

March 11, 2004

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

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

SUBJECT: REVISED JULY 15, 2003 MINUTES OF INTERNAL MEETING OF THE DAVIS-BESSE OVERSIGHT PANEL (Agenda Discussion Item Appended)

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 July 15, 2003. Attached for your information are the minutes from the internal meeting of the Davis-Besse Oversight Panel, Radiation Protection Inspection Plan, the "Open" Action Items List, and those Restart Action Matrix Items closed at this meeting.

Attachments: As stated

cc w/att: H. Nieh, OEDO  
J. Dyer, RIII  
J. Caldwell, RIII  
R. Gardner, DRS  
B. Clayton, EICS  
G. Wright, DRP  
DB0350

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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 July 15, 2003. Attached for your information are the minutes from the internal meeting of the Davis-Besse Oversight Panel, Radiation Protection Inspection Plan, the "Open" Action Items List, and those Restart Action Matrix Items closed at this meeting.

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OFFICE	RIII	RIII	RIII
NAME	RBaker	CLipa	<i>/RA by C. Lipa Acting for/ JGrobe</i>
DATE	03/11/04	03/11/04	03/11/04

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MEETING MINUTES: Internal IMC 0350 Oversight Panel Meeting  
Davis-Besse Nuclear Power Station

DATE: July 15, 2003

TIME: 1:00 p.m. Central

ATTENDEES:

J. Grobe	J. Rutkowski	R. Doornbos
D. Passehl	C. Lipa	B. Ruland
D. Hills	J. Hopkins	J. Stang
P. Lougheed	M. Phillips	J. Strasma
S. Thomas	V. Mityling	

Agenda Items:

1. Discuss Davis-Besse RCP Allegations

P. Lougheed briefed the Panel on an allegation with several concerns associated with the reactor coolant pumps. The response to the allegation should be sent out this week or early next week.

**NEW ACTION ITEM:** Jan Strasma took action to put a discussion of the actions the NRC took in reviewing concerns involving the reactor coolant pumps in the August 2003 newsletter.

2. Discuss New Incoming Letters and Plan

V. Mityling, J. Strasma, and R. Doornbos presented to the Panel the options for responding to the emails and letters from citizens of Ohio and elsewhere regarding Davis-Besse. The specific concerns relate to citizens' requests that Davis-Besse should remain shutdown and that Davis-Besse management is not emphasizing safety over schedule or profit.

**NEW ACTION ITEM:** Jan Strasma took action to put a discussion of the actions the NRC is taking to respond to the emails and letters from concerned citizens regarding Davis-Besse in the August 2003 newsletter. This includes responding to the citizens and Amy Rider with a letter including a copy of the most recent newsletter.

**NEW ACTION ITEM:** J. Grobe took action to send an email to E. Merschoff and L. Chandler inquiring how the Panel should handle the correspondence in ADAMS.

3. Discuss New Allegations

M. Phillips informed the Panel that there were no new allegations.

4. Discuss Any Allegations for Which an Extension Was Requested

M. Phillips informed that Panel that there were no allegations for which an extension was requested.

5. Discuss Closed Restart Action Matrix (RAM) Items and Closure Forms

M. Phillips presented the closed Restart Action Matrix (RAM) items and closure forms. **THE PANEL APPROVED THE CLOSURE FORMS WITH MINOR COMMENTS. THE FINAL CLOSURE FORMS ARE ATTACHED TO THESE MINUTES.**

6. Discuss Section B3 of Process Plan

D. Passehl discussed Section B3 of the Process Plan. Mr. Passehl will incorporate the Panel's comments.

7. Discuss Action Items

The Panel discussed recent Action Items.

**Item 188** (Closed) - Arrange for Radiation Protection Inspection to evaluate stability in Radiation Protection organization effectiveness. An inspection plan is to be drafted and presented to the Panel for approval, including applicable Restart Action Matrix items, for an inspection to be conducted in the July 2003 time frame

J. Grobe approved the inspection plan. **THE APPROVED RADIATION PROTECTION INSPECTION PLAN IS ATTACHED TO THESE MINUTES.**

**Item 189** (Open) - Investigate how the NRC handled communication of potential inspection issues and findings during in-progress inspection work at Millstone in regards to their organization and human performance problems

The Panel decided to change the title of this item to "Collect Information on the Regulatory Approach to Research the Process to Ensure Proper Regulatory Footprint upon Restart."

