

REACTOR OVRSIGHT PROCESS
NEI ROP TASK FORCE (ROPTF) ACTION LIST – STATUS APRIL 26, 2005

The following is the current listing of the NEI ROPTF Action Items:

OPEN Action Items	Description	Due Date
04-05	<p><u>Safety System Functional Failure (MS05) Reconciliation Project</u> Task: NRC provided the docket number and corresponding Licensee Event Reports (LER) for which the NRC's contractor assessed the LER as being a Safety System Functional Failure (SSFF: MS05). Industry is reviewing this data against ROP reported data and will provide an analysis of differences. Status: Report has been provided to NRC. NRC still owes the Industry team some illustrative examples to understand how our team evaluated some LERs. NRC to schedule a meeting between report authors and INEEL to discuss findings.</p>	April 2005
04-18	<p><u>Licensee Identified versus Self-Revealing Events</u> Task: NRC to evaluate the MC 0612 criteria on "self identified" versus "self-revealing" Status: Jim Eison is revising 0612, and it will address the issue of licensee-identified items. Jim discussed the revised wording, and it will allow licensees to take credit for daily observations (NRC confirmed that the goal is to encourage licensees to identify and correct issues, and the old guidance did not do that). The draft wording appeared to satisfy licensee concerns. The NRC expects by the end of April for the guidance to be issued in 0612.</p>	April 2005
04-19	<p><u>Resolution of old IE02 FAQs</u> Task: Discussed the seven FAQs (27.3, 28.3, 30.8, 32.3a, 34.6, 36.1, and 36.2) which involve SCRAMS with loss of normal heat removal. Industry proposed in the April meeting that NRC consider dropping these FAQs since (1) they involve specific conflicting guidance in NEI 99-02; (2) NRC has already assessed each scram, sometimes with a special inspection. NRC agreed to review the NEI data and determine next steps. Status: NRC wants to use the new 99-02R3 Appendix E process to evaluate how these items are dispositioned. NRC feels that it is important to disposition these items, even if the item is "old" and the issue has "rolled off" (i.e., the issue would not effect the current PI metrics) and there is no real cost benefit to the meetings. The new process will have licensees come in to defend their FAQs in a public meeting with the staff (Bruce Boger) for the final ruling. NRC queried NEI on how this new process should be implemented (one large meeting for all outstanding FAQs or individual meetings, etc.), including 36.8 and 36.9 [nine total old FAQs]. NEI and NRC will work with the affected licensees to develop the meetings.</p>	April 2005
04-20	<p><u>Maintenance Rule and MSPI</u> Task: White paper from NEI/Industry explaining why it is acceptable to change NUMARC 93-01 to stop monitoring unavailability when subcritical. NRC contact: Steve Alexander Status: NRC evaluating NEI white paper. Steve Alexander has requested comments from industry members of the M rule owners group. NEI confirmed Industry owes NRC data. This also needs to include changing 93-01 to allow not reporting unavailability events of less than 15 minutes if on a list in 99-02 Appendix G. If we don't do this, licensees will have to report them in Maintenance rule and we haven't given them anything.</p>	April 2005

