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RECIP.NAME RECIPIENT AFFILIATION
HINNANT,C.S. Carolina Power & Light Co.

96-06

SUBJECT: Confirms plans to conduct Integrated Performance Assessment Team insp at plant during period of 960603-14.

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CATEGORY 2 DOCUMENT

APRIL 30, 1996

Carolina Power & Light Company
ATTN: Mr. C. S. Hinnant
Vice President
H. B. Robinson Steam Electric Plant
Unit 2
3581 West Entrance Road
Hartsville, SC 29550

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT INTEGRATED PERFORMANCE ASSESSMENT PROCESS INSPECTION REPORT NO. 50-261/96-06

Dear Mr. Hinnant:

This is to confirm our plans to conduct an Integrated Performance Assessment Team inspection at H. B. Robinson Steam Electric Plant. The onsite inspection will be conducted by a team of four inspectors and a team leader during the period of June 3-14, 1996. The team leader will be Mr. Paul J. Kellogg from Region II.

Before visiting the Robinson site, the team will develop an integrated assessment of licensee performance based upon plant performance data and previously docketed information and will provide a report of this assessment to you by May 17, 1996. The preliminary conclusion developed during this assessment will be validated or modified based upon the onsite inspection in March.

The Integrated Performance Assessment Process (IPAP) is described in NRC Inspection Procedure 93808, a copy of which is provided as enclosure 1. To support the initial assessment of licensee performance that will be accomplished in the NRC Region II Office in Atlanta in May, we request that some of the information listed in enclosure 2 be provided to this office by May 16, 1996. The inspection team leader, Paul J. Kellogg, is available to answer questions regarding this request.

Sincerely,

ORIGINAL SIGNED BY
JOHNS JAUDON

Johns P. Jaudon, Deputy Director
Division of Reactor Safety

Docket No. 50-261
License No. DPR-23

Enclosures: 1. NRC Inspection Procedure 93808
2. Request for Information

cc w/encls: (See page 2)

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# INTEGRATED PERFORMANCE ASSESSMENT PROCESS (IPAP)

PROGRAM APPLICABILITY: 2515

SALP Category: OTHER

## 93808-01 INSPECTION OBJECTIVES

01.01 Develop an integrated perspective of licensee strengths and weaknesses based on an independent review of objective information from the results of previous inspections and plant performance reviews (PPRs), licensee event reports (LERs), performance indicators, enforcement history, the systematic assessment of licensee performance (SALP), senior management meeting results, and licensee documents.

01.02 Validate preliminary conclusions about licensee safety performance through an independent, performance-based, onsite inspection. Inspection areas include safety assessment and corrective action, operations, engineering, maintenance, and plant support.

01.03 Develop inspection recommendations based on the results of the independent review and onsite validation.

01.04 Develop feedback on the effectiveness of regulatory programs and their implementation.

## 93808-02 INSPECTION REQUIREMENTS

This procedure outlines a four-phase process for evaluating the safety performance of licensees that operate nuclear power plants. It also develops inspection recommendations that customize the inspection program for the following inspection period based on licensee strengths and weaknesses, and provides feedback to the region and program offices to improve the effectiveness and implementation of regulatory programs.

The first phase consists of a detailed review and integration of insights from various sources. An assessment team performs a preliminary assessment of licensee performance by reviewing inspection reports, PPR results, LERs, performance indicators, enforcement history, the SALP, senior management meeting results, and licensee documents. The results are presented in a performance assessment and inspection planning tree (Appendix A). The tree provides structure to the entire process and is divided into five main performance areas; safety assessment and corrective action, operations, engineering, maintenance, and plant support. These performance areas are further divided into discrete elements. Appendix B contains a list of

specific attributes for each element. The integrated review phase is typically 2 weeks in duration and culminates in the development of a preliminary performance assessment and inspection planning tree and a report documenting the results of the preliminary analysis.

The second phase consists of a site visit by an independent, multi-disciplinary assessment team. During this phase the assessment team challenges the results of the review phase through performance-based inspection. This phase is typically 2 weeks in duration and concludes with an exit meeting at the site.

The third phase consists of final analysis, developing inspection recommendations, and writing an assessment report. During this phase the performance assessment and inspection planning tree is finalized and inspection recommendations based on licensee performance are developed. The objective of the inspection recommendations is to identify, based on the assessment's results, areas for reduced or increased inspection. This phase is typically 1 to 2 weeks in duration for assessment team members and may be longer for the assessment team leader.

The fourth phase is an assessment of the effectiveness of regulatory programs. During this phase the results of the first three phases are analyzed to identify lessons learned on the effectiveness and implementation of NRC regulatory programs such as the inspection and SALP programs. At the conclusion of the fourth phase, the regional administrator (for IPAP efforts led by the regions) or an NRR manager (for IPAP efforts led by NRR) forwards a report summarizing the lessons learned to the Director, Office of Nuclear Reactor Regulation (NRR).