**Item 191** (Closed) - Prepare Questions and Answers (Qs and As) once the GT 221 letter to Rep. Kucinich is issued to ensure consistent communications regarding how the NRC articulates issues to the public

The Panel determined that this item was already captured by Action Item 197.

**Item 194** (Closed) - Add to the Restart Checklist the licensee's Technical Specification Amendment Request to relocate the high pressure injection and low pressure injection subsystems flow balance testing requirement in Technical Specification 4.5.2.h to the Updated Safety Analysis Report Technical Requirements Manual

Action was complete with issuance of Restart Checklist dated July 2, 2003.

**Item 198** (Closed) - Call Billie Garde on the section of the letter regarding "missed opportunities." The specific paragraph includes the statement: "Mr. Siemasko has identified at least twenty-three separate "missed opportunities" that could have prevented the propagation of G9 nozzle crack during the 14 years prior to 12 RFO in the spring of 2000." This action is due June 27

B. Clayton called Ms. Garde.

**Item 199** (Closed) - Contact the EDO's office to discuss the Panel's question on how to include whether the Billie Garde response to 10 CFR 2.206 Petition should be addressed

J. Hopkins stated that the response to the 2.206 Petition will include an acknowledgment of the letter from Ms. Garde.

**Item 200** (Open) - Draft a TIA letter to send to B. Ruland regarding whether the proposed modification that the licensee is performing to the high pressure injection pumps is sufficient to address the design deficiency

A teleconference was held on July 14, 2003, with the licensee to get an updated status.

**Item 201** (Open) - Coordinate with L. Gerke and ask her to call Rep. Kaptur's staff regarding the June 13, 2003, letter from Chairman Diaz to Kaptur. The purpose of the call would be to update Rep. Kaptur on the recent issues with the HPI Pumps and provide information on NRC actions to review LER 2003-02

The Panel determined that when the communication plan is developed for the preliminary significance determination for HPI Pump issue that we consider interfaces with those people who receive the letter.

8. Discuss Plant Status and Inspector Insights and Emergent Issues List

The Panel discussed plant status and inspector insights and emergent issues list.

9. Discuss ROP Sample Status 2<sup>nd</sup> quarter 2003

S. Thomas led a discussion on the ROP Sample Status for the 2<sup>nd</sup> quarter 2003. The Panel agrees with the status and approach going forward.

10. Discuss New/Potential Licensing Issues

The Panel discussed new/potential licensing issues. J. Hopkins mentioned a possibility that the licensee may need a license amendment for one of the modifications planned for the electrical transient analysis program project.

11. Discuss Work NRC Research Is Performing Related to PWR Sump Performance

The Panel discussed work NRC research is performing related to PWR sump performance. J. Hopkins will inform Davis-Besse during the weekly call that issues coming out of the work doesn't apply to Davis-Besse at this time.

12. Discuss Items for Licensee Weekly Calls

The Panel discussed items for the weekly calls with the licensee.

13. Discuss/Update Milestones and Commitments

The Panel reviewed and discussed upcoming milestones and commitments.

14. Discuss Restart Checklist Item 2.b: "Containment Vessel Restoration Following Reactor Pressure Vessel Head Replacement"

The Panel reviewed and closed this Checklist Item.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

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; 04/03 - Completion of Phase 3 sampling plan scheduled for late April - discuss again then; 04/08 - Revisit in June 2003; 07/01 - Nozzle specimen removal begins tomorrow.</p>

