=Target) (C=Complete)	Lead	Support
5. Develop recommendations for (1) improving plant procedures for identifying RCPB leakage, (2) consistent TS, and (3) use of on-line, enhanced leakage detection systems on critical components [LLTF 3.1.5(1):High, 3.2.1(1):High, 3.2.1(3):High, 3.3.4(9):High]	3/05 (T)	NRR/DIPM NRR/DRIP RES/DET	NRR/DE RES/DRAA NRR/DSSA NRR/DLPM
6. Use appropriate regulatory tools to implement improved requirements [LLTF 3.2.1(1):High]	TBD	NRR/DRIP	RES/DRAA RES/DSARE RES/DET NRR/DSSA NRR/DE NRR/DLPM
<b>Part II. Performance Indicators (PI)</b>			
1. Develop and implement improved barrier integrity PI based on <b>current</b> requirements and measurements [LLTF 3.3.3.(3):High]	6/04 (T)	NRR/DIPM	RES/DRAA RES/DET NRR/DE NRR/DSSA Regions
2. Develop and, if feasible, implement an <b>additional</b> PI capable of tracking the number, duration, and rate of primary system leaks. [LLTF 3.3.3.(3):High]	12/05 (T)	NRR/DIPM	RES/DRAA RES/DET NRR/DE NRR/DSSA Regions
3. Determine feasibility of establishing a risk-informed barrier integrity PI [LLTF 3.3.3.(3):High]	TBD	RES/DRAA	NRR/DIPM NRR/DSSA NRR/DE RES/DET Regions
4. Evaluate the need to modify existing barrier integrity PI's based on potential <b>new requirements</b> for RCS leakage from Part 1 [LLTF 3.3.3.(3):High]	TBD	NRR/DIPM	RES/DRAA RES/DET NRR/DE NRR/DSSA Regions

**DAVIS-BESSE LESSONS LEARNED TASK FORCE  
RECOMMENDATIONS REGARDING STRESS  
CORROSION CRACKING**

Last Update: 8/15/03  
Lead Division: DLPM  
Supporting Divisions: DE, DSSA,  
DIPM, & DRIP  
Supporting Offices: RES & Regions

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>Part I - Reactor Pressure Vessel Head Inspection Requirements</b>			
1. Collect and summarize information available worldwide on Alloy 600, Alloy 690 and other nickel based alloy nozzle cracking for use in evaluation of revised inspection requirements. [LLTF 3.1.1(1)-High ]	03/04 (T)	RES/DET	DE
2. Critically evaluate existing SCC models with respect to their continuing use in the susceptibility index. [LLTF 3.1.4(1)-Medium]	07/03 (C)	RES/DET	DE
3. a. Complete initial evaluation of individual plant inspections in response to Bulletins and Orders. b. Continue to review future inspection results until permanent guidelines are issued.	05/04 (T)  Ongoing	DE  DE	DLPM Regions  DLPM Regions
4. Monitor and provide input to industry efforts to develop revised RPV Head inspection requirements (ASME Code Section XI). [LLTF 3.3.4(8)-High LLTF 3.3.7(6)-Low]	06/04 (T) Note (1)	DE	RES/DET DSSA Regions Industry
5. Participate in meetings and establish communications with appropriate stakeholders (e.g., MRP, ASME). [LLTF 3.3.4(8)-High]	Ongoing	DE	RES/DET DLPM DRIP DIPM DSSA industry
6. Make decision to endorse revised ASME Code requirements, when issued, or implement alternative requirements. [LLTF 3.3.4(8)-High]	06/04 (T) Note (1)	DE	RES/DET

