

September 22, 2006

MEMORANDUM TO: Luis A. Reyes
Executive Director for Operations

FROM: James T. Wiggins, Chairman */RA/*
Lessons-Learned Oversight Board

SUBJECT: LESSONS-LEARNED OVERSIGHT BOARD: SUMMARY OF THE
MEETING HELD ON SEPTEMBER 12, 2006

The Lessons-Learned Oversight Board (LLOB) Meeting was held on September 12, 2006, at 10:00 A.M., with the following attendees: James Wiggins (RES), Michael Weber (NRR), William Dean (NSIR), Joseph Holonich (NMSS), Loren Plisco (Regional Representative) via teleconference, and John G. Lamb (OEDO). The purpose of the meeting was to review the recommendations from the Liquid Radioactive Release Task Force Final Report, dated September 1, 2006 (ML062440141). The LLOB is responsible for ensuring that the criteria for the lessons-learned threshold are appropriately applied to all potential lessons-learned items in accordance with Management Directive 6.8, "Lessons-Learned Program."

The LLOB reviewed the 30 recommendations in the Liquid Radioactive Release Task Force Final Report to determine if any of the recommendations met the lessons-learned threshold for additional oversight in the Lessons-Learned Program (LLP). A potential lessons-learned item must meet all of the following criteria to be designated a lessons-learned item:

1. The item has significant organizational, safety, security, emergency preparedness, or generic implications;
2. A need to institutionalize corrective action for this item because the failure to do so would reasonably be expected to challenge the ability of the agency to meet any of the strategic outcomes designated in the Strategic Plan, or the corrective action would substantially improve the safety or security of NRC employees;
3. A root cause exists - or can be identified; and
4. The apparent resolution is actionable.

The enclosed table provides all of the recommendations from the Liquid Radioactive Release Task Force Final Report and indication for each recommendation whether each of the four criteria above meets its threshold.

The LLOB determined that the Liquid Radioactive Release Task Force recommendations can be addressed adequately by the appropriate program offices and as indicated in the enclosed table, none of the recommendations met the threshold requirements for all four criteria to qualify for additional oversight by the LLOB. Therefore, the Liquid Radioactive Release Task Force recommendations will not be entered into the LLP.

Enclosure: As stated

cc: Those on the Attached List

September 22, 2006

MEMORANDUM TO: Luis A. Reyes
Executive Director for Operations

FROM: James T. Wiggins, Chairman */RA/*
Lessons-Learned Oversight Board

SUBJECT: LESSONS-LEARNED OVERSIGHT BOARD: SUMMARY OF THE
MEETING HELD ON SEPTEMBER 12, 2006

The Lessons-Learned Oversight Board (LLOB) Meeting was held on September 12, 2006, at 10:00 A.M., with the following attendees: James Wiggins (RES), Michael Weber (NRR), William Dean (NSIR), Joseph Holonich (NMSS), Loren Plisco (Regional Representative) via teleconference, and John G. Lamb (OEDO). The purpose of the meeting was to review the recommendations from the Liquid Radioactive Release Task Force Final Report, dated September 1, 2006 (ML062440141). The LLOB is responsible for ensuring that the criteria for the lessons-learned threshold are appropriately applied to all potential lessons-learned items in accordance with Management Directive 6.8, "Lessons-Learned Program."

The LLOB reviewed the 30 recommendations in the Liquid Radioactive Release Task Force Final Report to determine if any of the recommendations met the lessons-learned threshold for additional oversight in the Lessons-Learned Program (LLP). A potential lessons-learned item must meet all of the following criteria to be designated a lessons-learned item:

1. The item has significant organizational, safety, security, emergency preparedness, or generic implications;
2. A need to institutionalize corrective action for this item because the failure to do so would reasonably be expected to challenge the ability of the agency to meet any of the strategic outcomes designated in the Strategic Plan, or the corrective action would substantially improve the safety or security of NRC employees;
3. A root cause exists - or can be identified; and
4. The apparent resolution is actionable.

The enclosed table provides all of the recommendations from the Liquid Radioactive Release Task Force Final Report and indication for each recommendation whether each of the four criteria above meets its threshold.

The LLOB determined that the Liquid Radioactive Release Task Force recommendations can be addressed adequately by the appropriate program offices and as indicated in the enclosed table, none of the recommendations met the threshold requirements for all four criteria to qualify for additional oversight by the LLOB. Therefore, the Liquid Radioactive Release Task Force recommendations will not be entered into the LLP.