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
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 <sup>nd</sup> 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; 07/01 - Christine to request two month extension of due date.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
136	<p>NRR acceptance of NOP criteria and method (01/03)</p> <p>J. Grobe to send an email week of 05/19 with question of whether the licensee's method and criteria are adequate to address the TS for zero unidentified reactor coolant leakage from the reactor coolant system. By the end of the week of 05/19 NRR to formulate a proposed position for discussion. The position by NRR will be discussed by the Panel during the 05/27 0350-Panel meeting. After discussing on 05/27 the issue is to be presented internally within the NRC for dissenting views (05/27 - Reopen)</p>	W. Ruland/J. Grobe	<p>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 consensus 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; 3/25 - Staff to be polled after 4/4/03 meeting in headquarters, and meeting should address whether a rational basis exists that the bottom head is not leaking, and whether a critical flaw size will not appear during the next operating cycle; 04/08 - J. Hopkins writing mtg summary for 4/4, licensee to address additional questions on 4/9 telephone call; 05/16 - Closed; 05/27 - Reopen; 06/17 - Meeting held in HQ the week of June 9. R. Barrett et. al. discussed that the licensee has no basis that the nozzles are not cracked. May need a TS Amendment. The next step is to engage the licensee; 07/01 - Phone call held 6/30 with licensee. Licensee to provide written response to John Jacobson.</p>
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.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
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; 07/01 - Discussed;
156	Read Generic Safety Issue-191, "Assessment of Debris Accumulation on PWR Sump Pump Performance" (01/09)	C. Lipa	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; 03/04 - activity to be reassigned to Reactor Engineer who will close sump LER; 04/08, D. Hills to discuss with K. Coyne and A. Dunlop work assignments; 06/17 - K. Coyne requested to review the emergency sump modification against the Bulletin 2003-01; 7/1 - Discussed and reassigned lead.
174	Review 2/4 transcript for Mr. Witt's recommendations (2/18)	R. Lickus	7/1 - In review
178	Determine the type of backlog assessment that will be performed and by whom. Two attributes need to be considered: (1) the capability of the licensee to manage the backlog in an operating environment; and (2) the impact of the backlog on equipment reliability. (03/04)	C. Lipa	

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Item Number	Action Item (Date generated)	Assigned to	Comments
186	Add Dennis Kucinich to the standard distribution list on documents for Davis-Besse. Then remove Dennis Kucinich from distribution 90 days after the <b>final</b> NRC reply to his 10 CFR 2.206 Petition is signed out. (04/22)	A. Saso	
188	Arrange for Radiation Protection Inspection to evaluate stability in Radiation Protection organization effectiveness. An inspection plan is to be drafted and presented to the Panel for approval, including applicable Restart Action Matrix items, for an inspection to be conducted in the July 2003 time frame. (04/29)	K.Riemer	07/1 - Discussed - Request Mr. Riemer provide planner to panel members directly for review ASAP; 07/15 -Plan approved, action closed.
189	Collect Information on the Regulatory Approach to Research the Process to Ensure Proper Regulatory Footprint upon Restart (05/16)	B.Ruland	05/27-Discussed; 07/01 - The Millstone Order was reviewed and the approach is not appropriate. Bill also look at the South Texas approach; 07/15 -Discussed, title changed.
191	Prepare Questions and Answers (Qs and As) once the GT 221 letter to Rep. Kucinich is issued to ensure consistent communications regarding how the NRC articulates issues to the public. (05/16)	C.Lipa/ A.Mendiola	07/15 - Item captured by Action Item 197- closed.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
193	Consider TIA on an issue pertaining to 10 CFR 50 Appendix R Section III-L, "Alternative and Dedicated Shutdown Capability." (05/27)	T. Mendiola	A concern was identified for the shutdown function performance goal of maintaining reactor coolant level. An NRC safety evaluation report issued in 1991 apparently allows the licensee to maintain reactor coolant level above the top of active fuel instead of maintaining level within the range of indication in the pressurizer; 7/1 - John Hannon to determine if a TIA is necessary or the issue is moot.
194	Add to the Restart Checklist the licensee's Technical Specification Amendment Request to relocate the high pressure injection and low pressure injection subsystems flow balance testing requirement in Technical Specification 4.5.2.h to the Updated Safety Analysis Report Technical Requirements Manual. (06/17)	D. Passehl	6/24 - Approved the concept of adding the licensee's Technical Specification Amendment Request to the Restart Checklist. A letter has been drafted and will be routed for concurrence; 07/01 - Letter in concurrence chain; 07/15 - Action was complete with issuance of Restart Checklist dated 07/02/03 - closed
195	Review worker fatigue issues at the site during the current inspection period. (06/17)	S. Thomas	6/24 - J. Grobe took action to contact L. Myers and discuss
196	Determine whether the shift manager is qualified to fulfill the shift engineer position in an emergency and whether there is an adverse impact on the licensee's emergency procedure Implementation. (06/17) Item re-opened at 7/1 Panel meeting.	S. Thomas	6/24 - Closed; 7/1 - Re-opened - see meeting minutes for additional information.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
197	Develop a communication plan with restart Qs and As. (06/17)	A. Mendiola	6/24 - Lead changed
198	Call Billie Garde on the section of the letter regarding "missed opportunities." The specific paragraph includes the statement: "Mr. Siemasko has identified at least twenty-three separate "missed opportunities" that could have prevented the propagation of G9 nozzle crack during the 14 years prior to 12 RFO in the spring of 2000." <i>This action is due June 27.</i> (06/20)	B. Clayton	07/01 - Discussed; 07/15 - closed.
199	Contact the EDO's office to discuss the Panel's question on how to include whether the Billie Garde response to 10 CFR 2.206 Petition should be addressed. (06/20)	J. Hopkins	6/24 - Revised description; 07/01 - Discussed; 07/15 - The response to the 2.206 Petition will include an acknowledgment of the letter from Ms. Garde - closed
200	Draft a TIA letter to send to B. Ruland regarding whether the proposed modification that the licensee is performing to the high pressure injection pumps is sufficient to address the design deficiency. (06/20)	C. Lipa	6/24 -The Panel assigned D. Hills with action to send an email next week with summary of the concept; 07/01 - On hold pending a licensee decision on whether to pursue this option or replace the pumps; 07/15 - A teleconference was held on July 14, 2003, with the licensee to get an updated status.

