Attachment 11

Screening Process For Cross-cutting Aspects

A Possible Method

Background Discussion

- History
  - ROP assumed that cross-cutting issues would be directly associated with findings related to the seven cornerstones
  - Inspection process did not consistently capture or link findings to cross-cutting areas.
  - Recent emphasis on inspector identification
  - NRC implemented improved guidance relative to substantive cross-cutting issues

Background Discussion

- Presently
  - NRC regions and the program office striving for consistency in implementation—getting better
  - Many in the industry and NRC still have questions regarding how/when to identify and characterize cross-cutting aspects
  - NRC Program Office working to improve guidance to inspectors
  - RUG IV asked to put together a recommended screening tool for presentation at September 2005 Industry/NRC ROP Task Force Meeting

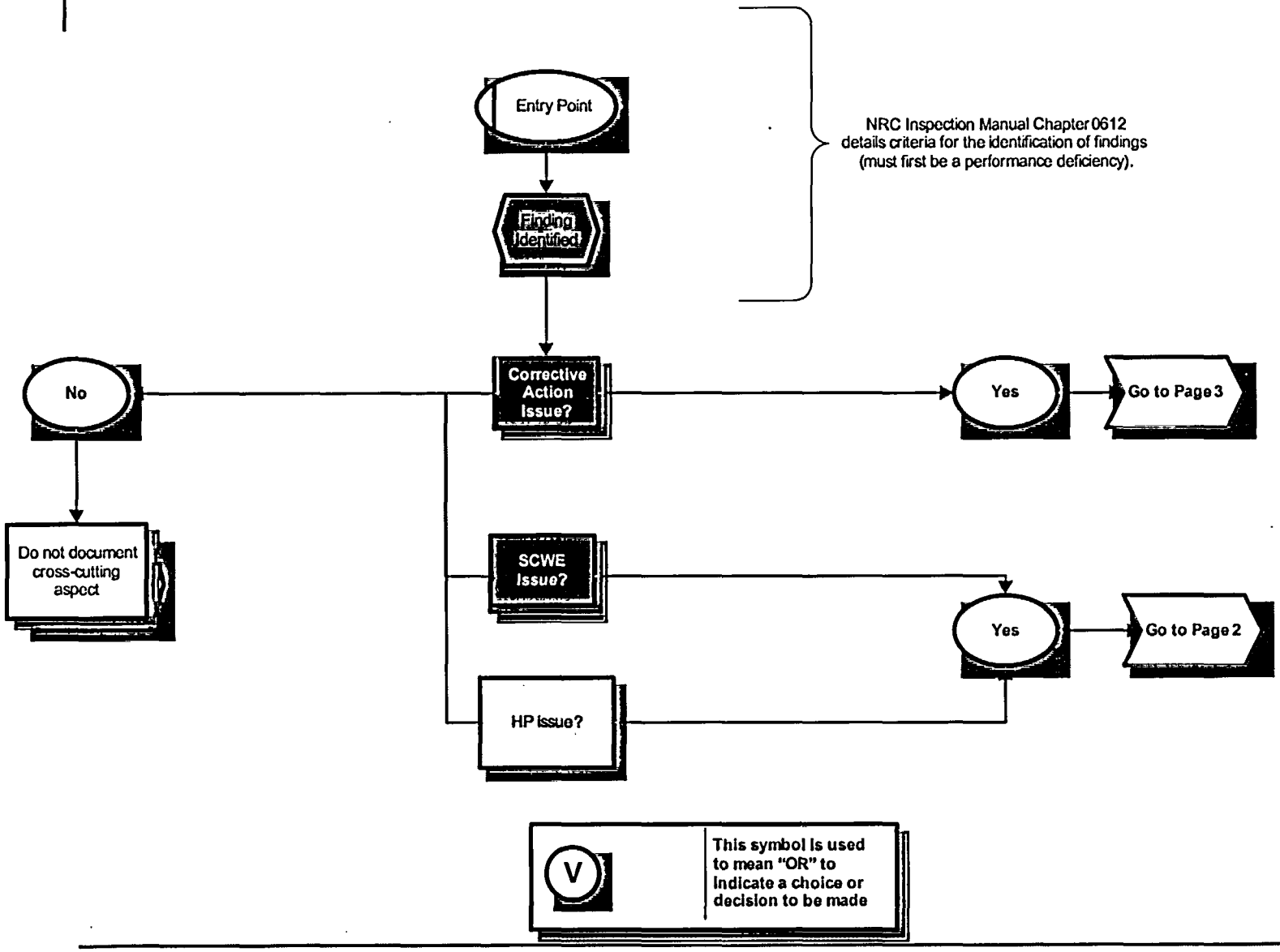
Why a Screening Process?

