



U.S. Nuclear Regulatory Commission  
Office of Executive Director for Operations

## OEDO Procedure

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### New

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Office Procedure No.: **OEDO Procedure - 0220**  
Procedure Title: **Coordination with the Institute of Nuclear Power  
Operations (INPO)**  
Effective Date: **July 24, 2006**  
Approved By: **Luis A. Reyes, EDO**  
Date Approved: **July 24, 2006**  
Section Assigned Ownership: **Technical and Regional Programs Section**

**Comments:**

Training/Special Instructions: **None**  
ADAMS Accession No.: **ML062000752**

### 3.2 Inspection Activities

Appendix 2 to the MOA addresses coordination of NRC and INPO inspection and evaluation activities. Coordination of inspection activities is conducted to avoid creating unnecessary burden on licensees by conducting simultaneous large scale INPO and NRC activities at the same site. The NRC makes its inspection schedules publically available every six months, in part, to maximize the efficient use of NRC and licensee resources. INPO provides monthly updates of their inspection schedule electronically to the OEDO INPO Coordinator. This schedule should be provided as soon as possible to designated representatives in the Offices of Nuclear Reactor Regulation (NRR) and Nuclear Security and Incident Response (NSIR) and the Regional Offices to be used in inspection planning. Conflicts in inspection schedules will be resolved between the OEDO INPO Coordinator, the affected Office/Region, and the INPO Industry and External Relations staff. Conflicts that cannot be resolved at that level should be escalated to the DEDR for resolution.

The MOA makes provisions for NRC to observe INPO evaluation activities and for INPO to observe NRC inspections. The DEDR is required to approve and coordinate NRC staff participation in INPO evaluation activities and INPO participation in NRC inspection activities.

### 3.3 NRC Use of INPO Documents

It is in the best interest of the NRC that INPO be able to conduct plant evaluations and assistance visits in an effort to improve nuclear safety. In addition to evaluations and assistance visits, INPO identifies and tracks significant technical issues through the Significant Operating Event Report (SOER) and Significant Event Report (SER) programs. INPO also manages and implements the accreditation of licensee training programs. The NRC should ensure that these INPO programs remain independent from the NRC inspection program to the maximum extent possible. The following guidelines should be adhered to regarding INPO documents:

- INPO findings, recommendations, and corrective actions should not be referenced in NRC inspection reports, mid-cycle and end-of-cycle reviews, Plant Issues Matrices (PIM), or other agency documents unless the issue is of such safety significance that no other reasonable alternative is acceptable. INPO findings, recommendations, and the licensee's corrective actions for these items should not normally be tracked by the NRC. If the issue warrants tracking, it should be independently evaluated, documented, and tracked as an NRC issue.
- Resident inspectors should promptly read site-specific INPO evaluation and accreditation reports as part of their licensee monitoring and evaluation activities. The objective of this review is to determine if the results identify safety or training issues not previously identified by NRC evaluations. The fact that such a review has been conducted and

- NRC inspectors should not normally attend INPO site meetings as this could unnecessarily limit the communications exchange between the licensee and INPO.
- The staff should not focus on the INPO-assigned ratings or pressure licensees to supply that information. If necessary, requests for ratings will be made to INPO through the OEDO INPO Coordinator.
- Under no circumstances will the NRC withhold or delay follow-up actions on issues involving public health and safety issues.
- The DEDR will be notified by the Regional Administrator when NRC followup of INPO findings is necessary to ensure safety. Followup activities will be governed by Inspection Procedure 71111.

The OEDO INPO Coordinator should be alert to reports of NRC inspection activity related to findings in INPO evaluations. The OEDO INPO Coordinator should discuss such reports with associated regional management to identify any issues relative to the MOA. The OEDO INPO Coordinator should make the DEDR aware of all reports of inappropriate followup activities to allow the DEDR to coordinate evaluation of the issues as necessary.

### **3.5 INPO Senior Nuclear Plant Manger (SNPM) Training Sessions**

Approximately four times a year, INPO conducts a training course for prospective senior nuclear plant managers. As a part of this course, NRC hosts the class for one day. The OEDO INPO Coordinator is the focal point for coordination of the SNPM training activities hosted by the NRC. Historically the sessions have included a tour of the Operations Center and meetings with the EDO, DEDOs, Directors of NRR and NSIR, and the Commissioners to discuss items of interest.

At the time of the last SNPM training session for the year, the OEDO INPO Coordinator should request the projected schedule for the next year and make these dates known to the secretaries for the EDO and DEDOs, each Commissioner, SECY and appropriate Office Directors.

About three months before the training session, the OEDO INPO Coordinator should arrange for a conference room for the entire day of the meeting of sufficient size to accommodate 12 to 15 participants, 2 INPO, and as many as 5 NRC managers.

Two to three months before the class, the OEDO INPO Coordinator should gain commitments from the NRC participants and establish the schedule of events for the day of the class. The agenda should be provided to the INPO class coordinator as soon as it is available.

### Chief, Technical and Regional Program Section (TRPS)

The TRPS Chief is responsible for staffing and providing oversight for the OEDO INPO Coordinator position.

### OEDO INPO Coordinator

The OEDO INPO Coordinator is a TRPS staff member responsible for monitoring staff activities involving INPO and ensuring that all activities are conducted in accordance with the MOA. The OEDO INPO Coordinator serves as the point of contact for INPO for all questions and disputes arising from staff activities. The OEDO INPO Coordinator schedules and coordinates the activities associated with the INPO SNPM course and the NRC - INPO Senior Management Meeting.

## **5. REFERENCES**

Memorandum of Agreement Between the Institute of Nuclear Power Operations and the U.S. Nuclear Regulatory Commission (ML060060035).

Affidavit of the Institute of Nuclear Power Operations Pursuant to 10 CFR 2.390 (ML060060037).

Inspection Procedure 71111, "Reactor Safety - Initiating Events, Mitigating Systems, Barrier Integrity."

## **6. APPENDICES**

None.

## **7. EFFECTIVE DATE**

July 24, 2006