02.01 Planning. The integrated performance assessment process will be used and implemented by both the regions and NRR. Regional assessment teams will periodically conduct IPAP efforts at selected plants. NRR will conduct one IPAP effort in each region every year. When a decision has been made to perform an IPAP assessment, perform the following activities:

a. Assign an assessment team leader.

b. Assemble a multi-disciplinary assessment team.

c. Develop a schedule for the assessment.

d. Notify the licensee and announce the IPAP effort as a major activity in accordance with NRC Inspection Manual Chapter 0300.

e. Assemble the following documents and information that contain data on the plant's safety performance for approximately the previous 2 years (perform an information gathering visit to the site, if required):

1. NRC inspection reports (previous 2 years)
2. Plant performance review results (previous year)
3. Last SALP report
4. Enforcement history and trends (previous 2 years)
5. Licensee performance input to and results of senior management meetings (previous four meetings)
6. LERs (previous 2 years)
7. Individual plant evaluation and probabilistic risk assessment (IPE/PRA) information
8. Performance indicators (previous 2 years)
9. Human Factors Information System (HFIS)
10. Licensee self-assessment results
11. Licensee root cause evaluations
12. Licensee condition reports, maintenance work requests, and engineering work requests as needed
13. Licensee problem reports, corrective action reports, audits, or quality assurance surveillance reports as needed
14. Licensee business plans or other management evaluation reports as needed
15. Allegations
16. Institute of Nuclear Power Operations (INPO) plant evaluation reports (review during site visit) treating information in accordance with IP 71707 guidance

02.02 Integrated Review of Licensee Performance

a. Extract performance information from the documents and develop insights in each area of the performance assessment and inspection planning tree, noting licensee strengths and weaknesses.

b. Develop an initial evaluation of licensee performance in each element by weighing the strengths and weaknesses, and identify areas for follow up during the site visit. Rate the elements in accordance with the guidance in Section 03.02.b, below.

c. Brief the SALP board members (if assigned) or senior regional managers on the results of the integrated review of licensee performance to receive their insights and direction.

d. Document and provide to the licensee the results of the preliminary analysis of their performance at least 14 days in advance of the site visit. Include the preliminary performance assessment and inspection planning tree with the analysis provided to the licensee.

e. Prepare a site assessment plan using the results of the integrated review of licensee performance.

02.03 Site Assessment Visit

a. Conduct the site assessment visit.

b. Assimilate the performance insights from reviewing the documents with insights developed during the site assessment visit, noting licensee strengths and weaknesses.

c. Conduct an exit meeting at the conclusion of the site assessment visit or shortly thereafter at the region's discretion.

02.04 Final Analysis and Inspection Recommendation Development

a. Develop a final evaluation of licensee performance in each element by weighing the strengths and weaknesses. Rate the elements in accordance with the guidance in Section 03.02.b.

b. Develop inspection recommendations to address specific element ratings. Include the recommendations in the inspection report.

c. Brief the SALP board members (if assigned) or senior regional managers on the final IPAP results. Brief the Director, NRR on the results of the IPAP for those conducted by NRR.

d. Document the final results of the IPAP effort in an inspection report to the licensee. Include the final performance assessment and inspection planning tree with the inspection report.

e. Conduct a final exit meeting at the conclusion of the final analysis and inspection recommendation development phase, if necessary.

02.05 Assessment of Regulatory Programs

a. Analyze the results of the IPAP effort to determine if weaknesses in regulatory programs or their implementation existed at the site that was assessed.

b. Document the results of the analysis in a report from the regional administrator to the Director, NRR. Provide a copy of the report to the Chief, Inspection Program Branch, NRR. For those IPAP efforts conducted by NRR, document the results of the analysis in a report from the NRR division director to the Director, NRR. Also provide a copy of the report to the Chief, Inspection Program Branch, NRR.

93808-03 INSPECTION GUIDANCE

General Guidance

The integrated performance assessment process will be completed near (e.g., 4 to 8 months before) the end of a SALP period. This will enable the results of the assessment to be used in developing the SALP and changes to the inspection plan. The assessment team should brief the SALP board chairman and members following the integrated review phase and following the final analysis and inspection recommendation development phase. If the SALP board composition is not finalized at the time of the IPAP effort, regional managers should be briefed.

Ongoing agency efforts to incorporate risk-based methods into the inspection program will provide additional tools to more rigorously assess licensee safety performance, more fully integrate a risk perspective into the performance assessment process, and more efficiently focus NRC inspection efforts. NRR is in the process of transferring individual plant examination (IPE) insights to the regions, and a methodology for risk-based configuration management is expected to be completed by mid 1996, coincident with implementation of the requirements for the maintenance rule (10 CFR 50.65).

Specific Guidance

03.01 Planning

a. Because the IPAP relies on the team's ability to integrate numerous insights to diagnose licensee performance and determine the focus of the subsequent inspections, the team leader must be a senior inspector or manager with a broad perspective and a thorough understanding of the inspection program. Team members must also be inspectors or managers with a broad perspective and a thorough understanding of the inspection program.

b. A multi-disciplinary assessment team should be assembled during the planning phase. The team leader and four team members compose the recommended size for an IPAP assessment team. Regions may use additional team members, if required. Each team member is assigned to one performance area of the tree. The team leader may evaluate the safety assessment and corrective action area to help reduce the team size and resource impact of the IPAP.

