

March 11, 2004

MEMORANDUM TO: Davis-Besse Nuclear Power Station IMC 0350 Panel

FROM: John A. Grobe, Chairman, Davis-Besse Oversight Panel /**RA C. Lipa Acting for/**

SUBJECT: REVISED FEBRUARY 24, 2003 MINUTES OF INTERNAL MEETING OF THE DAVIS-BESSE OVERSIGHT PANEL (Additional Attachments Incorporated)

The implementation of the IMC 0350 process for the Davis-Besse Nuclear Power Station was announced on April 29, 2002. An internal panel meeting was held on February 24, 2003. Attached for your information are the minutes from the internal meeting of the Davis-Besse Oversight Panel; **the Radiation Protection Supplemental & Restart Readiness Inspection Plan (03-08); The Program Effectiveness Inspection Plan (03-09);** and the "Open" Action Items List.

Attachments: As stated

cc w/att: H. Nieh, OEDO
J. Dyer, RIII
J. Caldwell, RIII
M. Parker, RIII
DB0350

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FROM: John A. Grobe, Chairman, Davis-Besse Oversight Panel

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OFFICE	RIII	RIII	RIII
NAME	RBaker:ntp	CLipa	/RA C. Lipa Acting for/ JGrobe
DATE	03/11/04	03/11/04	03/11/04

OFFICIAL RECORD COPY

MEETING MINUTES: Internal Davis-Besse Oversight Panel Meeting
Davis-Besse Nuclear Power Station

DATE: February 24, 2003

TIME: 1:00 p.m. Central

ATTENDEES:

J. Grobe	J. Hopkins	J. Collins
B. Dean	D. Passehl	M. Phillips
A. Mendiola	C. Thomas	

Agenda Items:

1. Discuss Plant Status and Inspector Insights

C. Thomas briefed the Davis-Besse Oversight Panel (DBOP) on the current plant status.

- Fuel Load on hold due to grid strap damage identified on one new fuel assembly that may have been created due to fuel movement. Licensee analysis and resolution teams are currently investigating cause and solutions.
- Integrated Safety Features Actuation System test for the #2 train is scheduled later this week. Action is waiting on resolution of #2 Make-up Pump bearing issues.
- Air Operated Valves - 21 Safety significant AOV's were identified by the licensee as needing modification. One AOV may require replacement with a MOV. Licensee assessment is underway.
- Emergency Diesel Generator #1 - An operability evaluation on #1 EDG identified that the Diesel was operable in Modes 5 and 6 but not in 1, 2, 3 or 4 until further evaluation could be performed. C. Thomas is investigating the issue.

2. Discuss TSP Amendment (Action Item 54a)

The item was discussed by the DBOP. Further communications with the Technical Specification Branch in Headquarters was deemed necessary. Meeting is scheduled for tomorrow.

3. Discuss Bulletins' 2002-01 and 2002-02 response (Action Item 97)

The item was discussed by the DBOP. Licensee response to an RAI request is expected on March 7.

4. Status Allegations Older than 120 Days

The item was discussed by the DBOP. Three items remain outstanding. A chilling effect letter was recommended for rework prior to being brought to the DBOP for approval.

5. Discuss/Approve Programs Inspection Plan

The items were discussed by the DBOP. The DBOP approved that RAM items covered within various inspection scopes will be listed on the RAM and in Inspection Reports by RAM number.

6. Discuss Action Items

Action Item 156 was discussed by the DBOP. A communication form was deemed necessary from the DBOP to the Licensee asking them to re-respond to GL98-04. The DBOP identified the previous response as inadequate. Action Item 161 was closed due to the activity being accomplished.

An action was discussed to issue a letter to the licensee to ensure all licensee Bulletin and GL responses were accurate. This item was tabled for further discussion.

7. Discussion of Licensing Issues and Actions

Weekly licensee licensing call scheduled for this week.

8. Discuss Items for Licensee Weekly Calls

Weekly licensee licensing call scheduled for this week.