**DAVIS-BESSE OVERSIGHT PANEL "OPEN" ACTION ITEM LIST**

Item Number	Action Item (Date generated)	Assigned to	Comments
201	Coordinate with L. Gerke and ask her to call Rep. Kaptur's staff regarding the June 13, 2003, letter from Chairman Diaz to Kaptur. The purpose of the call would be to update Rep. Kaptur on the recent issues with the HPI Pumps and provide information on NRC actions to review LER 2003-02.(06/20)	T. Mendiola	6/24 - The Panel determined that when the communication plan is developed for the preliminary significance determination for HPI Pump issue that we consider interfaces with those people who receive the letter; 07/15 - Discussed.
202	Put a discussion of the actions the NRC took in reviewing concerns involving the reactor coolant pumps in the August 2003 newsletter. (07/15)	J. Strasma	
203	Put a discussion of the actions the NRC is taking to respond to the emails and letters from concerned citizens regarding Davis-Besse in the August 2003 newsletter. This includes responding to the citizens and Amy Rider with a letter including a copy of the most recent newsletter. (07/15)	J. Strasma	
204	Send an email to E. Merschoff and L. Chandler inquiring how the Panel should handle the correspondence in ADAMS. (07/15)	J. Grobe	

**RAM Item No.** - E-34

**Closed:** Y

**Date of E-Mail** - 07/01/03

**Author** - Gurdziel to Lipa (& Telecon to Grobe)

**Description of Issue** - Respond to E-mail concerning the adequacy of the new sump based on Gurdziel's review of report 03-06.

**Restart Checklist Item:** N/A

**Description of Resolution** - Jack Grobe spoke with Tom Gurdziel by phone on July 1, 2003, and answered all his questions on the sump report (Inspection Report No. 03-06). During the call, which Mr. Gurdziel initiated, Mr. Gurdziel stated that he was satisfied with the answers he received and had no further questions. No further action is necessary.

**RAM Item No.** - LER-06

**Closed:** Y

**Description of Issue** - Review and Evaluate EDG Missile Shield LER. See also Condition Report 02-5590 and URI-43.

**Description of Resolution** - This item was closed in Inspection Report 50-346/02-19 to an Unresolved Item. For the purposes of tracking, this item is closed, and the details will be discussed in the closure of URI-43 in this RAM, which was assigned to the Corrective Action Team Inspection (CATI) for resolution.

