From:OPA1To:NRCREP@nrc.govDate:Wed, Oct 26, 2005 9:39 AMSubject:Fwd: General Comments on ROP

This was received via the OPA mailbox on the web site. I'm just assuring it arrived at the proper destination. If this is a duplicate, please disregard.

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E-RIDS=ADH-D3 Och - S. Sanders (5X55)

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Mail Envelope Properties (435F86F9.5E5 : 15 : 26537)

Subject:Fwd: General Comments on ROPCreation Date:Wed, Oct 26, 2005 9:39 AMFrom:OPA1

Created By: <u>OPA1@nrc.gov</u>

Recipients nrc.gov twf2\_po.TWFN\_DO NRCREP (<u>NRCREP@nrc.gov</u>)

Post Office twf2\_po.TWFN\_DO

Security:

Route nrc.gov

Files MESSAGE Mail	<b>Size</b> 498	Date & Time Wednesday, October 26, 2005	9:39 AM
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Options			. •
Expiration Date:	None		
Priority:	Standard		· <b>:</b> ·
<b>Reply Requested:</b>	No		
<b>Return Notification:</b>	None		÷
Concealed Subject:	No		

Standard

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From:	"Tom Gurdziel" <tgurdziel@twcny.rr.com></tgurdziel@twcny.rr.com>
То:	<opa@nrc.gov></opa@nrc.gov>
Date:	Wed, Oct 26, 2005 8:33 AM
Subject:	General Comments on ROP

# Good morning,

You may note that the action party for my comments about acceptable pressure vessel leakage for question 4 is not a plant operating organization but actually the NRC.

Thank you,

Tom Gurdziel

CC: "David Lochbaum" <dlochbaum@ucsusa.org>, <opa1@nrc.gov>, <opa3@nrc.gov>, "James M. Trapp" <jmt1@nrc.gov>

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Page 1

**Mail Envelope Properties** (435F7787.89A : 14 : 26778)

Subject:General Comments on ROPCreation Date:Wed, Oct 26, 2005 8:32 AMFrom:"Tom Gurdziel" <tgurdziel@twcny.rr.com>

**Created By:** 

tgurdziel@twcny.rr.com

Recipients nrc.gov kp1\_po.KP\_DO JMT1 CC (James Trapp) OPA1 CC

nrc.gov ch\_po.CH\_DO OPA3 CC (OPA3 OPA - Region III)

nrc.gov owf1\_po.OWFN\_DO OPA ()

ucsusa.org dlochbaum CC (David Lochbaum)

# **Post Office**

kp1\_po.KP\_DO ch\_po.CH\_DO owf1\_po.OWFN\_DO

Files	Size	Date & Time	
MESSAGE	233	Wednesday, October 26, 2005	8:32 AM
rop2005survey.doc	72192		
Mime.822	100814		
Options			
Expiration Date:	None		
Priority:	Standard		
<b>Reply Requested:</b>	No		
<b>Return Notification:</b>	None		
Concealed Subject:	No		
Security:	Standard		

Route

nrc.gov

nrc.gov

nrc.gov ucsusa.org

# Participant Name: Thomas Gurdziel

Company:

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Address: 9 Twin Orchard Drive, Oswego, NY 13126

E-mail Address: tgurdziel@twcny.rr.com

Phone Number:

# FRN Subject: <u>Solicitation of Public Comments on The 2005 Implementation of the</u> <u>Reactor Oversight Process</u>

# QUESTIONS

In responding to these questions, please consider your experiences using the NRC oversight process. Shade in the circle that most applies to your experiences as follows:

1) very much 2) somewhat 3) neutral 4) somewhat less then needed 5) far less then needed

If there are experiences that are rated as unsatisfactory, or if you have specific thoughts or concerns, please elaborate in the "Comments" section that follows the question and offer your opinion for possible improvements. If there are experiences or opinions that you would like to express that cannot be directly captured by the questions, document that in question number 19.

**FOR FURTHER INFORMATION CONTACT:** Ms. Serita Sanders, Office of Nuclear Reactor Regulation (Mail Stop: OWFN 7A15), U.S. Nuclear Regulatory Commission, Washington DC 20555-0001. Ms. Sanders can also be reached by telephone at 301-415-2956 or by e-mail at SXS5@nrc.gov.

Please send us your response by December 1, 2005, either by postal mail or e-mail:

U.S. Postal System:	Michael T. Lesar
	Chief, Rules and Directives Branch
	Office of Administration (Mail Stop: T6-D59)
	Nuclear Regulatory Commission
	Washington, DC 20555-0001
	•

Electronically: NRCREP@nrc.gov

Note: Those who wish to complete this survey anonymously will not receive a direct response from NRC.

