

8/8/07  
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**From:** A. Warren Lippitt <lippitaw@songs.sce.com>  
**To:** <nrcprep@nrc.gov>  
**Date:** Thu, Aug 9, 2007 12:46 PM  
**Subject:** Response from "Comment on NRC Documents"

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A. Warren Lippitt (lippitaw@songs.sce.com) on Thursday, August 09, 2007 at 12:46:17

Document\_Title: FY 2007-2012 Strategic Plan (NUREG-1614, Vol. 4) Draft for Comment

Comments: NRC states that in the interest of Human Capital, it will "ensure that each office has a knowledge management philosophy to retain knowledge that may otherwise been lost through attrition."

This is an important goal, particularly for the next generation of regulating personnel and new nuclear plants. Unfortunately after 27 years of aggressive collection of operating experience from nuclear plants and other nuclear facilities, it is becoming more and more difficult to retrieve the detailed technical insights from the vast, low value ore of the operating experience reports. INPO made some effort to condense operating experience into a structured summary for troubleshooting support, but that effort was stopped in 1993. INPO has issued information on operating experience by area, but these are mostly long reading lists rather than useful summaries and tend to be from the "20,000 foot management level. EPRI has included troubleshooting guidance in its Maintenance Application Guides, and this is very useful (though not always available to NRC personnel). However, there are many lessons that still need to be summarized to support technical needs. Collecting and !

consolidating the detailed lessons and insights, especially of the potential failure modes, is not particularly difficult but requires a certain mental bent. After all, it was possible for myself to do this at INPO, and I was considered to be a below average employee.

I encourage you to encourage the industry to do a better job of developing consolidated summaries of operating experience insights and lessons. Both NRC and the nuclear industry in general needs the capability of getting to the insights of operaing experience in a rapid manner. Being able to get at the potential failure modes would give a tremendous advantage for properly resolving problems.

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**Creation Date** Thu, Aug 9, 2007 12:46 PM  
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