**Reference Material** - Inspection Report 50-346/02-19.

**RAM Item No.** - URI-39

**Closed:** Y

**Description of Issue** - Failure to adequately evaluate radiological hazards (White Finding).

**Description of Resolution** - A supplemental team inspection was conducted in accordance with Inspection Procedure 95002, "Inspection For One Degraded Cornerstone or Any Three White Inputs In a Strategic Performance Area," to assess the licensee's root cause evaluations and corrective actions for the two White findings in the occupational radiation safety cornerstone. In addition, relevant sections of Inspection Procedure 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input" were used as guidance during this inspection. The purpose of the supplemental inspection was to: (1) provide assurance that the root and contributing causes for the individual White findings in the occupational radiation safety area and the collective performance which resulted in the degraded cornerstone were understood; (2) independently assess the extent of condition and generic implications of these performance issues; and (3) provide assurance that the corrective actions were sufficient to prevent recurrence. The team concluded that the licensee's root cause evaluations for the White performance issues were completed using systematic techniques, were conducted at the appropriate depth, and adequately identified the primary and contributory causes of the issues. The NRC also

concluded that the licensee's corrective action plans were adequate to address the root and contributing causes that were identified in the licensee's evaluation so as to prevent recurrence. Additionally, the team determined that significant progress had been made to improve the licensee's radiation protection program. The licensee's analyses of the White performance issues determined that inadequate work direction and management systems, including problems with radiation protection management oversight, were the root causes of the performance problems, and recent changes have been made in radiation protection management. The team did not identify any significant concerns associated with the current radiation protection program's effectiveness, or significant problems related to the licensee's root cause evaluations for the radiation protection performance problems.

**Reference Material** - DRS Inspection Report No. 50-346/03-08 (ADAMS Accession No. ml031500693).

**RAM Item No.** - URI-40

**Closed:** Y

**Description of Issue** - Failure to obtain timely and suitable measurements (White Finding).

**Description of Resolution** - A supplemental team inspection was conducted in accordance with Inspection Procedure 95002, "Inspection For One Degraded Cornerstone or Any Three White Inputs In a Strategic Performance Area," to assess the licensee's root cause evaluations and corrective actions for the two White findings in the occupational radiation safety cornerstone. In addition, relevant sections of Inspection Procedure 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input" were used as guidance during this inspection. The purpose of the supplemental inspection was to: (1) provide assurance that the root and contributing causes for the individual White findings in the occupational radiation safety area and the collective performance which resulted in the degraded cornerstone were understood; (2) independently assess the extent of condition and generic implications of these performance issues; and (3) provide assurance that the corrective actions were sufficient to prevent recurrence. The team concluded that the licensee's root cause evaluations for the White performance issues were completed using systematic techniques, were conducted at the appropriate depth, and adequately identified the primary and contributory causes of the issues. The NRC also concluded that the licensee's corrective action plans were adequate to address the root and contributing causes that were identified in the licensee's evaluation so as to prevent recurrence. Additionally, the team determined that significant progress had been made to improve the licensee's radiation protection program. The licensee's analyses of the White performance issues determined that inadequate work direction and management systems, including problems with radiation protection management oversight, were the root causes of the performance problems, and recent changes have been made in radiation protection management. The team did not identify any significant concerns associated with the current radiation protection program's effectiveness, or significant problems related to the licensee's root cause evaluations for the radiation protection performance problems.

**Reference Material** - DRS Inspection Report No. 50-346/03-08 (ADAMS Accession No. ml031500693).

**RAM Item No.** - NCV-02

**Closed:** Y

**Description of Issue** - Failure to provide acceptance criteria or requirements to follow inspection plans used for the extent of condition inspections of systems in containment.

**Description of Resolution** - As a corrective action for this issue, the licensee issued three procedures (EN-DP-01500, "Reactor Vessel Inspection Procedure;" EN-DP-01501, "Inspection of RCS Alloy 600 Components/Welds, Threaded/Bolted Connections and Targets;" and EN-DP 01502, "Containment Area Inspections") to control the inspection activities inside containment. These procedures contained appropriate instructions and acceptance criteria, and were classified as safety-related. These procedures contained requirements to confirm visual quality requirements during the inspection (e.g., discern lower case letters of 0.158 inches in height printed on a visual acuity "VT-2" card at six feet under a minimum of 15 foot candles of illumination). The licensee inspectors identified new areas of corrosion/boric acid deposits on components during inspections using these procedures, which had not been previously identified. This indicated a more thorough licensee inspection effort for SSCs under the DBCHAP than that previously completed under the "Containment Boric Acid Extent of Condition Plan." The boric acid or corrosion deposits observed on components by the NRC inspectors within containment (including the reactor vessel) had, in each case, been identified and documented by the licensee staff during these inspections. Therefore, the NRC inspectors concluded that the licensee had taken effective corrective actions to address the lack of inspection quality and thoroughness associated with implementation of the original licensee plans to inspect SSCs within containment.