9. Discuss/Update Milestones and Commitments

- 2/27 - Jim Dyer, Jack Grobe, Brian Sheron, and Roland Lickus will brief Ohio Governor Taft and 10-15 others in the state of Ohio offices on Davis-Besse.
- 3/11 - 0350 Public Meeting
- 4/15 - 0350 Public Meeting
- 4/16-18 - Reg Info Conference
- 4/22 & 23 - Agency Action Review Meeting
- 4/24 - Senior Management Meeting
- 5/6 - 0350 Public Meeting
- 5/15 - ROP Commission Meeting
- 6/17 - 0350 Public Meeting - Due to a FirstEnergy Board of Directors meeting on site June 17, looking at June 2 for the ROP and June 3 for the Public Meeting

Item Number	Action Item (Date generated)	Assigned to	Comments
24a	Discuss making information related to HQ/licensee calls publicly available	Panel	<p>Discuss by June 30, after safety significance assessment complete. 6/27 - Invite Bateman to panel mtg. To discuss what else is needed to closeout the CAL (i.e. quarantine plan). 7/2 - NRR not yet ready to discuss. 7/16 - See if procedures have changed on CAL closeout - does JD need to send letter? 7/18 - Discussed - is there an applicable regional procedure? 8/6 - Discussed. Need to determine the final approach on the core removed from the head and the final approach on the head before the quarantine can be lifted. 8/22 - Revisit action item after letter sent to licensee confirming plans with old vessel head (head may be onsite longer than originally anticipated) 8/29 - Memo to be sent to Region, with a letter to go out next week. 10/01- Discussed. 1) Conduct NRC staff survey-due 10/7 2)Memo to NRR - due 10/11 3) Region to issue letter 11/07- Letter required from NRR on head quarantine status. 11/19 - Letter in draft. 01/03 - A. Mendiola to look at phone conference writeups on quarantine decision making to determine if they can be released to the public. 01/07 - discussed 01/21 - discussed. 01/31- A. Mendiola's action. 02/11 - Completion of Licensee Phase 3 sampling plan required. 02/21 - 17.5 Rem to cut samples, Less samples may be required.</p>

Item Number	Action Item (Date generated)	Assigned to	Comments
54a	Review TSP amendment and advise the panel on the need for a TIA on Davis-Besse (7/2)	D. Pickett	<p>7/9 - Discussed. Will wait for response from licensee. 7/16 - Discussed - added action item 54b. 8/6 - Sent to the licensee on 7/22 and a response is due by 8/22. 8/22 - Discussed - need to check if response has been received. 8/27 - Received response - DRS is reviewing - will fax to NRR for 54b. 8/29 - Discussed, DRS report of response to be issued to panel prior to item 54b. 10/1 - Discussed. DRS coordinating with NRR 11/07 - Discussed - On hold for draft with specific information. 12/10 - B. Dean believed B. Bateman thought a calculation for sufficient volume of TSP was completed to technical specification value. However questions whether the calculation was to technical specification or actual TSP level remain. 01/03 - Item under NRR review. Calculation completion expected on Jan 17. Allegation issue in RIII domain. 01/07 - Allegation Item #3 under NRR Review for Resolution. 01/21 - Item #3 is under Region III control for final letter, holding for NRR input. 02/11 - Writeup for NRR input provided 4 answers, going back to reviewer to ensure specific tasking is clear to answer allegation concerns. Action item 54c created. 02/21 - Allegation at 242 day mark. Effective expression of due date required; 02/24 - further communications with the Technical Specification Branch in HQ deemed necessary</p>

Item Number	Action Item (Date generated)	Assigned to	Comments
54c	In relation to action item 54a - Assess method to ensure Technical Specifications are adequate for a cycle, administrative controls vs. amending Technical Specifications (02/11)	A. Mendiola	02/11 - Address first meeting in March
73	Send feedback form on IMC 0350 procedure to IIPB (8/6)	Lipa Mendiola	8/6 - Generate feedback after panel meetings reduced to once per week. 8/29 - Discussed - no change. 10/1 - Discussed. 11/7 - D Passehl sent email to C Carpenter and D Coe indicating that we would be able to perform a review of the draft IMC 0350 during the first quarter of 2003. 12/3- discussed. 01/03 - 2 parts, short part- C. Lipa with P. Harris, long part- B. Dean. 01/07 - 2 nd larger response will require meeting between all parties. 01/21 - Communications with P. Harris 01/31-Meeting with P. Harris on Feb 4. 02/11 - Many concerns identified by the panel for inclusion. 02/21 - July 1 due date for larger input.
97	Bulletins 2002-01 and 2002-02 response and acceptance (9/5)	NRR	11/07 - Discussed, further research and discussion required; 01/07 - RAI response expected Mid February; 01/31- On track; 02/11 - New Orders will supercede BL2002-01 and BL2002-02 responses with the exception of the BL2002-01 Boric Acid Corrosion program information request; 02/21 - Licensee RAI response delayed. Both Order and BL2002-01 Boric Acid Corrosion program responses to be tracked as RAM items; 02/24 - Licensee response to an RAI request is expected on March 7.