Enclosure: As stated

cc: Those on the Attached List

ADAMS ACCESSION NO: ML062570300

* See previous concurrence

OFFICE	OEDO	OEDO	AO	RES
NAME	J. Lamb/jll*	B. Wetzel*	M. Johnson*	J. Wiggins
DATE	09/15/06	09/15/06	09/18/06	09/22/06

OFFICIAL RECORD COPY

MEMORANDUM TO THOSE ON THE ATTACHED LIST DATED: 09/22/06

SUBJECT: LESSONS-LEARNED OVERSIGHT BOARD: SUMMARY OF THE
MEETING HELD ON SEPTEMBER 12, 2006

	<u>E-Mail Mail Stops</u>
William F. Kane, Deputy Executive Director for Reactor and Preparedness Programs, OEDO	RidsEdoMailCenter
Martin J. Virgilio, Deputy Executive Director for Materials, Research, State and Compliance Programs, OEDO	RidsEdoMailCenter
Jacqueline E. Silber, Deputy Executive Director for Information Services and Administration, and Chief Information Officer, OEDO	RidsEdoMailCenter
Michael R. Johnson, Assistant for Operations, OEDO	RidsEdoMailCenter
Timothy F. Hagan, Director, Office of Administration	RidsAdmMailCenter
Cynthia A. Carpenter, Director, Office of Enforcement	RidsOeMailCenter
Guy P. Caputo, Director, Office of Investigations	RidsOiMailCenter
Edward T. Baker, Director, Office of Information Services	RidsOis
James F. McDermott, Director, Office of Human Resources	RidsHrMailCenter
Jack R. Strosnider, Director, Office of Nuclear Material Safety and Safeguards	RidsNmssOd
James E. Dyer, Director, Office of Nuclear Reactor Regulation	RidsNrrOd
Brian W. Sheron, Director, Office of Nuclear Regulatory Research	RidsResOd
Corenthis B. Kelley, Director, Office of Small Business and Civil Rights	RidsSbcrMailCenter
Janet R. Schlueter, Director, Office of State and Tribal Programs	RidsStpMailCenter
Roy P. Zimmerman, Director, Office of Nuclear Security and Incident Response	RidsNsirOd
Samuel J. Collins, Regional Administrator, Region I	RidsRgn1MailCenter
William D. Travers, Regional Administrator, Region II	RidsRgn2MailCenter
James L. Caldwell, Regional Administrator, Region III	RidsRgn3MailCenter
Bruce S. Mallett, Regional Administrator, Region IV	RidsRgn4MailCenter

Liquid Release Task Force Recommendations

The table below provides the 30 recommendations from the Liquid Radioactive Release Task Force Final Report and for each recommendation indication of whether threshold for each of the four criteria is met. The threshold for all four criteria have to be met to qualify a recommendation as a lessons learned item. In this case, none of the recommendations qualified as a lessons learned.

Recommendations Considered for Potential Lessons Learned Item	Criteria for Lessons Learned Item ("X" indicates meeting threshold. Need to meet threshold for all 4 criteria to qualify as Lessons Learned Item)			
	Significant implications	Challenge strategic outcomes	Root cause exists or can be identified	Resolution is actionable
2.3 (1) Develop position on using lake water that contains licensed radioactive material			X	X
3.1.4(1) Develop guidance for detecting, evaluating, and monitoring releases via unmonitored pathways	X		X	X
3.2.1.4(1) Revise the REMP requirements and guidance to be consistent with current standards and technology			X	X
3.2.1.4(2) Revise REMP guidance to limit flexibility and expand guidance on when the program should be expanded			X	X
3.2.1.4(3) Develop guidance on spills and leaks that need to be documented			X	X
3.2.1.4(4) Provide guidance on expanding the use of historical information under 50.75(g)			X	X
3.2.1.4(5) Evaluate the need for regulations or guidance on remediation			X	X
3.2.1.4(6) Require adequate assurance that leaks and spills will be detected before radionuclides migrate offsite	X		X	X
3.2.1.4(7) Develop regulatory guidance on acceptable methods to survey and monitor on-site groundwater and sub-surface soil			X	X

