

October 30, 2007

MEMORANDUM TO: Marc L. Dapas, Deputy Regional Administrator, RI  
Charles A. Casto, Deputy Regional Administrator, RII  
Mark A. Satorius, Deputy Regional Administrator, RIII  
Thomas P. Gwynn, Deputy Regional Administrator, RIV

FROM: Stuart A. Richards, Deputy Director/**RA**/  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: REACTOR OVERSIGHT PROCESS (ROP) INSPECTION PROGRAM  
REALIGNMENT RESULTS - CALENDAR YEAR 2007

As part of its periodic review to ensure most effective overall application of inspection resources, the inspection program branch (IIPB) established a inspection program working group to gauge the effectiveness of each of the inspection procedures and examined the inspection resources used for each procedure to determine whether appropriate inspection resources were being applied in each of the inspectable areas in the ROP. The inspection program working group consisted of staff from IIPB and each of the four regions. The results of the ROP inspection program working group were shared with senior NRR management from Division of Inspection and Regional Support (DIRS), NRR and with regional Division Directors from Division of Reactor Projects and Reactor Safety. Majority position was reached by senior regional managers for those inspection procedures (IPs) which were determined to require a revision.

Because inspection procedure effectiveness was by its nature difficult to establish in an unambiguous way, the ROP realignment working group recognized that using a single metric (e.g., reviewing the number of findings (whether green or greater than green) developed under an individual inspection procedure over a specified period) was not necessarily indicative of the effectiveness and value of the inspection procedure. Consequently, the working group used the following key quantitative and qualitative parameters for their review effort:

- (1) Quantitative data on the number of findings per 1000 inspection hours expended under the subject procedure
- (2) Inspection findings identified during CY 2004 through CY 2006 (01/10/2004 to 12/31/2006) period.
- (3) Inspection program lessons learned and feedback from internal stakeholders.
- (4) Retention of those inspection activities which require significant portion of in-plant presence versus in-office review of documents

CONTACT: James A. Isom, NRR/DIRS  
301-415-1109

Table 1 contains the changes planned for the inspection program portion of the ROP resulting from the 2007 ROP inspection program realignment improvement initiative. These changes will take effect starting in CY 2008. For those inspection procedures which had its periodicity changed from biennial to triennial, the first year of the triennial cycle will start in CY 2008. Additionally, the regions do not have to perform inspection procedure which was deleted but was originally scheduled to be completed during CY 2008 (e.g., the triennial portion of IP 71111.12, "Maintenance Effectiveness").

## Deputy Regional Administrators

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Enclosure: As stated

DISTRIBUTION: See next page.

ADAMS ACCESSION NUMBER: ML073020593

\* see previous concurrence

OFFICE	DIRS/IIPB	DIRS/IIPB:SC	DIRS/DD
NAME	JAlsom	TXReis	SRichards
DATE	10/30/2007	10/30/2007	10/30/2007

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## Deputy Regional Administrators