Item Number	Action Item (Date generated)	Assigned to	Comments
126	Review Davis-Besse/Vessel Head Degradation web site content for ease of use by the public. (11/07)	Strasma	02/11 - Checked, but revisiting item. 02/21 - Web site being reassessed.
132	Consolidate RAM (12/19)	C.Lipa/ A.Mendiola	Due Fri 1/17. 01/31 - Item open 02/11 - working 02/21 - to determine the need for ONE list.
133	12/29 Taping of debate	J.Collins/ D.Simpkins	01/03 - Licensee to deliver tape to J. Strasma 02/24 - Tape sent
136	NRR acceptance of NOP/NOT criteria and method (01/03)	W. Dean	01/07 - Item discussed. Meeting summary of November 26, 2002 meeting has notation of NRR staff impressions of test plan. Once drafted, issue will be surveyed to staff to determine if consciences is correct. 01/21 - Meeting summary to discuss Flus System, Test agreement, and future inspections. 1/31 - T. Chan fwd to J. Hopkins. 2/11 - J. Jacobson questions need to be folded in (chem-wipes) 2/21 - Polling of staff discussed. 2/24 - Polling of staff by March 7
138	Evaluate the effectiveness of the Comm Plan (01/07)	A. Mendiola, C. Lipa	01/31 - Ongoing 02/21 - New EDO Comm Plan for Crisis Update, A. Mendiola to review for inclusion.
139	Licensing Actions Review for DBOP internal meeting on 01/21/03 (01/07)	J. Hopkins	01/21 - Moved to next internal meeting. 01/31 - Moved 02/11 - Next meeting 02/21 - Moved
142	Properly reassign past inspection hours charged to TAC W90086 into the Reactor Program System (RPS). Prepare a memo to JDyer to reassign hours. (01/09)	C. Lipa	01/31 - In progress 02/11 - Resident Inspector 0350 special inspection plans presented to the panel and accepted. 02/21 - Note how many 0350 hours would have been assigned to inspection prior to the 0350 inspection TAC creation.
143	Prepare a special inspection plan for the NOP/NOT test. (01/09)	J. Jacobson	02/21 - date to be determined

Item Number	Action Item (Date generated)	Assigned to	Comments
144	Prepare a special inspection plan for the corrective action team inspection. (01/09)	D. Hills	01/31 - Working Z. Falevits and R. Gardner 02/21 - date to be determined
145	Prepare a special inspection plan for the restart readiness team inspection. (01/09)	D. Passehl	02/21 - date to be determined
147	Generate a list of items to consider after restart as well as transition back to the normal 0350 when terminating the 0350 Panel. The items should include plans to augment inspection of corrective actions, inservice inspection, and safety culture monitoring. (01/09)	D. Passehl	01/31 - working 02/11 - Include dates and deadlines to Manual Chapter 0350 restart inspections planner
149	SRI to coordinate with GWright inspection of corrective actions that have been completed by the resident staff. The intent is to find ways to allow GWright's inspection to take credit for what the resident staff already accomplished. (01/09)	S. Thomas	01/31 - open 02/11 - Documented items in Resident Inspection Report 02/21 - Good communications noted
150	SBurgess to develop a position paper on the state of plant risk when the plant attains Mode 4 for the first time. The purpose is to support NRC scheduling of major inspections until closer to Mode 2. (01/09)	S. Burgess	