The team must be carefully chosen to include participants who are not routinely involved in inspecting or reviewing the reactor plant that is being evaluated and who can contribute independent insights into licensee performance. Team continuity should be maintained throughout the process so that the insights gained in one phase are not lost in later phases.

c. The regions and NRR need to be mindful of the effect a major effort, such as an IPAP, has on licensee resources. The IPAPs will be scheduled to minimize their effect on the licensee by avoiding times when licensee resources are already burdened, such as during a short outage.

d. The licensee should be informed of the IPAP effort as early as possible. The effort will be announced as a major activity at least several months in advance. The letter informing the licensee of the IPAP assessment also may request the licensee documents needed by the team.

e. The documents collected will provide performance-related information for the previous 2 years. The team leader should use his/her discretion in collecting documents that are issued infrequently. Documents can be obtained from NUDOCS, the NRR project manager, the senior resident inspector, an information gathering visit to the site, or requested from the licensee by letter.

03.02 Integrated Review of Licensee Performance. This diagnostic phase of the IPAP is one of the most significant parts of the process. In this phase, the IPAP team members review and amalgamate information on licensee performance to identify performance insights that may have been overlooked during the normal implementation of regulatory programs. The importance of this phase must be clearly understood by all IPAP team members.

a. The time needed to review licensee performance information will vary, but will typically be 2 weeks. To lessen the impact of the IPAP on inspection resources, the regions may choose to collect and analyze information before the review phase and integrate the review phase with other ongoing activities. However, regional managers must ensure that independence, objectivity, and continuity of the assessment team are preserved. The regions must

not delegate complete responsibility for the review to individuals who are responsible for the routine inspection and oversight of the site.

Team members should extract strengths and weaknesses from the documents. A systematic means of analyzing the data should be used to organize the strengths and weaknesses and assign them to the elements of the performance assessment and inspection planning tree. Several regions have developed methods for collecting, collating, and analyzing the data reviewed, including computer database programs designed specifically for the IPAP. The regions are encouraged to use any tools available to assist the teams in assessing the performance data.

b. The following categories are used to rate the elements. For the final assessment, those elements still considered ***indeterminate*** should be rated ***increased inspection***.

1. **REDUCED INSPECTION** (green). Licensee attention and involvement are properly focused on safety and result in a superior level of performance. The NRC will strongly consider reducing inspection effort.

2. **MAINTAIN INSPECTION** (none). Licensee attention and involvement are normally well focused and result in a good level of performance. The NRC will consider maintaining its level of inspection effort.

3. **INCREASED INSPECTION** (blue). Licensee attention and involvement are often not well focused and performance suffers. The NRC will strongly consider increasing inspection effort and focus in these elements.

4. **INDETERMINATE** (yellow). The information available was insufficient, or inconsistent, and an evaluation could not be completed. The assessment team must carefully review areas rated ***indeterminate*** to determine the cause for the insufficiency of information (inspection program, implementation, etc.) and include these determinations in a report assessing the regulatory programs.

Appendix B lists the attributes to be considered for each element. Team members may consider other attributes than those listed. In many cases they may be able to evaluate elements without addressing all the attributes. However, it is extremely important that areas be rated ***indeterminate*** if insufficient information is available for an evaluation. This rating will give valuable insights about the adequacy and implementation of the inspection

program.

The team will meet to reach a consensus on the ratings in each element once all members have completed their reviews and characterized licensee performance in their assigned elements. Do not rate the overall areas–safety assessment and corrective action, operations, engineering, maintenance, and plant support–during the review phase. Ratings in the overall areas will be assigned during the final analysis and inspection recommendation development phase.

c. SALP board members (if assigned) or senior regional managers are briefed to provide the results of the integrated review of licensee performance and to seek additional guidance in preparing for the site assessment visit. The IPAP team leader should incorporate guidance from the SALP board members or regional managers into the site assessment plan.

d. The preliminary results of the integrated review of licensee performance are provided to the licensee via a report at least 14 days before the site visit. The report will be sufficiently detailed to provide the licensee with a clear indication of the preliminary results of the team evaluation based on the review conducted to date. The purpose of providing the report to the licensee in advance of the site visit is to ensure that the licensee is aware of areas where the team perceives problems to exist and where the team needs to probe further. The report needs to provide sufficient bases in the areas the team has found ***indeterminate*** to give the licensee an understanding of why the team has reached its preliminary results. The report should address each element but be sufficiently concise to minimize the impact on the team's review activities. The preliminary performance assessment and inspection planning tree will be provided to the licensee.

e. The site visit is intended to validate the insights on licensee performance developed in the review phase and will determine areas where future inspections may or may not be warranted. The team should not attempt to resolve all issues, but will inspect in areas to the extent necessary to gauge overall licensee performance and decide what inspection effort will be recommended during the upcoming SALP cycle. The team members should follow up issues and concerns noted during the review phase. However, the assessment team will also look for areas where performance insights, based on the preliminary analysis, may have been missed or inadequately developed. These insights will be reflected in the site assessment plan.

