

Public Meeting on Backfitting Led by CRGR  
September 13, 2016

A large, semi-transparent blue-tinted image of a nuclear power plant with several cooling towers emitting steam, serving as a background for the main text.

# Regulatory Challenges During Inspections

## Not a “volume” problem

- **Several high profile backfits compliance capture attention**
- **5 from 2011 to 2015....**
- **Inspections contain numerous backfits**
  - some get to TIA space and ruled backfits
    - DC Cook 2005 (UV/DV design)
    - Palisades 2008 (Fast Transfer Scheme)
    - Fermi – 2008 (UV/DV design)
    - Hatch 2011 (UV/DV design)
  - Perry 2016 (UV/DV design)??
- **Most do not, and here lies the problem**

# Words are Powerful

- **Inspectors seldom say backfit**
- **Backfit is common point of discussion behind the scenes of senior plant management**
- **Attempts at claiming backfit before inspection Exit mtgs often met with dismissiveness**
  - Unsure what happens behind scenes at NRC
  - Informal claims feel threatening both ways
- **Alienating the Inspector are real concerns**
  - Informal use of “NRR Concur”

# Issues That Changed Operations, Design, Procedures

- **Operation that could Potential Drain Reactor Vessel (OPDRV)**
- **RIS + EGM for Tornados (initially)**
- **Flooding 50.54(f)**
- **Recent NFPA-805 and Incipient Fire Det**
- **Perry GDC-17 and UV/DV Circuitry**
- **Perry Unit 1 Start Up Transformer and GDC-17**

# Going Forward Considerations

- **Most plants are 40+ years in operation**
  - Numerous design-related inspections
  - Many went through some type of design basis reconstitution project
  - License Renewal process
- **Do we have “reasonable assurance” that our plant designs are adequate?**
- **Would it be better served to focus plant safety inspections on maintenance of design basis and improving safety?**
- **If indications of a weakness in a design attribute surface, would this be a better use of design inspection resources?**

## Going Forward

- **CRGR should not be involved with every design related inspection finding.**
- **NRC inspectors applying today's desires for detail and documentation on engineering judgement of 1970's vintage documentation.**
  - Address in training and expectations
- **Focus should be on looking toward safe future operation.**
- **There should be an easy, rapid process to adjudicate backfit claims from inspections that are below the level of what we now call backfits.**