Recommendations Considered for Potential Lessons Learned Item	Criteria for Lessons Learned Item ("X" indicates meeting threshold. Need to meet threshold for all 4 criteria to qualify as Lessons Learned Item)			
	Significant implications	Challenge strategic outcomes	Root cause exists or can be identified	Resolution is actionable
3.2.2.4(1) Require adequate assurance that leaks and spills will be detected before radionuclides migrate offsite via unmonitored pathway	X		X	X
3.2.2.4(2) Determine need for improved design, materials, or QA requirements for SSCs for new reactors	X		X	X
3.2.2.4(3) Consider whether further action is warranted to enhance performance of SFP telltale drains			X	X
3.2.2.4(4) Verify that the effects of long-term boric acid leakage from Spent Fuel Pools on SSCs have been considered	X		X	X
3.2.2.4(5) Assess whether the maintenance rule adequately covers SSCs that contain radioactive liquids	X		X	X
3.2.2.4(6) Verify that the license renewal reviews degradation of systems containing radioactive materials	X		X	X
3.2.3.4(1) Communicate with States on NPDES application to radioactive discharges to promote common understanding	X		X	X
3.3.4(1) Develop inspection guidance to review onsite contamination events			X	X
3.3.4(2) Revise inspection program to evaluate effluent pathways to ensure that new pathways are identified and placed in ODCM			X	X
3.3.4(3) Allow limited, defined radioactive releases to the environment where such events would not be documented under present guidance	X		X	X

Recommendations Considered for Potential Lessons Learned Item	Criteria for Lessons Learned Item ("X" indicates meeting threshold. Need to meet threshold for all 4 criteria to qualify as Lessons Learned Item)			
	Significant implications	Challenge strategic outcomes	Root cause exists or can be identified	Resolution is actionable
3. 3.4(4) Revise the Public Radiation SDP to address the range of events that can occur, including unplanned, unmonitored releases	X		X	X
3.4.4(1) Require adequate assurance that leaks and spills will be detected before migration offsite	X		X	X
3.4.4(2) Develop guidance for evaluating and monitoring releases via unmonitored pathways	X		X	X
3.4.4(3) Define the magnitude of spills and leaks that need to be documented under 50.75(g)	X		X	X
3.4.4(4) Develop regulatory guidance to describe acceptable options for minimizing contamination in accordance with 20.1406	X		X	X
3.4.4(5) Evaluate whether present decommissioning funding requirements adequately address the need to remediate soils and groundwater	X		X	X
3.5.4(1) Consider the development of guidance on evaluation of radionuclide transport in groundwater	X		X	X
3.5.4(2) Develop regulatory guidance to describe acceptable alternatives to minimizing contamination	X		X	X
3.6.4(1) Consider whether to notify the public of radioactive releases to the environment at a lower threshold	X		X	X
3.6.4(2) Ensure event description risks are described with the proper context			X	X

Recommendations Considered for Potential Lessons Learned Item	Criteria for Lessons Learned Item ("X" indicates meeting threshold. Need to meet threshold for all 4 criteria to qualify as Lessons Learned Item)			
	Significant implications	Challenge strategic outcomes	Root cause exists or can be identified	Resolution is actionable
3.6.4(3) Licensees should consider entering into agreements with local and state agencies to report liquid releases at a lower threshold			X	X

Strategic Outcomes

- 1.1 No nuclear reactor accidents.
- 1.2 No inadvertent criticality events.
- 1.3 No acute radiation exposures resulting in fatalities.
- 1.4 No releases of radioactive materials that result in significant radiation exposures.
Number of events with radiation exposures to the public and occupational workers that exceed Abnormal Occurrence Criterion I.A.
- 1.5 No releases of radioactive materials that cause significant adverse environmental impacts. Number of radiological releases to the environment that exceed applicable regulatory limits. (Releases for which a 30-day report requirement under 10 CFR 20.2203(a)(3) is required; > license limits or > 10x applicable limits for unrestricted areas)
- 2.1 No instances where licensed radioactive materials are used domestically in a manner hostile to the security of the United States.
- 3.1 Stakeholders are informed and involved in NRC processes as appropriate.
- 4.1 No significant licensing or regulatory impediments to the safe and beneficial uses of radioactive materials.
- 5.1 Continuous improvement in NRC's leadership and management effectiveness in delivering the mission.
- 5.2 A diverse, skilled workforce and an infrastructure that fully support the agency's mission and goals.