03.03 Site Assessment Visit. The purpose of the site visit is to verify the accuracy of the assessment from the review phase, with particular emphasis on reaching a definitive conclusion on areas that were rated ***indeterminate***. This will be accomplished through performance-based inspections that focus on the areas the team has preliminarily determined to be ***indeterminate*** or ***increased inspection*** areas.

a. The site assessment visit will last about 2 weeks. During the entrance meeting the team leader will briefly discuss the results of the integrated review and the plan for the assessment team's site visit.

b. No inspection guidance.

c. During the exit meeting, the team leader will inform the licensee of preliminary findings and results in general terms that highlight significant licensee strengths and weaknesses. In addition, the team leader will describe the remaining process.

03.04 Final Analysis and Inspection Recommendation Development. Once conclusions are finalized, the assessment team will develop detailed inspection recommendations for the next inspection period. These recommendations serve to focus increased inspection effort in areas of licensee weaknesses and reduced inspections in areas of licensee strengths. This phase is also very important to the overall success of the IPAP. Issues that are identified during the first two phases often need formal inspection followup during the next inspection period.

a. If not done during the site visit, the assessment team will meet after the site visit to reach a consensus about licensee performance and develop the final performance assessment and inspection planning tree. The elements are rated in accordance with the guidance in Section 03.02.b, above. In rating each element, the team should balance the strengths and weaknesses within the element. After rating all the elements, the team will evaluate the overall performance in each functional area by considering each element and its effect on the overall safety performance in the functional area.

b. In conjunction with evaluating each element and the overall area, the team will determine future inspection activities. The following guidance is to be used in determining the general level and focus of inspection recommendations:

1. **REDUCED INSPECTION**. Reduce the functional area inspection effort to levels below that of the previous inspection period. The inspection resources can be reduced for the elements and associated attributes that were rated ***reduced***

***inspection***, minimizing regional initiative inspection resources in these functional areas. The inspection resources will be focused on elements and associated attributes rated ***increased inspection***.

2. **MAINTAIN INSPECTION**. Set the functional area inspection effort to the level of the previous inspection period. Emphasize elements and associated attributes rated ***increased inspection***. De-emphasize elements and associated attributes rated ***reduced inspection***. Use regional initiative resources as necessary to inspect elements and attributes rated ***increased inspection***.

3. **INCREASED INSPECTION**. Increase the functional area inspection effort to levels above that of the previous inspection period. Focus on elements and attributes rated ***increased inspection***. Consider special inspection efforts such as independent inspection of the element or attribute, or team inspections in the functional area containing the element. Use regional initiative resources to inspect elements and associated attributes rated ***increased inspection***.

Areas that the team still finds to be ***indeterminate*** after the onsite inspection should be rated as ***increased inspection*** with the team providing associated inspection recommendations for the elements or attributes. Determine why the area was rated ***indeterminate*** (inspection program weakness or implementation weakness) and make recommendations for changes to the inspection program.

c. No inspection guidance.

d. The assessment team will write an assessment report that summarizes its conclusions and the recommended overall level of inspection to be devoted to each functional area. The report will also contain the conclusions reached about each element along with recommendations for future inspection activities. The report must be sufficiently detailed to enable inspectors doing future inspections to clearly understand the concerns that prompted the recommended inspection activities and the expected focus and level of effort for those activities. The report should fully explain any differences between the preliminary and final performance assessment and inspection planning trees.

Although violations (or other follow-up items) may be identified by the assessment team, they should not obscure the integrated assessment of performance. Therefore, violations and follow up

items should be passed on to the resident inspectors or documented in a special inspection report whenever possible.

A copy of the final report issued for assessments conducted by NRR will be sent to the associated regional administrator.

e. Regional or NRR management may decide that it is necessary to conduct a final exit meeting with the licensee following the conclusion of the IPAP effort. This additional exit meeting is particularly important if significant weaknesses were identified that were not previously highlighted. If a final exit meeting is held, it should normally be a public meeting.

03.05 Assessment of Regulatory Programs. IPAP efforts provide a valuable opportunity to independently evaluate the performance of NRC regulatory programs. Following the completion of the IPAP effort, the assessment team should prepare a report describing any weaknesses identified in regulatory programs or in implementation of those programs.

a. The assessment team members will provide information to the team leader on program-related and implementation-related issues identified during the assessment. This information will include differences between the inspection record and actual licensee performance, performance issues that were identified by the team but were not in the inspection record, or issues that were incompletely documented in the record. Information on program effectiveness may be solicited from the resident inspectors to obtain their perspective.

The regulatory program assessment will focus on weaknesses in the inspection, SALP, and other regulatory programs; weaknesses in implementation of those regulatory programs; weaknesses in the inspection procedures; and weaknesses in NRC management oversight of the regulatory programs.