### Public

#### IIPB/RF

D. Lew, RI

J. Clifford, RI

M. Gamberoni, RI

D. Roberts, RI

C. Casto, RII

C. Christensen, RII

J. Shea, RII

K. Kennedy, RII

C. Pederson, RIII

G. Shear, RIII

S. West, RIII

A. Boland, RIII

A. Howell, RIV

T. Vogel, RIV

D. Chamberlain, RIV

R. Caniano, RIV

RidsRgn1MailCenter

RidsRgn2MailCenter

RidsRgn3MailCenter

RidsRgn4MailCenter

IIPB staff

NSIR/DNS/SOS

NSIR/DPR/EPD

NRR/DIPM/IPSB

Table 1 - Planned Changes to the Reactor Oversight Process for CY 2008

Inspection Procedure (IP):	Planned Changes
IP 71111.01 - Adverse Weather	Add external flooding review currently contained in IP 71111.06, "Flood Protection Measures," to IP 71111.01, "Adverse Weather" and increase inspection resources of IP 71111.01 by 4 hours to account for additional inspection sample (external flooding review).
IP 71111.02 - Evaluation of Changes, Tests, or Experiments	Create a new IP which will combine inspection requirements from IPs 71111.02 and the biennial portion of IP 71111.17 to be performed in the time interval between CDBIs. This new IP will be more robust review of licensee's engineering activities and will require increased inspection resources.
IP 71111.04 - Equipment Alignment	No changes planned
IP 71111.05 - Fire Protection	Reduced sample size and inspection hours for quarterly/annual portion of this inspection procedure. No changes planned for the triennial portion of this inspection activity.
IP 71111.06 - Flood Protection	Moved review of external flooding inspection requirement to IP 71111.01, "Adverse Weather" and reduced inspection resources of IP 71111.06 by 4 hours to account for reduction in inspection sample.
IP 71111.07 - Heat Sink Performance	No changes planned for the annual portion of IP 71111.07. Changed the biennial portion of IP 71111.07 to triennial.
IP 71111.08 (BWR) - ISI Activities	Add section to review augmented or industry initiative examinations
IP 71111.08 (PWR) - ISI Activities	Add section to review augmented or industry initiative examinations
IP 71111.11 - Licensed Operator Requal Program	No changes planned. Will revise inspection procedure based on the results of the licensed operator requalification program working group which is scheduled to complete their review and provide recommendations to improve this inspection procedure during CY 2008.
IP 71111.12 - Maintenance Effectiveness	No change planned for the portion of IP 71111.12 performed quarterly. Delete the triennial portion of IP 71111.12.
IP 71111.13 - Maintenance Risk Assessments and Emergent Work Control	Reduced sample size and inspection resource estimate.

Inspection Procedure (IP):	Planned Changes
IP 71111.15 - Operability Evaluations	Add inspection guidance to review adequacy of licensee's safety evaluation (50.59) if these evaluations were completed to support their operability evaluations.
IP 71111.17 - Permanent Plant Modifications	<p>Combine the Permanent Plant Modification (IP 71111.17A - annual section only) and Temporary Modification (IP 71111.23) inspection procedures. The new inspection procedure will review licensee modifications without differentiating whether the modification is either temporary or permanent.</p> <p>Create a new IP which will combine inspection requirements from IPs 71111.02 and the biennial portion of IP 71111.17 to be performed in the time interval between CDBIs. This new IP will be more robust review of licensee's engineering activities and will require increased inspection resources.</p>
IP 71111.19 - Post-Maintenance Testing	No change
IP 71111.20 - Refueling and Other Outage Activities	Increased inspection resource estimate for the Refueling and Other Outage Activities inspection procedure to reflect the actual hours being used by inspectors.
IP 71111.21 - Safety System Design and Performance Capability	<p>Changed from biennial to triennial based on the NRC staff's review of the inspection results from calendar year 2004 through 2007. The staff determined that the change to the CDBI inspection frequency to triennial frequency could be accomplished and reactor safety in the engineering areas can be verified adequately. This decision was based on the fact that only very low risk significant findings were identified, reduced availability of high risk and low margin component and operator actions for future CDBI inspections, and the new engineering inspection to augment the CDBI inspections.</p> <p>Even with the revision to the CDBI inspection frequency from biennial to triennial, NRC will be expending more man-hours of inspections towards review of licensee's engineering activities than when the ROP was initiated in 2000.</p>
IP 71111.22 - Surveillance Testing	No change

Inspection Procedure (IP):	Planned Changes
IP 71111.23 - Temporary Plant Modifications	Combine the Permanent Plant Modification (IP 71111.17A - annual section only) and Temporary Modification (IP 71111.23) inspection procedures. The new inspection procedure will review licensee modifications without differentiating whether the modification is either temporary or permanent.
IP 71151 - Performance Indicator Verification	No change
IP 71152 - Identification and Resolution of Problems	Wait on recommendations from the PI&R working group.
IMC 2515 Appendix D: Plant Status	No change
IP 71121 - Occupational Radiation Safety	No change
IP 71122 - Public Radiation Safety	No change