Item Number	Action Item (Date generated)	Assigned to	Comments
151	Develop a plan to assess the safety culture at the plant to close Restart Checklist Item 4.b, effectiveness of corrective actions. Discuss at next 0350 internal Panel meeting. (01/09)	G. Wright	
154	Marty has action to followup by 1/21 with licensee to understand licensee's actions to address common mode failure issues (i.e., topical issues) and brief Panel. Then develop inspection plan to address topical issues. (01/09)	M. Farber	02/21 - Date to be determined
156	Read Generic Safety Issue-191, "Assessment of Debris Accumulation on PWR Sump Pump Performance" (01/09)	J. Hopkins	01/21 - Determine status of GSI-191; 02/21 - Check GL98-04 response on coatings. Draft GL and Draft Reg Guide needs review for DB relevance; 02/24 - Request Response Review and Program Implementation to GL98-04
158	In Ken O'Brien's programmatic inspection plan, add to the summary page the addition of Restart Checklist Item 3.i, Process for Ensuring Completeness and Accuracy of Required Records and Submittals to the NRC, and deletion of Item 3.h, Radiation Protection Program. (01/09)	D. Hills/ J. Jacobson	
160	Draft fragnet of inspection resources, plans, and schedules. (01/09)	C. Lipa	01/21 - Fragnet-"time line". 01/31 - Names needed
161	Update the RAM. (01/09)	J. Jacobson M. Phillips	02/21 - Add NCV's to RAM

Item Number	Action Item (Date generated)	Assigned to	Comments
162	Modified Containment Walkdown List assessment to look into effects on ILRT and NOP/NOT tests. (01/21)	P. Lougheed	02/21 - Factor into ILRT plan
163	Flag Allegations requiring action prior to restart (01/21)	M. Phillips	02/11 - All of them require action. Resolve with one letter including Item 164 02/21 - Develop criteria for Allegations considered Restart Items. Criteria needs Panel approval.
164	Discuss the need for a Chilling Effect Letter with Bruce Berson (01/21)	M. Phillips	01/31 - Pre-work and then ARB 02/11 - Resolve with one letter including Item 163 02/21 - Draft letter with C. Lipa, emailed to Panel for review.
166	Once DRS has developed a draft CY-2004 baseline inspection schedule for Davis-Besse (in conjunction with the upcoming regional inspection planning meeting), DRS will present this to the 0350 panel for review. (01/31)	Panel	02/11 - currently in planning 02/21 - inspection schedule letter due as soon as possible.
170	Prepare a special inspection plan for the ILRT (02/11)	M. Farber	
172	Create a schedule letter to replace/notify that annual assessment letter and end of cycle public meetings are not occurring. (02/11)		02/11 - Panel determined that Annual Assessment letter and End of Cycle public meetings not occurring.
173	Prepare an OSHA MOU letter based on email dated 2/6 from Bilik. (2/18)	S.Thomas	02/21 - D. Simpkins working
174	Review 2/4 transcript for Mr. Witt's recommendations. (2/18)	R. Lickus	

Item Number	Action Item (Date generated)	Assigned to	Comments
175	LER licensee commitment on Containment Air Cooler Supplement for 01/31/03 (02/21)	J. Hopkins	02/21 - Attempt to get by end of February

INSPECTION PLAN

DAVIS BESSE RADIATION PROTECTION SUPPLEMENTAL & RESTART READINESS INSPECTION

Inspection Report 50-346/2003-08

Inspection Scope

Supplemental Inspection (95002)

Review of the two White performance issues related to the adequacy of: (1) evaluations to characterize the radiological work environment prior to steam generator jumps; and (2) measurements and assessments to determine the intake of radioactive materials to those workers involved in steam generator jumps.

Restart Readiness Inspection

Restart Action Matrix Issues: Review of selected radiation protection (RP) program areas listed in the MC 0350 Restart Panel Action Matrix (Supplemental Items 061-094), as deemed necessary based on deficiencies identified during special team inspections conducted in 2002, and as documented in Report No. 50-346/01-06 and No. 50-346/02-16.

Restart Checklist Issues: Review adequacy of RP program to support restart (checklist item 3 (h)), in both occupational and public radiation safety cornerstone areas.

