



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
LISLE, ILLINOIS 60532

February 18, 2010

MEMORANDUM TO: Anne T. Boland, Director  
Division of Reactor Safety

THRU: Jamie Benjamin, Acting Chief /RA/  
Engineering Branch 2  
Division of Reactor Safety

FROM: Stuart Sheldon, Senior Reactor Engineer (Assessor)  
Division of Reactor Safety

SUBJECT: SELF-ASSESSMENT OF RIII LICENSE RENEWAL PROCESSES

From January 25 through February 5, 2010, the License Renewal Lead performed an assessment of the processes used to manage license renewal activities within RIII. Enclosed is the completed RIII License Renewal Processes self-assessment for your review.

This self-assessment revealed that the RIII processes for managing license renewal activities have been successful through 2009 and that the inspection staff has met the requirements of IMC 2515 and IMC 2516 for those plants that have applied for renewed licenses. No deficiencies were noted, however, several recommendations for improvement are suggested, which would streamline and aid preparation for inspections.

Enclosures:

1. RIII License Renewal Processes Self-Assessment
2. Proposed License Renewal Self-Assessment
3. License Renewal Team Lead Interview
4. License Renewal Team Member Interview

cc w/encls: C. Pederson, DRA  
S. West, DRP  
A. Boland, DRS  
J. Lara, DRP  
B. J. Holt, DRMA

CONTACT: S. Sheldon  
630-829-9727

## **RIII LICENSE RENEWAL PROCESSES SELF-ASSESSMENT**

### **Background**

A self-assessment was conducted from January 25 through February 5, 2010, to assess the process for planning and tracking license renewal (LR) activities; to assess the effectiveness of LR knowledge management activities; and to assess the effectiveness of LR training. There has not been a previous assessment of RIII LR activities.

### **Assessor**

Stuart Sheldon, Senior Reactor Engineer

### **Scope of Review**

This activity was initiated to assess the maintenance and use of LR planning tools in RIII, assess the effectiveness of knowledge management, and assess the effectiveness of training as outlined in the assessment proposal shown in Enclosure 2. The process was completed by reviews of current electronic documentation and through interviews with staff that have been involved in LR inspections. Enclosures 3 and 4 were used to capture notes from interviews with LR team leads and inspectors, respectively.

### **Findings**

This self-assessment revealed that the RIII process has been very successful through 2009 and that the inspection staff has met the LR requirements of IMC 2515 and IMC 2516 for those plants that have applied for renewed licenses. As there is always room for improvement, several recommendations are proposed to simplify and improve our processes.

### **Recommendations**

The following recommendations were made based on this assessment:

- LRC items should no longer be used to record the 71002 inspections in RPS. The current LRC items should be closed as the 71003 inspections are completed.
- Tracking sheets should be updated to include dates for preliminary contacts with licensees approximately 1 year prior to a 71003, and the Regional Administrator letter following 71002 inspections.
- A lead tracking checklist should be developed for license renewal inspections similar to the CDBI lead tracking checklist. This should include preliminary contacts and follow up activities.
- The LR staff should develop the training provided prior to the Kewaunee inspection as a canned training package if possible.

## Observations

### Maintenance and Use of LR Planning Tools

Region III maintains a license renewal folder on the DRS G:\ drive, which contains several tracking sheets that project inspection schedules and FTE requirements into the future for planning purposes. These files are revised based upon changes in scheduling requests and application submittals. The assessor found that the tracking sheets have been kept up to date and have been used extensively to answer calls for information and to schedule LR inspections and activities. They have the additional benefits of being accessible by all of the team leads and being routinely backed up. Tracking sheets show all inspections required for license renewal purposes by IMC 2515 and IMC 2516 have been completed to date.

The assessor reviewed these documents and found two weak spots. First, it was a challenge to determine the most recent revision. To facilitate a clear understanding, the assessor created an archive folder for all old revisions, leaving just the current revision in the main folder. The assessor also identified that the FTE projection contains information that is not contained in docketed correspondence, and is therefore, sensitive. The assessor updated the file to properly mark the pages in this file with the appropriate INFOSEC markings. These actions should be adequate to correct the problems.

The assessor reviewed the Reactor Planning System (RPS) as there are LR open items, called LRCs, therein. Some time ago, these items were entered in RPS to record 71002 inspection documents. They were intended to provide a tracking mechanism to ensure the 71003 inspections were scheduled. They have not been useful towards that end, as RPS does not implement a future scheduling function. All other inspections are tracked by the branch chiefs with tracking sheets. The LRC items are not opened and closed in the inspection reports like other URI type items are tracked. The information contained in each item is also a duplicate of the information in one of the G:\ drive tracking sheets. Since not all team leads have access to RPS, this information is duplicated, and it has no apparent usefulness, the assessor recommends the following:

- LRC items should no longer be used to record the 71002 inspections in RPS. The current LRC items should be closed as the 71003 inspections are completed.

