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**From:** Barry Norris  
**To:** Raymond Powell  
**Date:** 08/27/2007 5:21:50 PM  
**Subject:** draft talking points

I also gave a copy to Glenn for his review

**CC:** Glenn Dentel

B-48

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**Subject:** draft talking points  
**Creation Date** 08/27/2007 5:21:50 PM  
**From:** Barry Norris

**Created By:** BSN@nrc.gov

**Recipients**

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kp1\_po.KP\_DO  
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RJP (Raymond Powell)

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kp1\_po.KP\_DO

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MESSAGE	358	08/27/2007 5:21:50 PM	
TEXT.htm	257		
Talking points for VY newspaper article.wpd		20940	08/27/2007 5:18:15
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## **Vermont Yankee - Newspaper Article & 2.206 Petition:**

### **Reactor Oversight Process**

- The Reactor Oversight Process (ROP) is designed to be objective and predictable so that given the same performance, different licensees across the country will receive the same level of regulatory oversight. Under the ROP, plants that show symptoms of declining performance receive increased levels of inspection.
- The ROP is a continuous process that has two main components: a suite of performance indicators that provide objective measures of performance in key parameters, and an inspection program that evaluates performance in all areas affecting plant safety. Performance indicator results and inspection findings are integrated to arrive at objective conclusions about safety performance.
- Under the ROP, licensees manage their own problems absent risk-significant issues. If risk significant issues are identified, they will result in increased oversight and inspections. Continued decline in performance can result in a plant being shutdown.
- The ROP is designed to be objective. If a plant's performance declines sufficiently, the ROP provides for the NRC to exercise additional oversight.
- The ROP provides continual oversight versus a one-time evaluation that would be obtained from an Independent Safety Assessment (ISA) or a Diagnostic Evaluation Team (DET).

### **Is Vermont Yankee Safe to Operate?** (considering the cooling tower collapse and the strike)

- There are NRC Resident Inspectors assigned to Vermont Yankee who go to the site everyday. In addition, region based personnel perform specialized inspections throughout the year.
- A comprehensive inspection of the implementation of Entergy's corrective action program at Vermont Yankee is conducted biennially.
- The ROP provides confidence that Vermont Yankee is being operated safely. The ROP is a continuous process that integrates inspection findings and performance indicator results to arrive at objective conclusions about safety performance.
- Vermont Yankee is in the Licensee Response column of the ROP Action Matrix based on all inspection findings being classified as having very low safety significance and all performance indicators indicating performance at a level requiring no additional oversight.
- Consideration of the safety of any reactor must take into account all safety measures. The concept of "Defense in depth" provides multiple barriers between the radioactive material and public safety. Aspects such as emergency planning, quality assurance, operator training, and detailed procedures contribute to plant safety. When viewed against all the safety measures at Vermont Yankee, the problems listed are not

considered highly risk significant.

### **Safety Conscious Work Environment**

- As part of biennial corrective action program inspection, the NRC inspectors assess whether an atmosphere that is free from intimidation, that encourages station personnel to raise safety concerns to station management. Other avenues available include the Employee Concern Program, or coming to the NRC with their concerns.

### **Allegation Process**

- It is the policy of the NRC to encourage workers at regulated nuclear facilities to take technical safety concerns to their own management first. However, workers can bring safety concerns directly to the NRC at any time. All individuals should feel free to communicate to the NRC any safety or wrongdoing concerns. It is the agency's responsibility to respond to those concerns in a timely manner and to protect the identity of the individual to the greatest degree possible.