Milestone	Date (T=Target) (C=Complete)	Lead	Support
7. If alternative, determine appropriate regulatory tool and establish schedule for implementation.	09/04 (T) Note (1)	DE	DRIP DIPM DSSA RES/DET industry public
<b>Part II - Boric Acid Corrosion Control</b>			
1. Collect and summarize information available worldwide on boric acid corrosion of pressure boundary materials for use in evaluation of revised inspection requirements. [LLTF 3.1.1(1)-High]	10/04 (T)	RES/DET	DE
2. a. Evaluate individual plant responses to Bulletin 2002-01 regarding Boric Acid Inspection Programs (60-day responses and necessary follow-up). b. Issue public document to summarize evaluation of plant responses.	06/03 (C) ML031760568  07/03 (C) ML032100653	DE  DE	DLPM  DLPM DRIP
3. Participate in meetings and establish communications with appropriate stakeholders (e.g.,MRP, ASME).	Ongoing	DE	RES/DET DLPM DRIP DIPM DSSA industry
4. Evaluate need to take additional regulatory actions and determine appropriate regulatory tool(s).	06/03 (C)	DE	DLPM DRIP DIPM DSSA Regions
5. Develop milestones for additional regulatory actions, as necessary.	07/03 (C)	DE	DLPM DIPM DSSA DRIP
6. Review and evaluate the adequacy of revised ASME Code Requirements for Pressure Testing/Leakage Evaluation being developed by the ASME Code, Section XI, Task Group on Boric Acid Corrosion.	01/05 (T)	DE	RES/DET

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>Part III - Inspection Programs</b>			
1. Develop inspection guidance or revise existing guidance to ensure that VHP nozzles and the RPV head area are periodically reviewed by the NRC during licensee ISI activities. [LLTF 3.3.4(3)-High]	03/04 (T)	DIPM	DE Regions
2. Develop inspection guidance that provides for timely, periodic inspection of PWR plant BACC programs. [LLTF3.3.2(1)-High]	03/04 (T)	DIPM	DE Regions
3. a. Develop inspection guidance for assessing the adequacy of PWR plant BACC programs (implementation effectiveness, ability to identify leakage, adequacy of evaluation of leaks). b. Complete first inspection of each PWR. [LLTF 3.2.2(1)-High]	03/04 (T)  TBD	DIPM  DIPM	DE RES/DET Regions  Regions

Notes: (1) Milestone dates are based on projected issuance of industry proposals. However, staff may initiate action to establish alternative inspection requirements, if appropriate, prior to completion of industry activities.

**DAVIS-BESSE LESSONS LEARNED TASK FORCE  
RECOMMENDATIONS REGARDING OPERATING  
EXPERIENCE PROGRAM EFFECTIVENESS**

Last Update: 8/15/03  
 Lead Division: DRIP  
 Supporting Divisions: DE, DSSA,  
 DIPM, & DLPM  
 Supporting Offices: RES & Regions

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>Part I - Operating Experience Program: Objective Phase</b>			
1. Form Task Force with Steering Committee and develop Charter.	03/03 (C) ML030900117	NRR/RES	
2. Identify desirable agency operating experience program objectives and attributes, and	04/03 (C)	Task Force	DRIP, DIPM, DLPM, DE, DSSA,
2.a. Provide documented staff proposals of operating experience program objectives and attributes.	04/03 (C) ML031200312 ML031490535		DET/RES, DRAA/RES, DSARE/RES, Regions
2.b. Obtain executive management endorsement.	05/03 (C) ML031350156		
<b>Part II - Operating Experience Program: Assessment Phase</b>			
1. Define functional needs/areas and processes to meet objectives and attributes.	9/03 (T)	Task Force	DRIP, DIPM, DLPM, DE, DSSA, DET/RES, DRAA/RES, DSARE/RES, Regions
2. Review and evaluate current processes. [LLTF 3.1.6(1)]	9/03 (T)	Task Force	DRIP, DIPM, DLPM, DE, DSSA, DET/RES, DRAA/RES, DSARE/RES, Regions

Milestone	Date (T=Target) (C=Complete)	Lead	Support
3. Identify areas for improvements. [LLTF 3.2.4(1)]	09/03 (T)	Task Force	DRIP, DIPM, DLPM, DE, DSSA, DET/RES, DRAA/RES, DSARE/RES, Regions
4. Task Force issues draft report.	09/03 (T)	Task Force	
5. Task Force provides final report to Steering Committee documenting its specific program improvement proposals.	11/03 (T)	Task Force	
6. Steering Committee makes recommendations to office management on improvements to be made.	12/03 (T)	Steering Committee	
6.a Responsible organizations achieve consensus on proposals to implement.	12/03 (T)	NRR/RES	Regions
<b>Part III - Operating Experience Program: Implementation Phase</b>			
1. Develop implementation plan based on 6.a in Part II.	01/04 (T)	NRR/RES	Regions
1.a Implement specific improvements per implementation plan (1/04-12/04). [LLTF 3.1.6(2)] [LLTF 3.1.6(3)] [LLTF 3.3.4(2)]	12/04 (T)		
2. Establish processes to monitor effectiveness.	06/04 (T)	NRR/RES	Regions
<b>Part IV - Inspection Program Enhancements</b>			
1. Provide training and reinforce expectations to NRC managers and staff members to address the following areas: (1) maintaining a questioning attitude in the conduct of inspection activities; (2) developing inspection insights stemming from the DBNPS event relative to symptoms and indications of RCS leakage; (3) communicating expectations regarding the inspection follow-up of the types of problems that occurred at DBNPS; and (4) maintaining an awareness of surroundings while conducting inspections. Training requirements should be evaluated	12/03 (T)	DIPM	DE, DSSA, DET/RES, Regions