Two activities that are not currently tracked anywhere are the preliminary contacts with licensees approximately 1 year prior to a 71003, and the Regional Administrator letter 30 days prior to the license approval.

- Tracking sheets should be updated to include dates for preliminary contacts with licensees approximately 1 year prior to a 71003, and the Regional Administrator letter.

### Effectiveness Of Knowledge Management

Knowledge management tools were found to be very effective in transferring information between inspection team leads. A specific strength observed, was the use of enlightened leadership reviews. Following the Prairie Island, Duane Arnold, and Dresden inspections,

the teams reviewed their performance with an enlightened leadership review. These reviews identified successes, areas for improvement, and suggestions for the next inspections. The team leads report that they have reviewed them and have made good use of the information in planning for the inspections.

There has been for some time, a boilerplate inspection plan for the 71002 inspections. One was also developed for the 71003 inspections during the Dresden inspection. Much of the administrative process is embodied in these boilerplates, and they are the primary knowledge management tools for passing information between inspections. Both team leads and inspectors appreciate these boilerplates and they should be maintained.

A reference CDROM was developed in 2001 by NRR/DLR, which contained copies of commonly used references for the LR inspections. An updated version was created locally in 2009 and distributed to LR inspectors. This was noted as a strength, as it is widely used by the inspectors and deemed beneficial. One inspector did not have it and noted that it would have been helpful. We should verify all inspectors have it prior to each inspection.

Much historical and reference information is also maintained on the DRS G:\ drive. This information is accessible by all of the team leads, and has been used by all team leads as reference material.

No deficiencies were noted in the knowledge management area. The assessor identified the potential for a new knowledge management tool. A lead tracking checklist such as the one used for CDBI inspections that calculates due dates for each administrative activity would be helpful.

- A lead tracking checklist should be developed for license renewal inspections similar to the CDBI lead tracking checklist. This should include preliminary contacts and follow up activities.

#### Effectiveness of training

One strength observed was the level of training provided to LR inspectors. There have been two classroom training sessions this year in addition to on-line training provided by NRR/DLR. Only one inspector did not have training or an observation inspection prior to being a LR inspection team member. This proved to be a challenge for this inspector, but is a notable exception to an otherwise positive area of performance. Several positive comments were received regarding the training that Caroline Tilton provided prior to the Kewaunee inspection. A resulting recommendation is:

- The LR staff should develop the training provided prior to the Kewaunee inspection as a canned training package if possible.

Several inspectors touted for the opportunity to observe on an inspection prior to assignment as a team member was very beneficial. This current policy should be maintained into the future.

## **Proposed License Renewal Self-Assessment**

### **Objectives:**

Assess the maintenance and use of LR planning tools in RIII

Are the status sheets up to date/used/effective?

Is RPS up to date/used/effective?

### Methods:

Update all of the status sheets, and identify any discrepancies.

Verify all follow-up items are in RPS, and identify any discrepancies.

Interview team leads as to effectiveness

Assess the effectiveness of knowledge management

Are the enlightened leadership notes used/effective?

Is the boilerplate planner beneficial?

Is it helpful to maintain the G-Drive folders?

### Methods:

Interview team leads

Assess the effectiveness of training

### Methods:

Interview team members to identify amount of training, use of guidance material.

### **Products:**

Document any identified deficiencies and recommendations for improvement in a concise report.

### License Renewal Team Lead Interview

Did you refer to:	Yes	Did it help? (comments)
Enlightened Leadership notes		
Planner Boilerplate		
RPS		
G: drive Folders		
Reference CDROM		

Would you like to see some other form of job aid?

Was your team appropriate for the inspection?

**License Renewal Team Member Interview**

Which training did you have prior to the inspection?

Classroom \_\_\_\_\_

On-line \_\_\_\_\_

Observation \_\_\_\_\_

Did you feel adequately prepared for the inspection?

Did you refer to:	Yes	Did it help? (comments)
Planner		
Reference CDROM		
Prior Reports		
Report Guidance		

Would you like to see some other form of job aid?

What guidance did you use for your input?

Do we need more guidance?

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DOCUMENT NAME: G:\DRS\WIP\Memo 021810 License Renewal Assessment 2010.doc

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NAME	SSheldon:ls		JBenjamin				
DATE	02/18/10		02/18/10				

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