The following questions, as a minimum, will be addressed:

- Were issues identified that were not previously recognized?
- Was the inspection record complete and accurate?
- Were inspection reports from the divisions of reactor projects and reactor safety consistent in their characterization of the licensee's performance?
- Were inspections that followed up on issues complete and sufficiently detailed to justify closure of the issues?
- Were the inspection reports of good quality and in accordance with requirements?
- Were enforcement actions appropriate and in accordance with requirements?

b. The assessment team shall document general findings, concerns, recommendations, and a listing of specific findings in a letter report. The letter report will be issued within 2 weeks after the issuance of the final assessment report. Validation of the concerns and corrective actions will be the responsibility of the regional office and NRR program office associated with the concern.

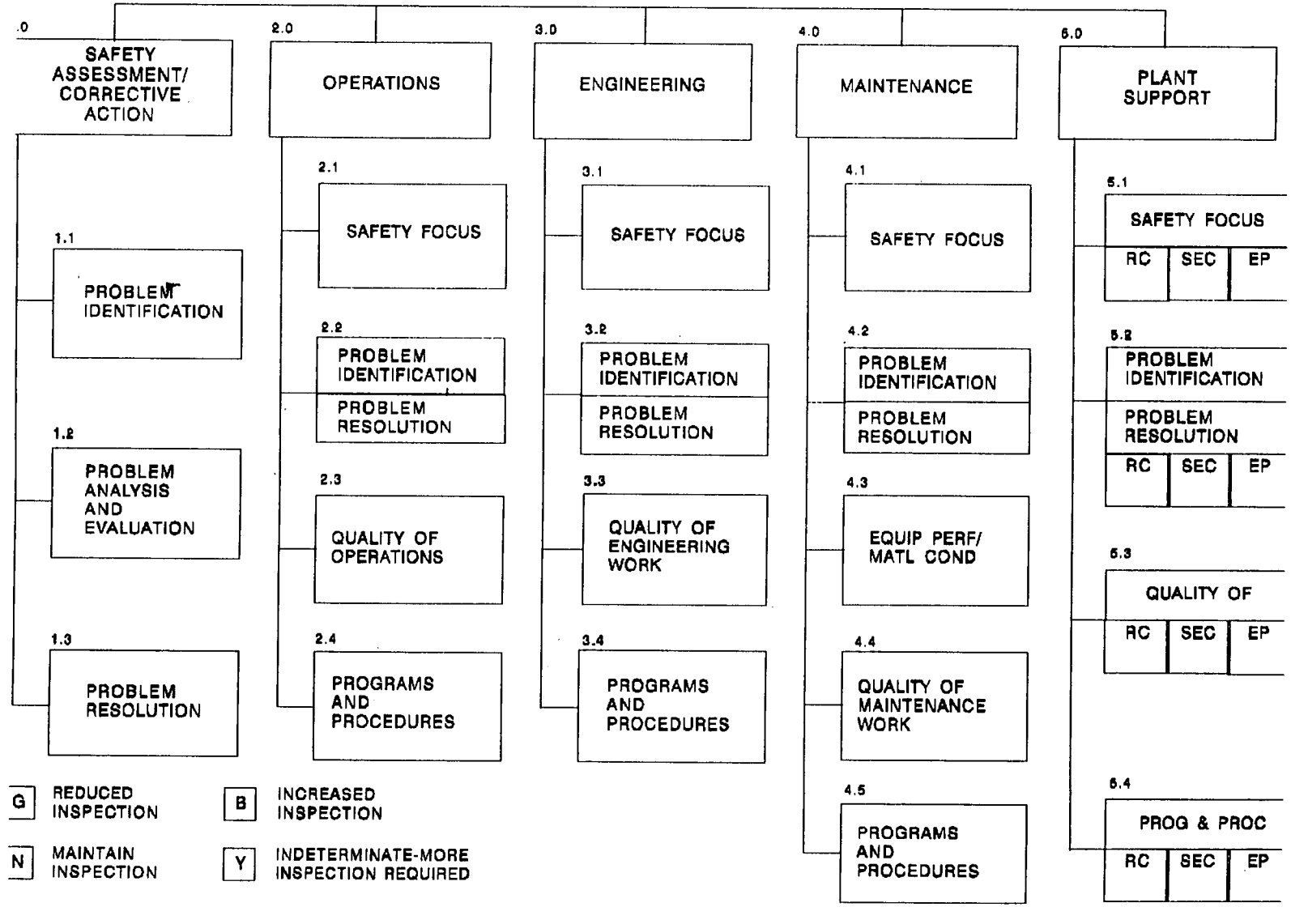
93808-04 INSPECTION RESOURCES

Each assessment is planned for 6 weeks for five persons with 2 of the 6 weeks for on-site inspection (an accumulative on-site total of 10 staff weeks, approximately 400 hours of direct inspection effort), 2 weeks for in-office inspection preparation, and 2 weeks for report writing. With expected additional effort by the team leader, the resource allocation typically totals 30 to 40 staff weeks. This total includes preparation, inspection, and report writing.