<u>OPEN</u> <u>Action Items</u>	<u>Description</u>	<u>Due Date</u>
04-21	<p><u>MSPI Lessons Learned Evaluation</u></p> <p><u>Task:</u> Industry has requested NRC support a joint "lessons learned" team to examine the MSPI Pilot Program for lessons learned – to improve future management and administration of future PI Pilot Programs and development of future indicators.</p> <p><u>Status:</u> NRC believes it is not an appropriate time to initiate a lessons learned review. NEI agreed to delay any lessons learned project until after MSPI is implemented in January 2006.</p>	Jan 2006
04-23	<p><u>ISFSI Inspections</u></p> <p><u>Task:</u> Industry inquired as to the status of ISFSI facilities within the ROP inspection program.</p> <p><u>Status:</u> NRC management reviewing this issue. NRC is working with NMSS on the basis for significance on spent fuel pools and ISFSI facilities. No significant progress has been made on this issue and no SDP is currently being developed. This item will be checked again for status in 3 months.</p>	June 2005
04-27	<p><u>Safeguards PIs, SDP, and Action Matrix</u></p> <p><u>Task:</u> NRC NSIR is preparing proposals for new PIs for Safeguards cornerstone. NSIR last briefed SPATF that a Commission paper would be released soon on the status of how Security would be handled within ROP framework. NSIR to start attending ROPTF meetings.</p> <p><u>Status:</u> NSIR made a closed-door (non-public) meeting presentation in March 2005 on the status of the Security SDP, potential new Security PIs, and the Commission paper being prepared to describe how Security will be handled within the ROP process and Action Matrix. NSIR expects the Commission paper and decisions to be resolved within the next 60 to 90 days. Once the Commission paper is submitted, NSIR will re-brief the ROP task force on the status. NRC agreed to have NSIR attend future meetings (at least quarterly, but when any significant milestones are achieved), and report on security initiatives on: (1) RIS on how physical protection will be handled within ROP construct; (2) status on development and evaluation of physical protection SDP; (3) status on development of physical protection alternative PIs (which will need to be piloted and evaluated prior to implementation). See closed item 4-22.</p>	May 2005
05-01	<p><u>SDP Timeliness</u></p> <p><u>Task:</u> SDP timeliness has been evaluated by NEI</p> <p><u>Status:</u> NEI will be sending a letter with several recommendations. The letter should be finalized within the next 2 weeks. One recommendation will be to form a joint task force to analyze the SDP process and formulate measures to improve timeliness. This was previously tracked under closed action item 04-04.</p>	April 2005
05-02	<p><u>Credit for Licensee Identified Findings</u></p> <p><u>Task:</u> Jeff Jacobson had previously presented to the committee that NRC couldn't credit licensee self-assessments (in lieu of NRC inspections), yet the premise was based on the "old" definition of licensee-identified – if the definition is being significantly expanded, then those results would change.</p> <p><u>Status:</u> NRC will check with Jeff and this issue will be brought to the next meeting.</p>	April 2005

CLOSED Action Items	Description	Due Date
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04-01	<p><u>RCS Leakage PI (B02)</u> <u>Task:</u> INDUSTRY/NRC to establish task force to explore feasibility of new replacement metric. Closed. <u>Status:</u> August 19 meeting formed a subgroup.</p>	Closed
04-02	<p><u>Steam Generator SDP</u> <u>Task:</u> INDUSTRY- Provide examples of "minor" steam generator issues/results/findings by the March meeting <u>Status:</u> Examples provided. NRC to include appropriate examples in MC 0612 Appendix E.</p>	Closed
04-03	<p><u>Maintenance Rule SDP</u> <u>Task:</u> Provide written comments on the Maintenance Rule SDP by the March meeting. <u>Status:</u> Example/comments provided and NRC to include in final SDP.</p>	Closed
04-04	<p><u>SDP Lessons Learned</u> <u>Task:</u> NRC and Industry brought SDP timeliness examples to the meeting. Industry to evaluate these examples for inclusion as case studies in an SDP workshop devoted to improving SDP timeliness. Industry to review schedule to support a summer workshop. <u>Status:</u> Workshop targeted for mid-July. NRC to confirm dates and NEI to send out letter to APCs announcing workshop. Rescheduled for September.</p>	Closed
04-06	<p><u>Graded Reset of Action Matrix Inspection Findings</u> <u>Task:</u> NRC to provide the resolution (answer) to the graded reset question raised by Industry by the March meeting and in FRN comments on the ROP. <u>Status:</u> NRC provided response. While closed, Industry intends to continue to pursue via other channels.</p>	Closed
04-07	<p><u>NRC Comments on Generic Changes in NEI 99-02 (Revision 3)</u> <u>Task:</u> NRC to provide a listing of sections within NEI 99-02 Rev 2 that contain ambiguous or unclear guidance that the NRC has identified as needing modification when drafting Rev 3 by March meeting. This is to be subsumed within 04-16 when NRC comments received. <u>Status:</u> NRC provided comments to NEI for consideration. The approved FAQs, and a new Appendix E FAQ process.</p>	Closed
04-08	<p><u>Industry Trends Report</u> <u>Task:</u> NRC will provide the Industry Trends Report when available. <u>Status:</u> Received</p>	Closed
04-09	<p><u>Maintenance Rule Workshop</u> <u>Task:</u> NRC is considering holding a workshop on the new Maintenance Rule SDP. Russ Gibbs will go over the issues raised by industry, and determine whether a meeting is appropriate. <u>Status:</u> Russ Gibbs and the NRC has concluded that a workshop is not needed. The MR SDP training module (read and sign) is planned to be given to the Regions shortly. Tony Pietrangelo noted that an opportunity to discuss/present the MR SDP might be at the NEI May 24-25 risk informed regulation workshop. Russ noted that Appendix K will not address external events.</p>	Closed
04-10	<p><u>Ginna FAQ</u></p>	