# Questions related to specific Reactor Oversight Process (ROP) program areas

(As appropriate, please provide specific examples and suggestions for improvement.)

(1) Does the Performance Indicator Program provide useful insights to help ensure plant safety?

1	2	3	· 4	5	
C					

# Comments:

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(2) Does appropriate overlap exist between the Performance Indicator Program and the Inspection Program?

1	2	3	4	5

Comments:

(3) Does NEI 99-02, "Regulatory Assessment Performance Indicator Guideline" provide clear guidance regarding Performance Indicators?

1	2	3	4	5

Comments:

(4) Does the Inspection Program adequately cover areas important to safety and is it effective in identifying and ensuring the prompt correction of performance deficiencies?



Comments: For example, at Davis-Besse, nobody noticed the buildup of boric acid residue on the ventilation plenum or, if they did, nobody considered it an important sign of (unidentified) reactor coolant leakage, even though it took 15 - 5 gallon containers to eventually remove it. (The actual hole through the plenum metal apparently wasn't a sign, either.) After the 0350 committee got this place straightened out, a Lessons Learned item remained: it was that the

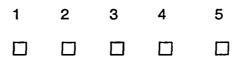
ASME requirements for accepable pressure vessel leakage was too lenient. Today, to the best of my knowledge, this item still remains completely unaddressed.

(5) Is the information contained in inspection reports relevant, useful, and written in plain English?

1	2	3	4	5
$\boxtimes$				

Comments: I don't like having information on a single problem spread out over 2 or 3 sections in the report, though. Also, it is impossible to determine what section you are reading from.

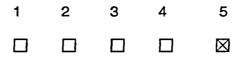
(6) Does the Significance Determination Process yield an appropriate and consistent regulatory response across all ROP cornerstones?



Comments:

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(7) Does the NRC take appropriate actions to address performance issues for those plants outside of the Licensee Response Column of the Action Matrix?



Comments: Example: the use of OI and DOJ at Davis-Besse to prosecute criminal charges has been a multi-year exercise in futility. At Perry, a mainly unsuccessful plant performance improvement initiative simply results in the promise of improvement under "Phase 2", all the while running the plant at full power. Same thing at Hope Creek: why shut down for 6 weeks to replace a generally acknowledged cracked reactor recirculation pump shaft when you have already been allowed to run it 50,000 hours BEYOND the recommended inspection time (of 80,000 hours)?

(8) Is the information contained in assessment reports relevant, useful, and written in plain English?



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Comments:

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**Questions related to the efficacy of the overall ROP.** (As appropriate, please provide specific examples and suggestions for improvement.)

(9) Are the ROP oversight activities predictable (i.e., controlled by the process) and reasonably objective (i.e., based on supported facts, rather than relying on subjective judgment)?

1	2	3	4	5

Comments:

(10) Is the ROP risk-informed, in that the NRC's actions and outcomes are appropriately graduated on the basis of increased significance?

1	2	3	4	5

Comments:

(11) Is the ROP understandable and are the processes, procedures and products clear and written in plain English?

1	2	3	4	5

#### Comments:

Page 4 of 6

(12) Does the ROP provide adequate regulatory assurance when combined with other NRC regulatory processes that plants are being operated and maintained safely?

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		1	2	3	4	5		
Comr	nents:							
(13)	Is the ROP effective	e, efficie	ent, real	istic, an	d timely	?		
		1	2	.3	4	5		
Comn	nents:							
(14)	Does the ROP ensu	ure ope	nness ir	n the reg	gulatory	process?		
		1	2	3	4	5		
Comn	nents:							
(15)	Has the public beer provide inputs and	n afforde comme	ed adeq nts?	luate op	portunit	y to partici	pate in the F	OP and to
		1	2	3	4	5		
Comn	nents:							
(16)	Has the NRC been	respon	sive to p	oublic in	puts and	d commen	ts on the RC	)P?
•		1	2	3	4	5		
				Page 5	of 6			

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Comments:

(17)	Has the NRC implemented the ROP as defined by program documents?					
		1	2	.3	4	5
Comments:						
(18)	Does the ROP result in unintended consequences?					
		1	2	3	4	5
Comments:						

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(19) Please provide any additional information or comments related to the Reactor Oversight Process.

Dated at Rockville, Maryland, this 14th day of October 2005.

For the U.S. Nuclear Regulatory Commission

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Stuart A. Richards Office of Nuclear Reactor Regulation Division of Inspection Program Management Inspection Program Branch

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