END

# PERFORMANCE ASSESSMENT/INSPECTION PLANNING TREE

## ASSESSMENT OF LICENSEE PERFORMANCE




APPENDIX B

SPECIFIC ELEMENT ATTRIBUTES AND NRC INSPECTION MANUAL CROSS REFERENCES

The following attributes are evaluated to determine the assessment rating to be assigned to the elements. Several major regional initiative inspection procedures are identified for the elements within the SALP functional areas. Associated core inspection procedures are identified with the attributes within the SALP functional areas.

## 1.0 SAFETY ASSESSMENT/CORRECTIVE ACTION

1.1 Problem Identification *Core IP: 40500*

- Site-wide process for documentation of problems
- Self-assessment (line organizations)
- Independent assessment (QA/QC/ISEG/safety review committees)

1.2 Problem Analysis and Evaluation *Core IP: 40500*

- Root cause analysis
- Trending and evaluation of the site-wide problem identification program
- Trending to identify recurring equipment problems
- Onsite and off-site review committee evaluations

1.3 Problem Resolution *Core IP: 40500*

- Corrective action effectiveness and timeliness
- Responsiveness to self-assessment findings
- Responsiveness to external organization findings (NRC, vendors)
  - NRC generic letters, bulletins, and information notices
  - vendor bulletins and recommendations
  - generic applicability of issues at similar plants
- Responsiveness to QA findings
- Responsiveness to event identified issues

## 2.0 OPERATIONS

2.1 Safety Focus *Initiative IPs: 71715, 93802, 93806*

- Conservative operating decisions IP 40500
- Conservative operability determinations IP 40500
- Coordination of activities (online maintenance and LCO management) IP 62703
- Comprehensiveness of pre-activity briefings
- Consideration of shutdown risk (eg., coordination of activities to minimize shutdown risk) IP 62703
- Thoroughness of review to ensure readiness of equipment for return to service IP 62703
- Management communication of expectations IP 71707
- Frequency, duration, and effectiveness of management visits to the control room and plant IP 71707
- Management involvement in decision making IP 40500
- Inter-departmental communications IP 71707
- Staffing stability IP 71707
- Overall technical and safety review programs

2.2 Problem Identification/Problem Resolution

**Problem Identification** *Initiative Ips: 71500, 92700, 92720, 93802, 93806*

- Existence of easy to use process for documentation of problems IP 40500; IP 71707
- Effectiveness of self-assessments IP 40500; IP 71707
- Plant deficiencies noted during operator rounds IP 71707

**Problem Resolution** *Initiative Ips: 35702, 71500, 71715, 92720, 93802*

- Resolution of long standing, repetitive, or similar concerns IP 40500; IP 71707
- Existence of work-arounds, temporary procedure changes, temporary jumpers, nuisance alarms (tolerance of potentially unreliable conditions, equipment, etc.) IP 40500; IP 71707
- Responsiveness to external and internal assessment findings IP 40500; IP 71707

2.3 Quality of Operations *Initiative Ips: 41500, 50001, 71715, 93802, 93806*

- Performance during routine evolutions IP 71707; IP 71001
- Performance during outages IP 71707
- Performance during events and response to abnormal alarms IP 71707
- Comprehensiveness of shift turnovers and logs IP 71707
- Quality of training (operator initial examination results) IP 71001; IP 41500
- Operations coordination with other site groups (engineering, maintenance, training) IP 71707
- Interdepartmental and intradeparmental communications
- Oversight and control of maintenance, engineering, and outage activities IP 71707
- Control of clearances and equipment out of service IP 71707
- Control of troubleshooting activities IP 71707
- Feedback of human factors conditions

2.4 Programs and Procedures *Initiative Ips: 42001, 42452, 42700, 71500, 71715, 93801, 93802*

- Procedure revision backlog IP 71707
- Procedural adequacy and usage (routine) IP 71707
- Procedural adequacy and usage (emergency operating procedures) IP 71707
- Use of night orders, administrative limits, and management instructions IP 71707
- Equipment status, valve lineups IP 71707
- Operating experience review and feedback of lessons learned IP 40500

3.0 **ENGINEERING**

3.1 Safety Focus *Initiative Ips: 93801, 93803, 93807*

- Involvement in operability determinations IP 37550
- Conservative operability determinations IP 40500
- Staffing stability and depth IP 37550
- Communication of management expectations IP 37550

- Management involvement in decision making IP 37550; IP 40500
- Overall technical and safety review programs

3.2 Problem Identification/Problem Resolution

**Problem Identification** *Initiative Ips: 37001, 72302, 90714, 92700, 92702, 93801, 93802, 93804*

- Existence of easy to use process for documentation of problems IP 37551; IP 40500
- Effectiveness of system engineering function in identification of problems
  IP 37550; IP 37551; IP 40500
- Effectiveness of self-assessments IP 37550; IP 37551; IP 40500