**Reference Material** - DRS Inspection Report No. 50-346/02-12 (ADAMS Accession No. ml023370132).

**RAM Item No.** - NCV-03

**Closed:** Y

**Description of Issue** - Failure to adequately train personnel for VT-2 certification to perform containment area extent of condition walkdowns.

**Description of Resolution** - As a corrective action for this issue, the licensee developed a new standard to qualify/certify personnel as "Boric Acid Corrosion Control Inspectors." This new standard required 60 hours of relevant work experience. The NRC inspectors reviewed licensee certification packages for 14 certified Boric Acid Corrosion Control Inspectors and noted that these personnel typically had extensive experience and/or previous training/certification in several nondestructive examination methods. The licensee trained and certified over 20 contract personnel to augment existing staff members in performing these inspections. The NRC inspectors observed the classroom training and reviewed written examinations administered to the licensee contract inspectors. The training scope and depth was more extensive than that used in the original VT-2 Certification Process. Licensee staff had to pass a General and Specific written examination intended to meet qualification requirements for an ASME Code VT-2 visual examination. Additionally, licensee staff were given in-depth training and tested on the procedural requirements and expectations for the conduct of the boric acid/corrosion inspections. Further, licensee staff had to pass a practical examination on actual areas/components in containment. This practical examination included a standardized checklist of criteria which needed to be demonstrated by the student for a passing

grade. Twenty-two licensee staff initially failed certification tests, which indicated that this series of certification tests was challenging. Most of these personnel were provided additional training and satisfactorily completed the certification process. The certification for each individual was recorded in a Job Familiarization Guideline that had specific requirements for each type of inspector (mechanical, structural, electrical) and was unique to each procedure used for conducting inspection of components for boric acid/corrosion. The NRC inspectors concluded that the licensee had developed a well defined training standard with appropriate training and testing for the Boric Acid Corrosion Control Inspectors who conducted inspections of SSCs within containment. This corrective action adequately addressed the previous NRC finding associated with inadequate training of licensee support personnel for this activity.

**Reference Material** - DRS Inspection Report No. 50-346/02-12 (ADAMS Accession No. ml023370132).

**RAM Item No.** - NCV-04

**Closed:** Y

**Description of Issue** - Failure to placard vehicles used to transport radioactive materials.

**Description of Resolution** - The panel reviewed this NCV and determined that no added followup was needed. The issue was in the licensee's corrective action program and was being addressed commensurate with its safety risk. This item is closed.

**RAM Item No.** - NCV-05

**Closed:** Y

**Description of Issue** - Failure to conduct adequate surveys of workers prior to leaving the site.

**Description of Resolution** - This related to inadequacies in the radiation protection program that allowed individuals to leave the site with radiological contamination present on the individuals. As a result of this and the two white findings identified in other inspections, a supplemental team inspection was conducted in accordance with Inspection Procedure 95002, "Inspection For One Degraded Cornerstone or Any Three White Inputs In a Strategic Performance Area." In addition, relevant sections of Inspection Procedure 95003, "Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input" were used as guidance during this inspection. The purpose of the supplemental inspection was to: (1) provide assurance that the root and contributing causes for the collective performance which resulted in the degraded cornerstone were understood; (2) independently assess the extent of condition and generic implications of these performance issues; and (3) provide assurance that the corrective actions were sufficient to prevent recurrence. The team concluded that the licensee's corrective action plans were adequate to address the root and contributing causes that were identified in the licensee's root cause evaluation so as to prevent recurrence. Additionally, the team determined that significant progress had been made to improve the licensee's radiation protection program. The team did not identify any significant concerns associated with the current radiation protection program's effectiveness, or significant problems related to the licensee's root cause evaluations for the radiation protection performance problems.

**Reference Material** - DRS Inspection Report No. 50-346/03-08 (ADAMS Accession No. ml031500693).

**RAM Item No.** - NCV-15

**Closed:** Y

**Description of Issue** - Failure to properly control access to locked high radiation areas (LHRAs) as required by Technical Specifications.

