

# NRC INSPECTION MANUAL

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## INSPECTION PROCEDURE 90700

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### FEEDBACK OF OPERATIONAL EXPERIENCE INFORMATION AT OPERATING POWER REACTORS

PROGRAM APPLICABILITY: 2515

SALP FUNCTIONAL AREA: ENGINEERING (ENG)

#### 90700-01 INSPECTION OBJECTIVE

To determine the effectiveness of licensees' programs to assess and feed back to plant staff operational experience information pertinent to plant safety originating both within and outside the licensees' organizations.

#### 90700-02 INSPECTION REQUIREMENTS

02.01 Program verification. Verify the existence of a licensee program for tracking and accounting operational experience information.

02-02 Procedure Review. Review and determine the effectiveness of the procedures utilized by the licensee to implement the operational experience feedback program. Determine that the licensee's procedures that implement the operational experience program:

- a. Identify organizational responsibilities for review and prioritization of operational experience information, the feedback of pertinent operational experience information to operators and other personnel, and the incorporation of such information into training and retraining personnel.
- b. Identify the administrative and technical steps necessary in translating recommendations by the operational experience information assessment group into plant actions (e.g. procedures, lesson plans, or design changes).
- c. Identify the recipients of various categories of information from operational experience information or otherwise provide

means through which such information can be readily related to the job functions of the recipients.

- d. Provide assurance that affected personnel are aware of and understand operational experience information of sufficient importance that should not wait for a plant procedure change or emphasis through routine training and retraining programs.

- e. Provide assurance that conflicting or contradictory information is not conveyed to operators and other personnel until resolution is reached.
- f. Provide for periodic internal audits to assure that the feedback program functions effectively at all levels.

02.03 Program Assessment. Determine the overall effectiveness of the licensee's operational experience feedback process by selecting and following up operational experience reports received, reviewed, and dispositioned by the licensee.

- a. Verify the receipt, review, and disposition by the licensee of six known operational experience information reports.
- b. Select at least six diverse operational experience information reports pertinent to the facility and received by the licensee. At least one of the six reports selected shall be from a 10 CFR Part 21 notification.
  - 1. Determine the completeness and timeliness of the licensee's review and assessment of the selected operational experience information reports.
  - 2. Determine the appropriateness, quality, and timeliness of corrective actions -- including training -- taken or planned by the licensee, if corrective actions (including training) were necessary or appropriate.
  - 3. Verify the completion of corrective actions by reviewing procedures, lesson plans, and design changes.
  - 4. To assess the effectiveness of the licensee's corrective actions compare the licensee's current deficiency/problem reports (both performance and hardware issues) to the operational experience information reports selected above to identify whether similar problems continue to occur.

## 90700-03 INSPECTION GUIDANCE

### General Guidance

NUREG-0737, Item I.C.5, required licensees to develop procedures to feedback operational experience information to plant staff. The NRC staff, in Generic Letter 82-04, indicated that participation by licensees in the Significant Event Evaluation and Information Network (SEE-IN) program administered by the Institute of Nuclear Power Operations (INPO) would enhance a licensee's ability to meet the intent of NUREG-0737, Item I.C.5, but would not relieve a licensee from taking those actions specific to the licensee's nuclear unit which result from an evaluation of operational experience information. INPO periodically evaluates licensees' participation in the SEE-IN program. Inspectors should be cognizant of INPO's activities in this area.

For review of INPO documents, the inspector should not reference

specific documents nor discuss INPO findings, recommendations, and corrective actions in the inspection report. The purpose of this review is to verify the adequacy of the licensee's processes for implementing its program for operational feedback.

The use of INPO information is discussed in a revised Memorandum of Agreement between INPO and the NRC dated September 17, 1993. Additional guidance on the use of INPO information can also be found in Inspection Procedure 71707, "Operational Safety Verification."

For the purposes of this inspection procedure, operational experience information reports are considered to be:

- NRC bulletins, generic letters, and information notices.
- Reports generated by industry-affiliated organizations (Such as significant event reports [SER's], significant event notifications [SEN's], and significant operating experience reports [SOER'S] generated as a result of the INPO SEE-IN process).
- 10 CFR Part 21 and related reports (such as germane to safety reports issued by General Electric Company) generated by vendors and other licensees.
- Other vendor related reports (such as service information letters [SIL's] and rapid information communication service information letters [RICSIL'S] issued by General Electric Company).
- Reports resulting from employee concern programs or from concerns brought by external persons or organizations.
- Reports resulting from internally identified problems.
- Other reports, as appropriate.

Headquarters should be notified if information is developed that may indicate the existence of a generic safety issue that may not be known to headquarters. Notifications can be made through Inspection Manual Chapter (IMC) 0230, "Morning Report," or (IMC) 0970, "Potentially Generic Items Identified by Regional Offices." When providing information to headquarters, be sensitive to pertinent information that may not be readily available in headquarters.

NRR may also request, at times, that specific operational experience information reports (such as bulletins and generic letters) be inspected at the site. In such cases, guidance to perform such inspections will be transmitted through a temporary instruction (TI).

### Specific Guidance

No specific guidance provided.

#### 90700-04 INSPECTION RESOURCES

Direct inspection resources necessary to complete this inspection procedure are estimated to be 12 hours per reactor facility.

#### 90700-05 REFERENCES

NUREG-0737, "Procedures for Feedback of Operating Experience to Plant Staff," Item I.C.5.

Generic Letter 82-04, "Use of SEE-IN Program."

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