**Problem Resolution** *Initiative Ips: 35702, 92720*

- Resolution of long standing, repetitive, or similar concerns IP 37551; IP 40500
- Effectiveness of engineering work priority system IP 37550
- Status and priority of the backlog of engineering work IP 37550; IP 40500
- Responsiveness to self-assessment findings IP 37550; IP 37551; IP 40500
- Effectiveness of system engineering function in resolution of problems IP 37550; IP 37551; IP 40500

3.3 Quality of Engineering Work *Initiative Ips: 37700, 37828, 72701, 93801, 93803, 93807*

- Corrective actions for identified deficiencies IP 37550; IP 37551
- Modification quality/instructions IP 37550; IP 37551
- Licensing submittals (licensee event reports, operability assessments, amendment requests, relief requests, exemption requests) IP 37550
- Drawing changes and accuracy IP 37550
- Quality of training
- Interdepartmental and intradepartmental communications
- Use and solicitation of feedback of human factors conditions

3.4 Programs and Procedures *Initiative Ips: 35701, 37702, 37703, 38701, 38702, 39701, 39702, 40702, 40704, 90714*

- Procedural adequacy and usage IP 37550
- Design engineering IP 37750
- System engineering IP 37550
- Maintenance engineering IP 37550
  - post-modification testing IP 37550
  - ISI/IST program IP 73753
- MOV program
- Erosion corrosion program
- Heat exchanger monitoring program
- Vibration monitoring
- Thermal monitoring program
- Procurement engineering IP 37550

4.1 Safety Focus

- Prioritization of work activities IP 62703
- Return of equipment to service IP 62703
- Comprehensiveness of pre-activity briefings
- Consideration of shutdown risk (e.g., coordination of activities to minimize shutdown risk) IP 62703
- Outage planning IP 71707
- Management communication of expectations IP 62703
- Frequency, duration, and effectiveness of management observations and oversight of work activities IP 62703
- Management involvement in decision making IP 62703
- Staffing stability IP 62703
- Coordination with other departments IP 61726; IP 62703
- Overall technical and safety review programs

4.2 Problem Identification/Problem Resolution

**Problem Identification** *Initiative Ips: 90714*

- Existence of easy to use process for documentation of problems IP 40500; IP 71707
- Effectiveness of self-assessments IP 40500; IP 61726; IP 62703; IP 73753
- Root cause analysis IP 40500; IP 61726; IP 62703; IP 73753
- Trending (repeat maintenance) IP 62703

**Problem Resolution** *Initiative Ips: 35702, 92720*

- Resolution of long standing, repetitive, or similar concerns IP 40500; IP 61726; IP 62703; IP 73753
- Status and priority of the backlog IP 40500; IP 62703
- Responsiveness to external and internal assessment findings IP 40500; IP 62703

4.3 Equipment Performance/Material Condition *Initiative Ips: 62700*

- Plant material condition IP 62703; IP 71707
- Pump performance
- Valve performance (repetitive failures)
- Electrical system performance
- System status IP 62703

4.4 Quality of Maintenance Work *Initiative Ips: 62700, 62704, 62705*

- Work practices IP 61726; IP 62703
  - foreign material exclusion
- Maintenance and test equipment control IP 62703; IP 73753
- Quality of training and results IP 62703
- Recurring problems IP 62703
- Interdepartmental and intradepartmental communications
- Feedback of human factors conditions

4.5 Programs and Procedures *Initiative Ips: 62702, 62704, 62705, 93805*

- Procedural adequacy and usage IP 62703; IP 61726; IP 61726; IP 73753
- Preventive maintenance IP 62703; IP 61726; IP 61726; IP 73753
  - risk insights
- Corrective maintenance IP 62703; IP 61726; IP 61726; IP 73753

- risk insights
- Corrective maintenance IP 62703; IP 61726; IP 61726; IP 73753

## 5.0 PLANT SUPPORT

5.1 Safety Focus *Initiative Ips: 82702, 83522*

- Coordination and control of daily activities
- Comprehensiveness of pre-activity briefings
- Management communication of expectations IP 64704
- Frequency, duration, and effectiveness of management observations and oversight of work activities IP 64704
- Management involvement in decision making IP 40500; IP 81700
- Staffing stability IP 64704
- Coordination and communication with other departments
- Overall technical and safety review programs

5.2 Problem Identification/Problem Resolution

**Problem Identification**

- Existence of easy to use process for documentation of problems IP 40500; IP 64704
- Effectiveness of self-assessments IP 40500; IP 64704; IP 81700; IP 83750

**Problem Resolution** *Initiative Ips: 92720*

- Resolution of long standing, repetitive, or similar concerns IP 40500 ; IP 64704; IP 81700; IP 83750
- Status and priority of the backlog IP 40500
- Responsiveness to external and internal assessment findings IP 40500