- Essentially all findings have some actual or potential cross-cutting aspect to them
- Cross-cutting aspects are not created equal—all are not of the same significance
- Would focus attention on findings with more regulatory significance making the mid-cycle and end-of-cycle reviews more meaningful

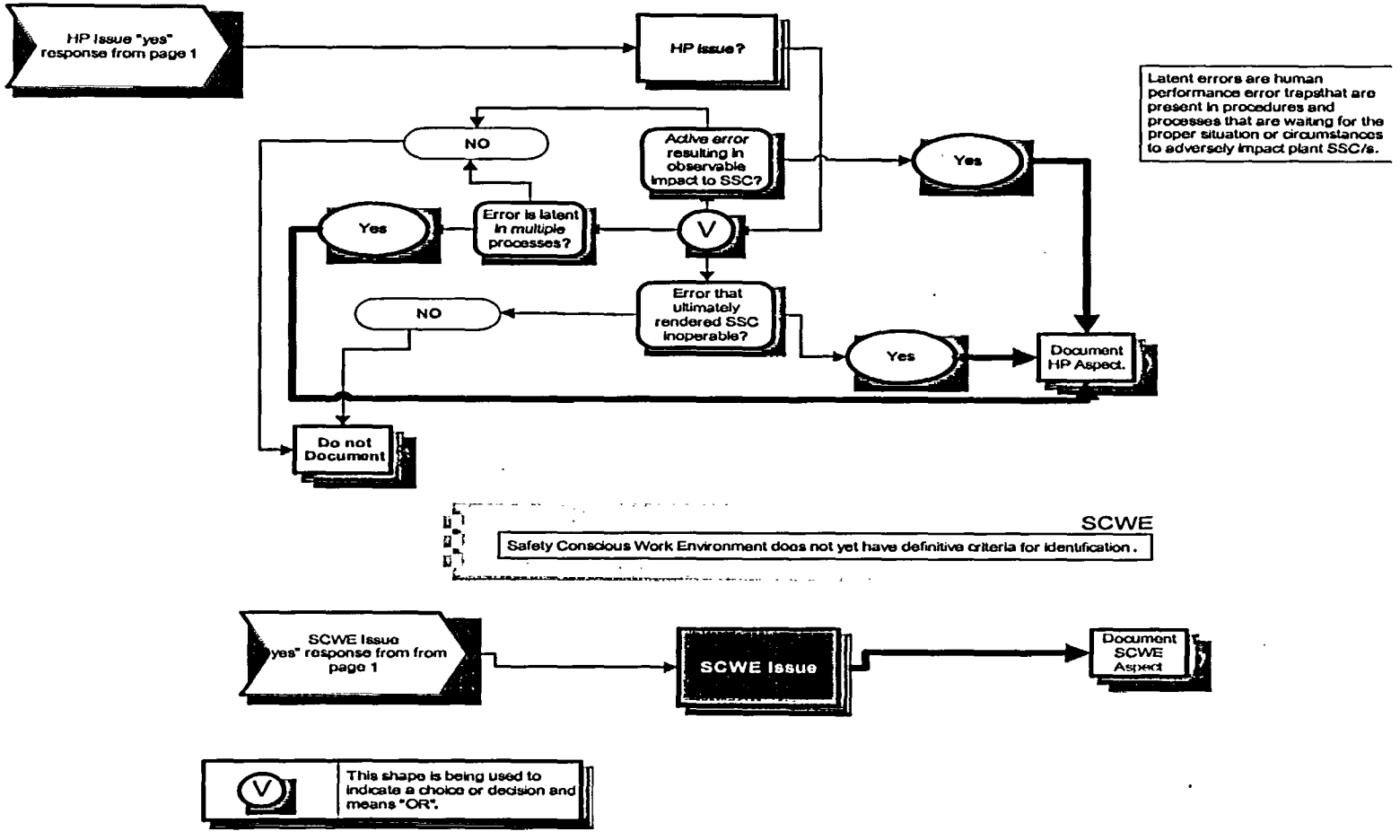
Considerations

- The recommended screening method will help further eliminate issues related to the cross-cutting areas that in some instances should have screened as minor.
- Typically Licensees have a CAP based upon 10CFR50 Appendix 'B' with an appropriate significance determination process.
- PI&R inspections and other team inspections document more observation/findings

