



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

February 5, 2007

MEMORANDUM TO: Stuart A. Richards, Deputy Director
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Dwight Chamberlain, Director
Division of Reactor Safety

SUBJECT: COMMENTS ON PROPOSED CHANGES TO IMC 0609, APPENDIX A,
"DETERMINING THE SIGNIFICANCE OF REACTOR INSPECTION
FINDINGS FOR AT-POWER SITUATIONS"

Thank you for the opportunity to provide our comments on the subject inspection manual revision.

The changes are substantial and include new SDP tools for inspector and SRA use. These new tools include the Site Specific "Pre-Solved" Tables and new External Events screening tools. Serious consideration should be given for requesting professional training staff support for developing a new lesson plan and training module on these SDP changes.

We appreciate the progress that has been made to improve the SDP. Our comments are included in the Enclosure.

If you have any questions concerning our comments, please contact Russ Bywater (817 860-8182), David Loveless (817 860-8161), or Mike Runyan (817 860-8142).

Enclosure: Comments

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General Comments:

1. Changes in the IMC revision are substantial. They include use of the new Site Specific "Pre-Solved" Tables and use of a new screening process for determining risk contribution from external initiators. Region IV recommends that a detailed lesson plan and training module be developed by Technical Training Center staff. A training session of sufficient duration should be incorporated in an inspector counterpart meeting. However, this may not be timely because the next Region IV inspector counterpart meetings are not until Fall 2007. Consideration should be given to having a training session before then. A web-based training module should also be considered.
2. Treatment of "uncertainty" is regularly an important consideration when the SDP result is on the "Green-White threshold." The Phase 3 SDP instructions in the IMC should provide explicit guidance on the staff's expectations for SDP analysis in this area.
3. Links should be added on the "ROP Digital City" website to the RASP Handbooks for Internal and External Events Assessment.

Specific Comments:

1. Appendix A, Attachment 1, Phase 1, Step 1.1: Guidance needs to be added to define what is meant by "loss of system safety function" and "loss of safety function of a single train," as used in the Phase 1 Worksheet.
2. Appendix A, Attachment 1, Phase 2.1: Guidance needs to be provided on how to address findings affecting Initiating Event Frequency using the Pre-Solved Tables.
3. Appendix A, Attachment 1, Phase 2.1: Guidance needs to be provided on how to address Operator Recovery Credit using the Pre-Solved Tables.
4. Appendix A, Attachment 1, Phase 2.1, Step 2.1.5: Paragraph (2)(b) appears to be out of sequence and should be replaced as Paragraph (1)(b).

Enclosure

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