

OIG Recommendations 1, 2 and 4 Resolution Training

Division of License Renewal

Staff Meeting

April 24, 2008

Summary

- Introduction
- OIG Recommendations
 - Documentation
 - Process Review
 - Operating Experience
- Conclusion
- Training

Introduction

- Background
 - OIG Audit Report Findings and Recommendations
- Outcome: Program Enhancements
- Implementation
 - Evolutionary not Revolutionary
 - Future improvements from experience and lessons learned
 - Start: Susquehanna

OIG Recommendation 1

- Recommendation: Establish report-writing standards for describing the license renewal review methodology and providing support for conclusions
- New attachments added to the Project Manager Handbook:
 - General Safety Evaluation Report Writing Expectations (Attachment 9, “SER Style Guide,” Section 9)
 - Safety Evaluation Report Writing Guidelines and Samples (Attachment 29)
- These attachments provide the management expectations communicated during these two meetings:
 - February 14, 2008
 - March 25, 2008

General SER Writing Expectations

Project Manager Handbook Attachment 9, Section 9

- Continue to follow SER preparation standards in existing guidance.
- Reference relevant applicant documents such as the LRA and responses to requests for additional information (RAI); briefly summarize or paraphrase information provided in such documents, if necessary, without cutting and pasting.
- Reference relevant NRC documents and correspondence such as the SRP-LR, the GALL Report, or requests for additional information (RAI); briefly summarize or paraphrase information provided in such documents, if necessary, without cutting and pasting.
- Differentiate clearly between applicant-provided information and the staff's independent analysis and conclusions.
- Summarize the staff's review methodology and explain the technical basis for staff findings and conclusions.

SER Writing Guidelines and Samples

Project Manager Handbook Attachment 29

- Shows how to implement the General SER Writing Expectations through
 - Guidance Tables
 - Comparison to the existing SER shell

SER Writing Guidelines and Samples Continued

Project Manager Handbook Attachment 29

- Guidance Tables
 - Function: Highlight the important aspects of each safety evaluation review area and provide corresponding samples which meet the General SER Writing Expectations
 - Illustrate what a technical reviewer should provide to the Project Manager
 - Two Column Design
 - Management Expectation
 - Issue Identification
 - Issue Resolution
 - Findings Supported by Adequate Technical Bases
 - Conclusion
 - Sample Documentation
 - Topic-Specific Example on an Appropriate SER Write-Up
 - Simplified for Clarity
 - Example

SER Writing Guidelines and Samples Continued

Project Manager Handbook Attachment 29

- Comparison to the existing SER shell
 - Efforts to streamline the SER and make it more consistent with Office Instruction LIC-101
 - Section-by-section discussion

OIG Recommendation 2

- Recommendation: Revise the report quality assurance process to include both management controls and implementing procedures which specify additional steps to ensure report quality meets management's expectations
- New directive added to the Project Manager Handbook:
 - Safety Evaluation Report Process Review Procedure (Attachment 30)
 - Purposes
 - Address OIG Recommendation 2
 - Process Enhancement

SER Process Review Procedure

Project Manager Handbook Attachment 30

- Reviewer Qualifications and Responsibilities
 - Assigned by the RPOB Branch Chief
 - Independent, familiar with preparation process
 - Gauges effectiveness of SER preparation by reviewing samples
 - Concurs on the SER

- Primary Review Focus
 - SER summarizes rather than copies relevant licensee and NRC information
 - SER differentiates between applicant information and the staff's independent conclusions
 - SER provides the basis for staff's findings and conclusions

SER Process Review Procedure Continued

Project Manager Handbook Attachment 30

- Review Procedure Highlights
 - Receive SER from the project manager to begin a documentation review, not a technical review
 - May occur in parallel with other concurrence reviews
 - Focus on samples from all the technical areas in the SER, with specific attention on more challenging areas like programs and aging management reviews not consistent with the GALL Report
 - Verify that guidance and expectations have been followed
 - General SER Writing Expectations (Attachment 9, Section 9)
 - SER Writing Guidelines and Samples (Attachment 29)

OIG Recommendation 4

- Recommendation: Establish requirements and management controls to standardize the conduct and depth of license renewal operating experience reviews
- New directive added to the Project Manager Handbook:
 - Operating Experience Review Responsibilities (Attachment 31)
 - Clarification on existing guidance and procedures

Operating Experience Review Responsibilities

Project Manager Handbook Attachment 31

- Division of Responsibilities
 - Regional Inspectors
 - Use Inspection Procedure 71002
 - Perform inspections to verify the accuracy of information in the license renewal application, including operating experience
 - Verify that the applicant evaluated site-specific information and industry operating experience in determining aging effects
 - Headquarters Staff
 - Use the SRP-LR (NUREG-1800)
 - Review operating experience in the application
 - Issue a request for additional information (RAI), if information beyond the application is needed to determine whether the applicant has satisfied the acceptance criteria in the SRP-LR and the regulatory requirements of 10 CFR Part 54

Conclusion

- License Renewal Program Enhancements
 - Improved Report-Writing
 - Report Process Review
 - Consistency in Review of Operating Experience
- Follow-Up
 - Collect comments and suggestions
 - Update guidance 3 months after issuance of the Susquehanna SER or before, as necessary

Training

- Management expects training outside of this meeting to include reviewing the following materials:
 - OIG Audit Report
 - Presentation Slide Handouts
 - PM Handbook Attachment 9, Section 9
 - PM Handbook Attachment 29
 - PM Handbook Attachment 30
 - PM Handbook Attachment 31
- Completion Requirements
 - Before close of business on May 8, 2008, for staff involved with the Susquehanna safety review
 - Before close of business on May 22, 2008, for all other staff involved with safety reviews
 - On completing review of the materials, send an email to the RPOB Branch Chief and your branch chief
- TAC: ZT0000