Inspection Objectives

The inspection is being conducted consistent with the agency action matrix for one degraded cornerstone, and as part of the Manual Chapter 0350 process. The primary inspection objectives are as follows:

Supplemental:

10. Provide assurance that the root and contributing causes are understood by the licensee for the two White performance issues.
11. Independently assess the "extent of condition" relative to the two White performance issues.
12. Provide assurance that the licensee's corrective actions for the two White performance issues are sufficient to address the root and contributing causes and to prevent recurrence.

Restart Readiness:

1. Assess the scope, depth and quality of the licensee's Phase 2 review of the RP program and the associated corrective actions. Independently evaluate the readiness of the RP program to support restart and normal operations for selected areas in both the occupational and public radiation safety cornerstones.

Onsite Inspection Dates

February 24 - 28, 2003 and March 10-14, 2003
One additional onsite week if deemed necessary

Site Contacts

Robert Pell, Radiation Protection Manager (419) 321-7865 or (419) 460-9249
Ray Lewis, Radiological Consultant
George Honma, Regulatory Affairs (419) 321-7986 or (419) 304-2304

Plan Prepared By: /RA/2/20/03
W. Slawinski, Senior Radiation Specialist

Reviewed By: /RA/2/20/03
H. Peterson, Acting Chief, Plant Support Branch

 /RA RCaniano for/ 2/21/03
C. Pederson, Director, Division of Reactor Safety

Approved By: /RA/2/20/03
J. Grobe, Chairman, Davis-Besse 0350 Panel

INSPECTION PLAN DETAILS

- I **Inspectors:**** Wayne Slawinski, Senior Radiation Specialist/ Inspection Team Lead
John House, Senior Radiation Specialist
Ryan Alexander, Radiation Specialist (second onsite week only)
James Wigginton, Senior Health Physicist, NRR (second onsite week)

II **Inspection Activity Timeline**

Preparation: Region III Office, February 18-21, 2003

Onsite Inspection: February 24 - 28, 2003
(week one)

Supplemental (95002) Inspection - Assess the licensee's root cause and extent of condition evaluation and corrective actions for the two White performance issues. Conduct an independent extent of condition evaluation relative to the performance issues (House and Slawinski).

Onsite Inspection: March 10 - 14, 2003
(week two)

Restart readiness inspection of various RP program areas including the radioactive materials control program, RP organizational controls and staff training/qualifications, RP procedures and processes relative to work planning, work oversight/control and human performance (All Team Members).

Entrance Meeting: February 24, 2003 @ 3:00 p.m. (D-BAB Rooms 209/210)

Exit Meeting: Team member debrief on March 14, 2003, unless an additional week of onsite effort is warranted. Regulatory performance (public) meeting following team debrief (date to be determined).

Inspection Report Preparation: Completed inputs should be provided to the lead inspector 2 weeks following the team's onsite debrief. A draft report to be completed for management review approximately 3-weeks following onsite debrief.

III **Inspection Procedures**

Inspection procedure 95002 will be used for the supplemental effort related to the two White performance issues. The independent "extent of condition" evaluation and restart readiness efforts will employ a variety of inspection procedures and other relevant guidance depending upon the specific program areas being reviewed. Specific focused area inspection procedures to be used are as follows:

IP 71841, "Supplemental Inspection for Human Performance"

IP 83502.03, "Radiological Environmental Monitoring and Radioactive Material Control Programs"

IP 83723, "Training and Qualifications - General Employee Training, Radiation Safety, Chemistry and Radwaste"

IP 83725, "Internal Exposure Control and Assessment"
IP 83728, ALARA"

In addition, appropriate aspects of IP 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input," will be utilized.

IV Inspection Requirements

The supplemental inspection will assess the adequacy of the licensee's evaluation for the two White performance issues, the licensee's extent of condition evaluation and associated corrective actions. An independent extent of condition evaluation will also be conducted by the inspectors for the two White performance issues, consistent with IP 95002.

During the second week of the onsite inspection effort, the team will review areas of the licensee's RP program selected from the Restart Action Matrix that relate to areas found deficient during two special team inspections conducted in 2002, as documented in Report No. 50-346/02-06 and No. 50-346/02-16. The depth and breadth of these efforts will be guided by the procedures listed in Section III above.