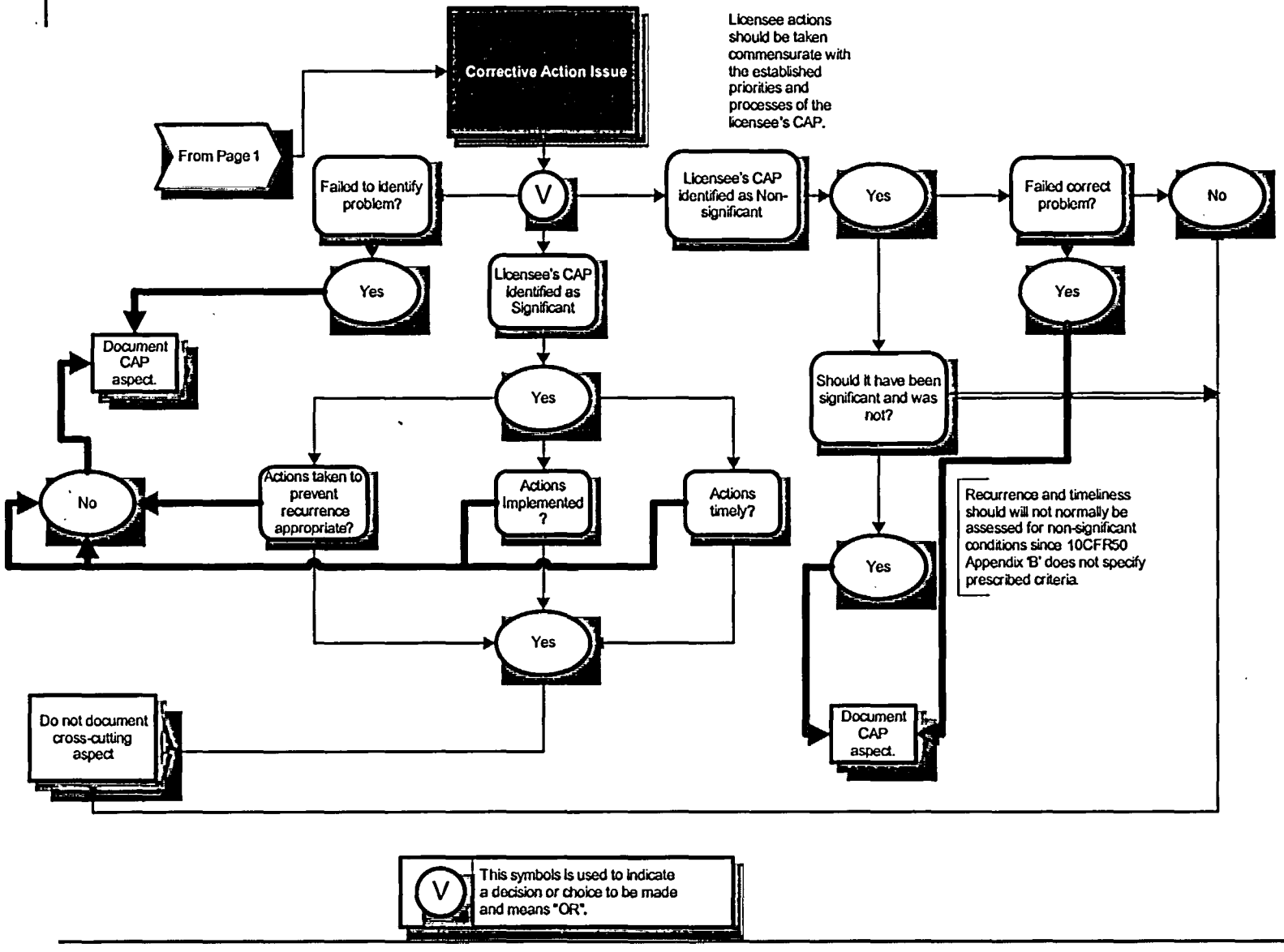
Inspection Finding Screening Method – Page 1



Inspection Finding Screening Method – Page 2



Inspection Finding Screening Method – Page 3



Example 1 – Design Error (HP)

- A temporary work platform was erected near safety related equipment without an engineering evaluation to address potential seismic impact. Multiple examples were noted during the inspection. Following evaluation, no impact to safety related equipment would have occurred.
  - Human performance error attributed to failure to follow process controls
  - Not identified as having "cross-cutting aspect"
  - **Would have cross-cutting aspect IF evaluation determined equipment impact would occur.**

Example 2 – Corrective Action Issue

- A circulating water cooling tower fan motor exhibited excessive vibration requiring bearing replacement. Over the past 2 years this motor has required bearing replacement on 2 different occasions. All instances were documented in the CAP appropriately as "non-significant" conditions.
  - Not cross-cutting aspect because actions to prevent recurrence are not required for this condition and no significant adverse impact to the station was experienced
  - **Would have cross-cutting aspects IF station would have characterized this issue as significant and action to prevent recurrence was not taken or was ineffective.**

Example 3 – Corrective Action Issue

- A component within the scope of the maintenance rule has recurring failures and does not have any specified periodic maintenance requirements.
  - No cross-cutting aspects associated with this issue IF the component is a "run to failure" component and has not impacted system performance criteria.
  - **Would have cross-cutting aspects IF the failures impacted system performance criteria and were not being appropriately addressed within the maintenance rule program.**

Example 4 – Human Performance Issue

- During 2 operations of a turbine driven feedwater pump (<1 year), operators have allowed the turbine to over speed upon startup. The procedures are being followed.
  - **This condition has cross-cutting aspects because it has resulted in an observable impact to SSC.**

Example 5 – Human Performance Issue

- During the performance of a routine surveillance test, an I&C technician installed test leads on the wrong component for monitoring.
  - Does not have cross-cutting aspect IF no impact to plant SSC and is not related to incorrect procedural step.
  - **Would have cross-cutting aspects IF SSC impacted or if procedure had latent error and if performed again would result in a similar impact to SSC.**