



# **United States Nuclear Regulatory Commission**

---

Oconee Regulatory Performance Meeting  
Discuss Results of Supplemental Inspection

October 4, 2004

# Agenda

---

- Introduction /Opening Remarks (L. Wert – NRC)
- Licensee Introduction/ Opening Comments
- Reactor Oversight Process and Performance Discussion
- Licensee Response
- Questions
- Closing Comments

# Oconee Regulatory Performance Meeting

## October 4, 2004

### MITIGATING SYSTEM WHITE FINDINGS

- The first White finding involved the inadequate installation of electrical connectors on the Unit 3 high pressure injection (HPI) pump emergency power supply cable from the auxiliary service water switchgear. The NRC concluded that vendor's written instructions for attaching the electrical connectors on power supply cable were properly implemented.
- The second White finding involved pressurizer ambient heat losses in all three Oconee units exceeding the capacity of the pressurizer heaters powered from the standby shutdown facility (SSF).

## Exhibit 5 - ACTION MATRIX

		Licensee Response Column	Regulatory Response Column	Degraded Cornerstone Column	Multiple/Repetitive Degraded Cornerstone Column	Unacceptable Performance Column	IMC 0350 Process
<b>RESULTS</b>		All Assessment Inputs (Performance Indicators (PIs) and Inspection Findings) Green; Cornerstone Objectives Fully Met	One or Two White Inputs (in different cornerstones) in a Strategic Performance Area; Cornerstone Objectives Fully Met	One Degraded Cornerstone (2 White Inputs or 1 Yellow Input) or any 3 White Inputs in a Strategic Performance Area; Cornerstone Objectives Met with Moderate Degradation in Safety Performance	Repetitive Degraded Cornerstone, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or 1 Red Input; Cornerstone Objectives Met with Longstanding Issues or Significant Degradation in Safety Performance	Overall Unacceptable Performance; Plants Not Permitted to Operate Within this Band, Unacceptable Margin to Safety	Plants in a shutdown condition with performance problems placed under the IMC 0350 process
<b>RESPONSE</b>	Regulatory Performance Meeting	None	Branch Chief (BC) or District Director (DD) Meet with Licensee	DD or Regional Administrator (RA) Meet with Licensee	RA (or EDO) Meet with Senior Licensee Management	Commission meeting with Senior Licensee Management	RA (or EDO) Meet with Senior Licensee Management
	Licensee Action	Licensee Corrective Action	Licensee root cause evaluation and corrective action with NRC Oversight	Licensee cumulative root cause evaluation with NRC Oversight	Licensee Performance Improvement Plan with NRC Oversight		Licensee Performance Improvement Plan / Restart Plan with NRC Oversight
	NRC Inspection	Risk-Informed Baseline Inspection Program	Baseline and supplemental inspection procedure §5001	Baseline and supplemental inspection procedure §5002	Baseline and supplemental inspection procedure §5003		Baseline and supplemental as practicable, plus special inspections per restart checklist.
	Regulatory Actions <sup>1</sup>	None	Supplemental inspection only	Supplemental inspection only	10 CFR 50.54(i) - Interim License	Order to Modify, Suspend, or Revoke Licensed Activities	CAL/order requiring NRC approval for restart.
<b>COMMUNICATION</b>	Assessment Letters	BC or DD review/sign assessment report (w/ inspection plan)	DD review/sign assessment report (w/ inspection plan)	RA review/sign assessment report (w/ inspection plan)	RA review/sign assessment report (w/ inspection plan)		N/A. RA (or 0350 Panel Chairman) review/ sign 0350-related correspondence
	Annual Public Meeting	SRI or BC Meet with Licensee	BC or DD Meet with Licensee	RA (or designee) Discuss Performance with Licensee	RA or EDO Discuss Performance with Senior Licensee Management		N/A. 0350 Panel Chairman conduct public status meetings periodically
	Commission Involvement	None	None	None	Plant discussed at AARM	Commission Mtg with Senior Licensee Management	Commission meetings as requested, restart approval in some cases.
<b>INCREASING SAFETY SIGNIFICANCE</b> →							

Note 1: Other than the CAL, the regulatory actions for plants in the Multiple/Repetitive Degraded Cornerstone column and IMC 0350 column are not mandatory agency actions. However, the regional office should consider each of these regulatory actions when significant new information regarding licensee performance becomes available.

Note 2: The IMC 0350 Process column is included for illustrative purposes only and is not necessarily representative of the worst level of licensee performance. Plants under the IMC 0350 oversight process are considered outside the auspices of the ROP Action Matrix. See IMC 0350, "Oversight of Operating Reactor Facilities in a Shutdown Condition with Performance Problems," for more detail.

## INSPECTION RESULTS

- Corrective actions completed and those planned are appropriate to resolve the deficiencies associated with the White Findings
- A lack of thoroughness in the corrective action process for the two White findings limited the initial response to the findings and the associated Degraded Mitigating Systems Cornerstone
- Duke did not adequately review the potential broader implications from its Level II assessment relative to the design control measures for the inadequate pressurizer heater calculation
- The initial commonality review for the two White findings was not of sufficient depth to appropriately assess the ‘unique systems’ considerations and whether similar problems existed
- Duke subsequently performed a more comprehensive extent of condition review through several initiatives