Specific inspection requirements for the two White performance issue will include:

1. Verification that the licensee implemented a systematic approach in determining the root and contributing causes for the two White performance issues. In particular, determine if the licensee conducted its evaluation to a acceptable level of depth to identify the root causes(s) rather than symptoms. Also, determine if the licensee adequately considered prior operating experiences, results of self-assessments, audits and other aspects of its problem identification program in developing the root and contributing causes.
2. Evaluation of the licensee's assessment of the generic applicability of the root causes to other RP and plant programs/processes to determine if an adequate "extent of condition" evaluation was performed. For example, the issues identified as root or contributing causes may apply to other aspects of the licensee's corrective action (problem identification) program. Did the license's problem identification and resolution program identify problems or precursors related to the performance issues? If not, why?
3. Verification that each root cause identified by the licensee is addressed by a corrective action, that each action is prioritized with respect to its risk significance, is assigned an owner and scheduled for completion, and that a formal means has been developed to assess the effectiveness of the actions to prevent recurrence.

Specific inspection requirements for the restart readiness evaluation will include:

- Review of the licensee's "Phase 2 Radiation Protection Program Review," its overall scope and depth, and the adequacy of the associated corrective actions.

- Evaluation of selected areas of the RP program to assess the licensee's restart readiness, as provided by the focused area inspection procedures listed in Section III.

V Starfire and Inspection Hours

Approximately 240 hours of direct inspection effort is anticipated for the overall effort. However, the inspection effort expended by the NRR representative (approximately 40 - 50 hours) will not be charged to the licensee as inspection time since the individual does not satisfy the inspector qualification requirements of MC 1245. Generally, individual inspection effort for RIII participants should be charged to IP 95002 with an IPE code of SEP for preparation effort, SP for inspection effort and SED for documentation.

VI Findings

The safety significance of inspection findings will be determined through MC 0609, "Significance Determination Process".

VII Documentation

The inspection report will be prepared in accordance with MC 0612, "Power Reactor Inspection Reports".

INSPECTION PLAN

DAVIS BESSE PROGRAM EFFECTIVENESS

Inspection Report 50-346/2003-09

Inspection Objectives

This inspection is being conducted as a part of the NRC's Manual Chapter 0350 activities. The primary inspection objectives will be to:

- Evaluate the licensee's implementation of the Program Effectiveness Building Block in their Return-to-Service Plan.
- Verify that the licensee's reviews of the Inservice Inspection Program, Plant Modifications Program, Quality Audits, and Operating Experience Program adequately assess program effectiveness and identifies areas requiring corrective action.
- Review the licensee's Implementation Action Plans and verify that adequate corrective actions have been effected for the Boric Acid Corrosion Control Program, Corrective Action Program, Inservice Inspection Program, Plant Modifications Program, Quality Assessments, and Operating Experience Program.
- Evaluate the Reactor Coolant Unidentified Leakage Program and associated procedures for comprehensiveness and effectiveness.
- Evaluate the licensee's program for assuring completeness and accuracy of required records and submittals to the NRC.

Onsite Inspection Dates: March 3 - 14, 2003
 March 17 - 21, 2003
 See note below
 Exit TBD

Note: These dates do not include inspection of the Quality Assessment review and corrective actions, review of corrective action program and boric acid program corrective actions, nor evaluation of the program for assuring completeness and accuracy or required records and submittals (dates TBD).

Site Contacts: Neil Morrison, Program Effectiveness Plan Owner, (419) 321-7707
 Bill Morini, Regulatory Affairs, (419) 321-7523

Prepared By: /RA/
 J. M. Jacobson, Senior Reactor Engineer

Approved By: /RA/
 J. Grobe, Chairman, Davis-Besse Oversight Panel

Reviewed By: /RA/
 D. Hills, Chief, Mechanical Engineering Branch

Inspection Plan Details

- I. Inspectors:** M. Bielby, Operator Licensing Examiner
N. Shah, Resident Inspector, Braidwood
J. Jacobson, Senior Mechanical Engineer
S. Burton, Senior Resident Inspector
Inspectors for weeks 4 and 5 discussed below have not yet been assigned.

II. Inspection Activity Schedule

Preparation: Off site reviews will commence 2/18/2003 as licensee material becomes available.