Milestone	Date (T=Target) (C=Complete)	Lead	Support
<p>to include the appropriate mix of formal training and on-the-job training commensurate with experience. Mechanisms should be established to perpetuate these training requirements. [LLTF 3.3.1(1)]</p>			
<p>2. Implement actions to maintain NRC expertise by ensuring that NRC inspector training includes: (1) boric acid corrosion effects and control; and (2) PWSCC of nickel based alloy nozzles. [LLTF 3.3.5(1)]</p>	12/03 (T)	DIPM	DE, DSSA, DET/RES, Regions

**DAVIS-BESSE LESSONS LEARNED TASK FORCE  
RECOMMENDATIONS REGARDING INSPECTION,  
ASSESSMENT, AND PROJECT MANAGEMENT GUIDANCE**

Last Update: 8/15/03  
Lead Division: DIPM  
Supporting Division: DLPM  
Supporting Office: Regions

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>Part 1 - Evaluation of Inspection Guidance Related To Problem Identification and Resolution</b>			
<p>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. [LLTF 3.2.5.(2) High]</p> <p>The NRC should revise the overall PI&amp;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. [LLTF3.3.2.(2) Low]</p> <p>The NRC should provide enhanced Inspection Manual Chapter guidance to pursue issues and problems identified during plant status reviews [LLTF3.3.2.(3) Low]</p> <p>The NRC should revise its inspection guidance to provide for the longer-term follow-up of issues that have not progressed to a finding. [LLTF3.3.2.(4) Low]</p>			
1. Make changes to IP 71152 to require annual follow-up of three to six issues.	01/02 (C)	DIPM	
2. PI&R focus group assess lessons learned recommendations.	03/03 (C)	DIPM	Regions
3. Develop draft procedure changes based on PI&R group recommendations and provide to regions for review.	04/03 (C) ML031390010	DIPM	Regions
4. Provide training on procedure changes.	11/03 (T)	DIPM	
5. Issue procedure changes.	12/03 (T)	DIPM	

Milestone	Date (T=Target) (C=Complete)	Lead	Support
<b>PART 2 - Evaluation of IMC 0350 Guidance</b>			
The NRC should develop guidance to address the impacts of IMC 0350 implementation on the regional organizational alignment and resource allocation. [LLTF3.3.5.(4) High]			
1. Assess past and present IMC 0350 data and associated inspection approaches.	06/03 (C) ML031890873	DIPM	Regions
2. Develop enhanced structure to the inspection approach used for IMC 0350 plants.	08/03 (T)	DIPM	Regions
3. Develop draft revisions to IMC and issue for regional comment.	09/03 (T)	DIPM	
4. Issue procedure revisions.	12/03 (T)	DIPM	
5. Include estimated resources for IMC 0350 plants into budget cycles.	12/03 (T)	DIPM	
<b>Part 3 - Evaluation of Project Management Guidance</b>			
The NRC should establish guidance to ensure that decisions to allow deviations from agency guidelines and recommendations issued in generic communications are adequately documented. [LLTF 3.3.7.(2) High]			
1. The DLPM Handbook will be updated with a new section that addresses documenting staff decisions.	02/03 (C)	DLPM	
2. A training package emphasizing compliance with the requirements of MD 3.53 will be developed and distributed to all Offices and regions.	04/03 (C) ML030300067	DLPM	
3. Follow up with Offices and Regions to determine effectiveness of training.	12/03 (T)	DLPM	