**Description of Resolution** - The panel determined that no additional follow-up was necessary. The licensee had promptly corrected the problem once it had been identified by the NRC inspector and the problem had been entered into the licensee's corrective action system to ensure corrective actions would prevent recurrence. The panel considers this item closed.

**Reference Material** - DRS Inspection Report No. 50-346/03-08 (ADAMS Accession No. ml031500693).

**RAM Item No.** - NCV-16

**Closed:** Y

**Description of Issue** - Failure to Respond to Dosimeter Alarms.

**Description of Resolution** - The panel determined that no additional follow-up was necessary. The licensee had entered the problem into the licensee's corrective action system to ensure corrective actions would be implemented that would prevent recurrence. The panel considers this item closed.



## LICENSEE EFFECTIVENESS IN IDENTIFICATION AND RESOLUTION OF PROBLEMS

### Objectives:

1. Determine that the licensee's Radiation Protection organization can identify, characterize, and prioritize problems involving both occupational and public radiation safety.
2. Evaluate the licensee's processes, such as the corrective action program, for resolving these identified problems.
3. Define the licensee's radiation protection management's role in problem identification and resolution.
4. Evaluate the licensee's ability to identify repetitive deficiencies and/or significant individual deficiencies in the Radiation Protection organization.
5. Evaluate the licensee's ability to comply with NRC regulations relative to 10 CFR Part 20.

**ROP SAMPLE STATUS 2nd Quarter 2003**

PROCEDURE NUMBER	INSPECTION PROCEDURE	SAMPLES COMPLETED (2 <sup>ND</sup> QTR)	SAMPLES COMPLETED (2003)	MINIMUM REQUIRED (PER YEAR)
71111.01	Adverse Weather Protection	1	1	3
71111.04Q	Equipment Alignment	3	5	11
71111.05 Q	Fire Protection	7	12	24 (6/qtr)
71111.06	Flood Protection	2	2	2
71111.07	Heat Sink Performance	0	0	1
71111.11	Licensed Operator Requalification	0	0	1/qtr
71111.12Q	Maintenance Effectiveness	5	6	8
71111.13	Maint. Risk Assessnt & Emergent Work	7	12	15
71111.14	Personnel Perf. During Non-Routine Evols.	3	5	6
71111.15	Operability Evaluations	4	8	15
71111.16	Operator Workarounds	1 1	1 1	As required 2 (Cum. Effect)
71111.17	Permanent Plant Modifications	0	0	1
71111.19	Post Maintenance Testing	3	7	20
71111.20	Refueling and Outage Activities	0	0	TBD
71111.22	Surveillance Testing	2	10	18
71111.23	Temporary Plant Modifications	2	3	5
71114.06	Drill Evaluation	2	2	9 hours
71151	Performance Indicators	0	0	TBD
71152	Problem Identification and Resolution	0	0	3
71153	Event Followup	2	5	as required

For the second quarter, the samples required to verify the licensee progress toward restart matched up pretty closely with what the ROP requires for samples. This data reflects the following:

- We were one sample short for 71111.11. Operator requalification will more appropriately be looked at closer to restart.
- Most of the performance indicators that the residents evaluate are meaningless for Davis-Besse. We do plan on looking at those that do provide meaningful data (Safety System Unavailability for Decay Heat Removal and Emergency AC, and Safety System Functional Failures).
- No hours have been charged to 71111.20 because the various samples that have been selected were better suited for other inspection procedures. This does not preclude its use in the future.
- The residents have not utilized 71152 due to the specific focus on the licensee's corrective action program by a number of 0350 team inspections.

During the 2<sup>nd</sup> Quarter, the resident staff used approximately 264 hours DIE utilizing ROP Inspection Procedures, 289 hours on Plant Status, approximately 180 hours supporting the 0350 process, and approximately 48 hours evaluating issues utilizing the resident inspectors special inspection procedure (93812 - resident inspection of restart issues).

Due to the special status of Davis-Besse as an 0350 plant, the resident staff focus was not on completing the ROP sample requirements, but to use the inspection procedures, in conjunction with W90086 (0350) and IP 93812 (resident special inspection of restart issues), to inspect the required activities to assess the licensee progress toward being able to restart the plant.