Onsite Inspection: Week 1 & 2 - March 3 - 14, 2003

[ISI and Modification Control Program]

Week 3 - March 17 - 21, 2003

[Operating Experience Program and Reactor Coolant System Unidentified Leakage Program]

Week 4 & 5 - TBD

[Quality Assessments, completeness and accuracy of required records and submittals, Boric Acid Corrosion Control Program and, Corrective Action Program]

Exit Meeting: To Be Determined

Inspection Report Input Preparation:

Inspection report inputs should be developed during the first week following each inspection visit. Completed inputs should be provided to the lead inspector by the close of business Friday of the week following each onsite inspection visit.

A draft report will be completed for management reviewed, comment, and concurrence by approximately 3 weeks following the last week of onsite inspection.

III. **Applicable Inspection Procedures and Other Guidance:**

Inspection Procedure IP 93812, "Special Inspection" will provide overall guidance for this effort. Other inspection procedures listed below will be used for guidance as needed.

IP 71111.08, "Inservice Inspection"

IP 71111.17, "Permanent Plant Modifications"

IP 71152, "Identification and Resolution of Problems"

IP 73051, "Inservice Inspection - Review of Program"

IP 73052, "Inservice Inspection - Review of Procedures"

IP 95001, "Inspection For One Or Two White Inputs In A Strategic Performance Area"

IP 95002, "Inspection For One Degraded Cornerstone Or Any Three White Inputs In a Strategic Performance Area"

IP 95003, "Supplemental Inspection For Repetitive Degraded Cornerstone, Multiple Degraded Cornerstone, Multiple Yellow Inputs, Or One Red Input"

Because of the nexus of individual program shortcomings and the subsequent assessments to many of root and contributing causes for the reactor vessel head corrosion event, each of the program assessment reviews will incorporate aspects of IPs 95001, 95002, and 95003, as appropriate.

• **Inspection Requirements**

The inspection will focus on evaluating the depth, completeness, and accuracy of the licensee's assessment of the health of the selected programs which contributed to the reactor vessel head corrosion event including implementation of associated corrective actions and program enhancements.

The NRC staff's inspection efforts will include independent assessment of the licensee's conclusions based upon risk-informed samples of relevant materials [condition reports, procedures, program outlines, recent program changes, plant modifications], walkdowns of plant equipment and surveillance results associated with the inservice inspection efforts, and interviews with responsible licensee staff and management.

Specific inspection requirements will include:

- Review applicable portions of the licensee's "Building Block" program plan, Return-to-Service Plan, Restart Action Plan, and Restart Action Process.
- Review and evaluate a sampling of completed Phase 1 program reviews for depth and completeness.
- Evaluate the Reactor Coolant Unidentified Leakage Program and associated procedures for comprehensiveness and effectiveness.
- Review and evaluate the ISI, Modification Control, and Operating Experience program effectiveness assessments for depth and completeness. The reviews will consider the:
 - proper application of the guiding review procedure;
 - identification and resolution of issues documented in the prior root and contributing cause evaluations;

- identification, assignment, and inclusion in applicable programmatic procedures of critical roles, responsibilities, and interfaces;
 - identification and application of appropriate programmatic performance assessment criteria and feedback mechanisms.
- E) Review and evaluate the comprehensiveness and effectiveness of the licensee's implementation of corrective actions and program enhancements for the ISI, Modification Control, Boric Acid Corrosion Control, Corrective Action, Quality Audit, and Operating Experience programs.
- F) The following MC 0350 Restart Action Matrix items are associated with this inspection effort: L-36, 37, 48, 49, 50, 51, C-03, 04, and SUP-16, 18, and 20.

V. RITS and Level of Effort

Docket No.	05000346
Report No.	2003-009

Approximately 80 hours of direct inspection effort is anticipated for each inspector's effort. Generally, individual inspection effort should be charged to IP 93812 with an IPE code of SEP for preparation efforts, ER for inspection efforts, and SED for documentation efforts.

VI. Findings

The safety significance of inspection findings will be determined through MC-0609, "Significance Determination Process," with additional information from the Risk-Informed Inspection Notebook for Davis Besse.

VII. Documentation

The report will be prepared in accordance with MC 0612, "Power Reactor Inspection Reports." Please review Appendix B, "Threshold for Documentation," in the above document to ensure consistency within the agency.