5.3 Quality of Radiological Controls, Security, and Emergency Preparedness

**RC** *Initiative Ips: 80521, 80721, 83523, 83525, 83526, 83724, 83725, 83726, 83728*

- Surveys IP 71750; IP 83750
- Radwaste; person-rem average; effluents
- Exposure control
- Radiation work control and worker practices IP 71750; IP 83750
- ALARA IP 83750
- Coordination in job planning IP 83750
- Quality of training and results IP 83750
- Interdepartmental and intradepartmental communications
- Feedback of human factors conditions

**SECURITY** *Initiative Ips: 81042, 81084, 81088, 81501*

- Audits, corrective actions, and management support IP 81700
- Access authorization program IP 81700
- Management controls IP 81700
- Quality of training and results IP 81700
- Interdepartmental and intradepartmental communications
- Feedback of human factors conditions

**EP** *Initiative Ips: 82201, 82202, 82203, 82205, 82206, 82207*

- Quality of drills IP 71750

- Accident assessment and classification IP 82701
- Activations IP 82701
- Response to UEs, Alerts, etc. IP 82701
- Quality of training and results IP 82701
- Interdepartmental and intradepartmental communications
- Feedback of human factors conditions

5.4 Programs and Procedures *Initiative Ips: 81018, 81034, 81401*

- Procedural adequacy and usage IP 64704; IP 82701
- Individual programs are covered under element 5.3

REQUEST FOR INFORMATION

Information Needed Prior to May 16:

1. Listing of all pumps and valves that were in an Alert status pursuant to ASME Section XI for the last two years - how long they stayed there and how they got out of "Alert." Also, all pumps and valves determined inoperable under ASME section XI testing for the last two years - how long they were inoperable and what actions were taken to return the valve or pump to operability

2. Management and supervisory changes and Reorganizations since June 1, 1995, in operations, maintenance, chemistry, health physics, training, planning and scheduling, on-site engineering, off-site engineering applicable to the Robinson, QA

3. Limiting Condition for Operations Logbook (June 1, 1994 - present)

4. Listing of QA audits (June 1, 1994 - present) with a listing of the corrective actions to the audits and their present status.

5. A brief description of each plant modification implemented since June 1, 1994

6. Present listing of outstanding requests for engineering assistance and when they are scheduled to be acted upon

7. Current listing (and trend analysis if available) of all temporary modifications installed in the facility, when and why the modification was installed

8. System engineer reports (June 1, 1994 - present)

9. Any data or trend analysis providing information regarding equipment reliability or availability (June 1, 1994 - present). The equipment predictive or monitoring reports may provide this information

10. Any periodic performance reports to Operations Manager, Plant General Manager, Site Vice President, Nuclear Assessment Manager, Emergency Planning & Radiaton Control Manager, Engineering Support Manager, Site Suppport Services Manager (June 1, 1994 - present)

11. Any document describing the station safety goals and how well they are being met (June 1, 1994 - present)

12. A listing of condition adverse to quality reports (1994 - present) with copies of the ten most recent reports

13. Listing of five oldest equipment tagging entries, when the equipment was tagged out of service and why they exist

14. Listing of failed surveillances in last 2 years (failed means the test had to be re-run to meet the acceptance criteria or the acceptance criteria changed to accept the test results)

15. Provide a list of any evolution that has been identified for increased attention because of high risk, infrequent performance or other vulnerabilities.

16. Listing of current "operator workarounds"

17. Listing of those valves that failed their last LLRT, whether they had failed before, and what corrective actions were taken

18. Results of TS 4.4.2.1 leakage program for last 2 yrs.

19. Percentage (or other characterization) of maintenance rework (1994 - present) and how rework is defined

20. Listing of your present maintenance backlog and any trend analysis of the backlog if available

21. Listing of all work requests against fire protection (suppression and detection) systems since 1/95

22. Offsite review board meeting minutes (1995 - present)

26. Any trend and/or analysis reports from reviewing the corrective action program (1994 - present)

27. Data or analysis of personnel contamination reports (1994 - present)

28. Last Refueling Outage Critique Reports for each unit

29. ALARA reports for last two years (if any exist)

30. Organizational Self-Assessments in operations, maintenance, modifications, health physics, chemistry, fire protection, engineering, QA, corrective action, training (1994 - present)

31. Reports from visiting vendors since June 1, 1994

32. Last two years of EP drill/exercise critiques

33. Data and\or analysis of switchyard equipment reliability, copies of preventative and predictive maintenance procedures that apply to this equipment and, their frequency of performance

Information to be available onsite on June 3:

1. Matrix of Technical Specification surveillance requirements to Hatch surveillance procedures

2. Operations Crew Composition (1994-present)

3. Crew Schedule during power operations and refueling (since 1994)

4. Listing of annunciators out of service or malfunctioning for last two years and why they have yet to be repaired if still out of service

5. Administrative controls procedures for Conduct of Operations, Maintenance, Equipment Tagging, Modifications, Technical Specification surveillances, and Equipment Testing

6. One full sets of P&Ids

7. Fire Watch Logbook since 1/95 (if one exists)

8. Reports or analysis of contractor performance during the last refueling outage