



Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

February 23, 2005

David N. Graves, Chief
Project Branch B
Division of Reactor Projects
United States Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4006

SUBJECT: RIVER BEND STATION'S REVEALING INSPECTION REPORT

Dear Mr. Graves:

By letter dated February 14, 2005, you transmitted NRC inspection report 50-458/2004005 to the licensee of the River Bend Station. This inspection report documented the NRC's inspections conducted at River Bend between October 1st and December 31st. The Summary of Findings presented eight Green findings. The NRC classified five of the eight Green findings as "self-revealing." However, the first Green finding involving the trip signal generated during troubleshooting of the transformer sudden overpressure protection circuit that resulted in a loss of offsite power to the Division II engineered safety features transformer was actually also "self-revealing." Likewise, the third Green finding involving the root cause of the April 21, 2001, reactor scram not being corrected and causing another reactor scram on September 22, 2003, was actually also "self-revealing." They might be considered NRC-identified had your inspectors discovered the tagging error or root cause mis-identification before these events.

In any case, the majority of the Green findings in this inspection report (either 62.5% or 87.5% depending on the semantics) were "self-revealing," meaning that neither the licensee's personnel nor the NRC's inspectors found them. This is very troubling. While it is great that NRC inspectors logged the violations that "self-revealed" themselves during the 13 week period, a more impressive report would have reflected an aggressive inspection effort that prevented tomorrow's events rather than dutifully writing up yesterday's events.

A closer examination of one of the Green findings further illustrates the weakness of the NRC's inspection effort. The aforementioned Green finding about the faulty root cause determination for the April 21, 2001, reactor scram contained this NRC statement: "*The inspectors determined that the failure by the licensee to adequately identify the root cause of the April 21, 2001, event and to take effective corrective action to prevent electrostatic arcing from affecting the primary and backup spend probes, was a performance deficiency.*" Indeed, no doubt about it.

But this NRC inspection report makes no reference to NRC inspection report 50-458/200102 dated July 13, 2001. Section 1R14 of that earlier NRC inspection report stated: "*The inspectors evaluated the initiating causes of the RR pump trip and [April 21, 2001] reactor scram (CR-2001-0479, trip of RR Pump A and CR-2001-0523, reactor scram and turbine trip). ... No findings of significance were identified.*" Thus, NRC inspectors also looked at the root cause of the April 21, 2001, reactor scram and also failed to properly identify it. Another performance deficiency, this time on the NRC's part.

February 23, 2005

Page 2 of 2

The point I am laboring to make is that “self-revealing” findings ought to be opportunities for the NRC to re-assess the efficacy of its inspection effort. Each and every “self-revealing” finding should be accompanied by formal, written answers to the following questions:

1. Have prior NRC inspections examined this area?
2. If yes, should those inspections have identified the underlying problem that culminated in this “self-revealing” finding?
3. If no, should the inspection program be expanded/revise to periodically examine this area so as to find any undetected problems?

This feedback would accelerate risk-informing the inspection program. For example, an acceptable answer to Question #3 could be that inspection program does not need to be revised to periodically examine the area because either the probability of occurrence of the finding is so low or its consequences are so low that diverting inspection resources from other areas is not warranted. For another example, an acceptable answer to Question #2 might be that sufficient inspection resources are devoted to examining the area, but those resources could and should be more effectively applied.

NRC inspectors are talented, capable individuals. They can and should perform a more useful function than “event loggers.” The NRC’s inspection program needs to be re-tooled so the inspectors’ talents are more focused on producing findings that prevent tomorrow’s events rather than on the more menial task of documenting yesterday’s “self-revealing” events.

Sincerely,

A handwritten signature in black ink that reads "David A. Lochbaum". The signature is written in a cursive, flowing style.

David Lochbaum
Nuclear Safety Engineer
Washington Office