

## Comment Resolution Form for IP 71111.21 – November 4, 2010

Source	Suggested change	Reason
RI	Section 02.01 Sample Selection - The 1st paragraph says to pick issues identified thru OpE process "identified in paragraph 02.01.h" There is no paragraph 02.01.h. That should be paragraph 02.02.d, which points to an internal website for a listing of prior INs and GLs related to CDBIs.	Incorporated the comments
RI	Section 02.03 Inspection Schedule Week 2 – says the Team Leader should conduct daily team meetings during the inspection prep week. While daily team are needed during the inspection, they are not an effective use of resources during prep. Suggest giving flexibility in having team meetings during prep week by changing to periodic or as needed. Also, the section says that the team leader shall ensure adequate and timely access to information being provided by the licensees through the internet is made available to team members – while some licensees provide information only through Certrec, others provide all of the information on CDs. Suggest dropping the wording “through the internet”.	<p>Integral part of a success preparation for the CDBI inspection is ensuring that each team member is properly prepared for the onsite portion of the inspection. Frequent and effective communication between team members is key to maximizing the team potential to identify risk significant issues. One avenue of effective and efficient communication is through conduct of team meetings to share information one inspector might have identified through his review which might be useful to other inspectors on the team. Comment to allow flexibility in having team meetings during prep week by changing to periodic or as needed was not incorporated.</p> <p>Deleted the phrase “through the internet: as recommended.</p>
RII	No additional comments provided; Comments provided during the pre-draft stage of the inspection procedure was incorporated.	N/A

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RIII	Section 02.01: First paragraph, last sentence is redundant in stating that the ‘resident inspectors on site’ and should be revised as follows: “...from the resident inspectors for possible components for inspection.”	Incorporated the comments
RIII	Section 02.01: First paragraph, 6 <sup>th</sup> line, the wrong paragraph # was identified, should be paragraph ‘02.02.d’ instead of paragraph ‘02.01.h’.	Incorporated the comments
RIII	Section 02.01: First bullet, add the following sentence for completeness as the next two bullets identify where additional guidance is located.  ‘See paragraph 02.01.a for more guidance on using the system based approach.’	Incorporated the comments
RIII	Section 02.01.c.1: There is a discussion of the three broad categories to be inspected for the scenario based approach (initiating event, mitigation equipment/function, and operator actions for using or recovering the mitigation equipment). Sections 02.01.c.2 and 02.01.c.3 discuss the first two categories; however there is no discussion of the third category ‘operator actions for using or recovering the mitigation equipment.’ For completeness, another section should be added to discuss the review of the third category.	Incorporated the comments; removed operator action as part of the mitigation equipment/function and there is no longer a third category.
RIII	Section 02.01.c.2: States the following: “Although performance deficiencies of this type screen Green under the ROP, identification and rectification of these errors/deficiencies are a benefit to the public and reduce public risk. Examples would include loose parts monitoring system of the RCS or secondary side radiation alarms.” This is not a true statement. Some PDs that affect IE frequency screen to Green in phase 1, but others do not. If the PD affects loss of offsite power or SGTR likelihood, it would not necessarily screen to green.  This statement implies that CDBIs only focus on greater than Green issues and components should not be selected unless they will result in a greater than Green issue. This statement is not necessary and should be deleted.	Incorporated the comments  Removed sentence: “Examples would include loose parts monitoring system of the RCS or secondary side radiation alarms.”
RIII	Section 02.01.c.3: We specifically call out Birnbaum importance measure in this section. Since it is not clear if all utilities use this measure, the sentence should be changed as follows; “Begin with the components importance measure, for example Birnbaum, to gauge its risk worth.”	Incorporated the comments

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RIII	Section 02.01.c, Example #2: Second paragraph, states that failure to run is more serious than failure to start due to the longer exposure time. Either this concept needs to be further discussed to explain the meaning (our SRAs were unclear as to the intent of the statement) or deleted.	Added additional clarification on why failure to run is more serious than failure to start
RIII	Section 02.01.c, Example #2: Second paragraph, states that failure of the suction valve is more important than failure of the discharge valve. Although this may be true in the classical sense for loss of suction, the majority of pumps have their suction valves open (except for alternative sources, which are interlocked or procedurally controlled with the pumps normally open suction valves) such that failure would be the result of mispositioning, an operational issue not a design aspect. This either needs to be discussed in more detail as to why this condition is a concern (from being able to recover the flow path prior to permanent damage) or deleted.	Added more detail in ways a suction valve can fail..
RIII	Section 02.01.c, Example #2: First paragraph, capitalize the word "Water" in the 1st line of the example or 'Feedwater' should be one word.	Incorporated the comments
RIII	Section 02.01.c, Example #2: Second paragraph, third sentence, make the word "itself" one word.	Incorporated the comments
RIII	Section 02.02.a.3: The last paragraph in section that starts with "Observe demonstrations..." should have a bullet in front of it?	Incorporated the comments
RIII	Section 02.02.b.2: It is not necessary to point out that an inadequate PM procedure could be a violation. This procedure should NOT include enforcement guidance.  Please remove statement.	Reference to enforcement guidance removed.

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RIII	<p>Section 02.02.b.7: The 3 bulleted items (as shown below) need to be revised to ensure proper grammar</p> <p>“... to verify that the licensee has:”</p> <ul style="list-style-type: none"> <li>• a PM program that includes these components</li> <li>• a PM program that is adequate and robust and incorporates accepted industry practices (e.g., R.G. 1.33)</li> <li>• <del>Licensee has</del> conducted an appropriate assessment for age-related issues for components installed beyond vendor-recommended life through periodic testing or an engineering evaluation that has accounted for environmental effects (elevated temperatures, humidity, harsh environments).</li> </ul>	Incorporated the comments
RIII	<p>Section 02.02.c: Outline is not in the order of importance. The 3<sup>rd</sup> item should be last (or not included at all.)</p>	Reordered the paragraphs
RIII	<p>Section 02.03: Please revise the first line “Preparation for the on-site preparation...” to “Preparation for the preparation/sample”</p> <p>Flexibility is given to the region on the next page. For consistency, allow the flexibility here also.</p>	Incorporated the comments
RIII	<p>Section 02.03: Last bullet regarding the team leader being given sufficient time to complete documentation of one inspection before the next inspection is NOT appropriate for an inspection procedure.</p> <p>Issues such as this should be discussed with the Branch Chief and NOT placed in guidance documents.</p>	Removed the last bullet
RIII	<p>Section 02.03: Last statement of this section “Regions should make reasonable efforts to develop the skills of region-based inspectors...” is NOT appropriate to be in this inspection procedure.</p> <p>This is a training/development issue NOT inspection guidance! Remove the statement.</p>	Removed the statement as recommended.
RIV	<p>Recommended all comments, as appropriate, which were provided in a mark-up of the inspection procedure attached to an e-mail from Harry Freeman, dated September 08, 2010.</p>	Incorporated the comments