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- Task:** Licensee to review their previous FAQ and determine if their closing of the MSIVs (early on in the post trip recovery) is still applicable, or if their process has changed and the FAQ is no longer appropriate to apply [Licensee responded that the process has not changed – Open for discussion in May meeting].
Status: Licensee has provided input To be discussed at June 2004 ROP meeting **Closed**
- 04-11** **Revised FAQ Process**
Task: Provided NRC with current draft of FAQ process.
Status: NEI is incorporating comments into Appendix E of NEI 99-02 **Closed**
- 04-12** **Replacement Metric for SCRAMS wlonhr (IE02)**
Task: NRC and Industry to develop a proposed replacement indicator for existing IE02 metric.
Status: . August 19 meeting formed a subgroup. **Closed**
- 04-13** **Fire Protection SDP Review**
Task: NRC Review process for fire protection SDPs has no apparent feedback (to licensees) provided from the NRC panel meetings.
Status: Peter Koltay presented the Fire Protection Appendix F SDP. There has been some feedback from the Regions, and some revisions might be necessary (i.e., how to handle differences in fire brigades). **Closed**
- 04-14** **NRC FAQ Feedback Process**
Task: NRC to examine their internal feedback form process and how it should be included in the FAQ process.
Status: NRC has agreed to initiate FAQs for all NRC feedback forms related to NEI 99-02 interpretation issues. This item will be folded into Action 04-11 upon completion of draft FAQ process. **Closed**
- 04-15** **Mitigating Systems PIs – No Mode**
Task: NRC to prepare an FAQ on how to account for "No Mode" hours in MS04 PI.
Status: This would be a going forward FAQ. **Closed**
- 04-16** **NEI 99-02 Revision 3**
Task: Rev 3 is scheduled for release in April 2005.
Status: NRC will check with their EP counterparts and check with the program office personnel to confirm there are no last minute comments. Awaiting release date. **Closed**
- 04-17** **Mitigating Systems Performance Index**
Task: NRC Commission has directed the NRC staff to work together with industry to resolve the issues associated with the MSPI.
Status: Project approved. No special tracking required. **Closed**
- 04-22** **SECURITY IN THE ROP**
Task: NSIR will be asked to come to present information on the status of including Security issues in security (Action Matrix, PIs, etc.) and the status of the Security SDP.
Status: NRC agreed to have NSIR attend future meetings (at least quarterly, but when any significant milestones are achieved), and report on security initiatives on: (1) RIS on how physical protection will be handled within ROP construct; (2) status on development and evaluation of physical protection SDP; (3) status on development of physical protection alternative PIs (which will need to be piloted and evaluated prior to implementation). **Closed**

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| 04-24 | <p><u>MSPI – Examples of Problems with Applying 15-minute Exemption on Unavailability</u>
 <u>Task:</u> NRC agreed to identify problems with the 15 minute exemption
 <u>Status:</u> NRC acknowledged there were no other problems other than at one plant where the problem has been corrected. Changes were made to the MSPI guidance. Change needs to be incorporated in NUMARC 93-01 MR guidance.</p> | Closed |
| 04-25 | <p><u>SSU – Examples of Problems with Applying No mode</u>
 <u>Task:</u> Need final position on No Mode

 <u>Status:</u> FAQ approved to resolve issue.</p> | Closed |
| 04-26 | <p><u>SECURITY OF MSPI BASIS DOCUMENTS</u>
 <u>Task:</u> NRC and NEI to check on the classification of MSPI Basis Documents and whether they can be “passed out” at workshops
 <u>Status:</u> There is no guidance requiring special handling of this material</p> | Closed |