

Summary of ROP Enhancement - Baseline Inspection Procedure Recommendations

The table provides a summary of the baseline inspection procedure changes proposed during the 2013-2014 ROP Enhancement Project

Inspection Area - Procedure	Budgeted Resource Change (hrs.)	Recommendations
Engineering - 71111.05 Fire Protection	0	No change recommended.
Engineering - 71111.06 Flood Protection	0	Provide more flexibility in the procedure by requiring three samples at the discretion of the inspectors.
Engineering - 71111.07 Heat Sink	0	Sample all types of heat exchangers. Add flexibility to split into two rotating inspections, inspecting each requirement every six years (one inspection would focus on heat exchangers incorporating aging management, the second would focus on service water and ultimate heat sink).
Engineering - 71111.17 Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications	0	Options for change include combining with 71111.18; moving technical guidance from 71111.18; change procedure name and broaden the objectives to include other mechanisms used to modify the plant (50.71(e), commercial grade dedication, 50.54(a), 50.90, EQ, IST, ISI, TS Ch. 5); close the triennial portion of the inspection at the end of the triennial cycle allowing timely inspection of modifications in years 2 and 3.
Engineering - 71111.18 Plant Modifications	0	See 71111.17.
Engineering - 71111.21 Component Design Bases Inspection	0	Reorganize to include deep design review, program reviews, and operating experience topics. Deep design review would delve into attributes such as aging, equipment replacement, and preventive maintenance/vendor recommendations. Program reviews would be based on trends identified by the resident inspectors or if a finding indicates a broader issue. Samples may be expanded to include emergency response facility, security or components not modeled in PRA. Operating Experience would provide smart samples. Close the triennial portion of the inspection at the end of the triennial cycle allowing timely inspection of modifications in years 2 and 3.

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Engineering – General (Training and Inspection Aids/Tools)	TBD	<ul style="list-style-type: none"> - Work with IMC 1245 working group to develop continuing/refresher training course for engineers focusing on engineering topics that are refreshed every three years. - Develop a standard request for information letter for team inspections. - Encourage counterpart groups to consistently handle latent vulnerabilities, identification of issues for training or generic communication, consistent approach in notifying licensees of planned inspections, share real time inspection issues and findings, develop central location for inspector aids, and support identification of smart samples. - Capture knowledge from Temporary Instructions, identify potential candidates for Information Notices, and incorporate lessons learned from Augmented/Special Inspections.
Maintenance - 7111.04 Equipment Alignment	0	Perform 2-4 samples per year on equipment that is currently out of service for maintenance or testing. Increase flexibility by removing quarterly and semi-annual sample requirements and making it an annual sample target. Improve inspection guidance. Institute a vertical slice review of an on-line maintenance activity for a risk-significant system or group of systems.
Maintenance - 7111.12 Maintenance Effectiveness	0	Institute a vertical slice review of an on-line maintenance activity for a risk-significant system or group of systems. Conduct a performance-based review of the implementation of quality processes during maintenance activities. Provide better guidance for performing PI&R samples. Include operating experience samples.
Maintenance - 7111.13 Maintenance Risk Assessment and Emergent Work Control	0	Revise Maintenance Risk Assessment and Emergent Work Control Inspection Guidance to include expectations for performing field verifications of risk management actions. Institute a vertical slice review of an on-line maintenance activity for a risk-significant system or group of systems.
Maintenance - 7111.19 Post-Maintenance Testing	0	Enhance guidance for the scope and detail of post-maintenance testing. Institute a vertical slice review of an on-line maintenance activity for a risk-significant system or group of systems.

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Maintenance - 71111.22 Surveillance Testing	0	Perform more detailed surveillance reviews and simplify sample requirements. Include operating experience samples, including aging management. Provide better guidance for performing PI&R samples. Institute a vertical slice review of an on-line maintenance activity for a risk-significant system or group of systems.
Inservice Inspection - 71111.08 ISI Activities	0	Perform some inspection at eddy current testing facilities, review updated ISI program during first outage after program takes effect, credit license renewal one time inspection, and incorporate inspection of vessel internal program.
Operability - 71111.15 Operability Determinations and Functionality Assessments	0	Consider moving the annual review of operator workarounds from IP 71152 to this IP.
Problem Identification and Resolution - 71152	0	Clarify/expand inspection guidance focusing on inspection of corrective action program (CAP). Change assessment process to include improving procedural guidance on how to assess a licensee's CAP and incorporating the outcome of the team inspection into the overall assessment of the plant. Resolve differences between bases for IP 71152 and IMC 0308.
Operations - 71111.11 Licensed Operator Requalification Program and Licensed Operator Performance	0	Consider changing the 4 hours per calendar quarter of control room observations to 16 hours per year and 4 different plant evolutions. Clarify assessment tools.
Radiation Safety - 71124 Radiation Safety - Public and Occupational	0	Increase flexibility between individual inspection procedures and with sample selection. Address open feedback forms.
Emergency Preparedness - 71114	0	No change recommended. 71114.07, "Hostile Action Event" may be revised based on ongoing lessons learned.
Safeguards – 71130	0	Incorporate NRR's approach to samples to include establishing minimum, nominal and maximum ranges. Reallocate resources to areas requiring additional oversight. Eliminate redundancies. Develop guidance for cyber security inspections. Continue to balance openness with safe and secure operations. All IP revised and issued for implementation 1/1/14.

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Other - 7111.01 Adverse Weather Protection	0	Capture site specific weather guidance in template, add more detailed review of design aspects of sites related to protection from adverse weather, review Fukushima and TI-187 lessons learned, and add more guidance for inspection due to impending tropical storms/hurricanes.
Other - 7111.20 Refueling and Other Outage Activities	0	Changes recommended include timing of review of outage worker schedules, clarification of containment closeout inspection requirements, and reference of other applicable IPs. Clarify requirement of inspection of BWR suppression pool strainers, definition of operations with the potential to drain the reactor vessel, purpose of containment entry, and expand guidance on heavy loads.
Other - 71151 Performance Indicator Verification	0	Evaluate licensee's MSPI reporting. (May require training).
Other - 71153 Follow-Up of Events and Notices of Enforcement Discretion	0	No change recommended.

Summary of ROP Enhancement – Special Topic Recommendations

The table provides a summary of the special topic changes proposed during the 2013-2014 ROP Enhancement Project

Special Topic	Budgeted Resource Change (hrs.)	Recommendations
Operating Experience	TBD	Implement an IP OpE Update Process to link recent OpE directly into individual IPs. The process would include a publicly available section.
Aging Management	0	Integrate aging management inspection guidance into each existing and applicable baseline inspection procedure. This may require additional technical guidance and training.
Fukushima Follow-up	.25	Identified enhancement to flood-related inspection procedures and generated feedback forms. Use information discovered during conduct of TI to assess potential ROP Changes.
Independent Spent Fuel Storage Installations	0	Integrate all aspects of the ISFSI operations into the ROP through the development of a new appendix to IMC 0609 SDP process associated with the construction and operation of an ISFSI. Develop a screening process that uses a series of logic questions to determine the level of safety significance of a finding. This will allow for all performance deficiencies to be assessed for cross-cutting issues. Develop a mechanism that would allow performance of inspections without needed regional administrator approval as currently required by Appendix C inspections.
Flexibility	0	No change recommended. (See security IP sample definition and specific inspection areas).