

DSI-11

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STRATEGIC ASSESSMENT ISSUE PAPER RESPONSE

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STAKEHOLDER INPUT FOR DSI 11: OPERATING REACTOR PROGRAM OVERSIGHT

Background: Direction Setting Issue 11, Operating Reactor Program Oversight, discusses strategies for the Operating Reactor Program which include the functional areas of reactor licensing, inspection and performance assessment. The NRC programs that were created in order to meet these three functional areas were the NRC Inspection Program, the SALP process, and the Integrated Performance Assessment Process (IPAP). The Office of Nuclear Reactor Regulation, along with the four Regions, have historically controlled and implemented these programs.

Recently, the Millstone Lessons Learned Task Force found that problems have existed within these areas of the operating reactor program. Some of these problems were management-related in that, for some worrisome plants, conscious decisions were made to not conduct independent assessments of licensee performance or perform diagnostic evaluations. Closely related to this issue is the notion that management has failed in the past to adequately use all of the available NRC resource tools to understand what performance problems and issues exist at these worrisome licensees. The Millstone Lessons Learned Task Force also found that of the tools that were available to NRC management, AEOD's now defunct Diagnostic Evaluation Program (DEP) had been most effective in identifying design-related and operational performance problems. Design-related or generic issues uncovered or found by DETs have been consistently raised to NRC management through the formal DET staff action item process, which does not exist for other NRC activities. No other performance assessment "tool" or activity conducted by NRC has been more effective than the DE Program in assessing licensee performance when information is scant and licensee performance "cyclic." Further, DE findings and generic issues get the visibility and attention needed to address the issues and findings in a more effective followup manner than from the routine inspection program.

Concern: In 1996 and after conducting over 12 DEs at various reactor sites, the DEP, as described in Management Directive 8.7, was eliminated and its independent function deleted as an available tool to use by NRC management to assess licensee performance. Although other assessment team evaluations have been conducted, all have tried to copy or borrow from the DET format. For the few evaluation efforts which did achieve independence and success, those teams were staffed with ex-DEP personnel and were provided guidance and training.

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Recently, increased emphasis has been placed on the Integrated Performance Assessment Process (IPAP) and SALP processes to fill the gap where the DEP has been so successful in the past. However, the IPAPs that have been performed have not been that successful in raising or identifying issues. The reasons for this may be obvious because of less preparation time, less time in the field, lack of independence, and use of routine inspection personnel that have not necessarily been trained in conducting large, comprehensive-type evaluations that encourage a questioning attitude among DET members and focus on root cause, corrective actions, management and organization, and engineering and design-related issues. Similarly, the SALP process also suffers to some extent from this problem, primarily due to its dependence on the routine core inspection program, the lack of independence and a "fresh look" by other eyes that have not been routinely associated with the plant. Another potential inherent SALP weakness is the subjective nature of the SALP process.

Recommendation: We believe that the Commission should revive the DE Program or a like program, independent of the Office of NRR and the Regions. A permanent staff would be advisable in order to retain the knowledge and lessons learned of past assessments and to provide training to future participants. Only in this manner would the Commission acquire an independent and objective view of operational performance for worrisome licensees. Also, sensitive internal agency issues uncovered by DEs would get the necessary feedback through mechanisms such as from the EDO-issued DET staff actions which, if embraced by management, could provide the means for fine tuning and improving the regulation and oversight of operating reactors.

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Attachments: 1) DSI 11, Operating Reactor Program Oversight (w/o att)
2) August 31, 1994 Nuclear Power Plant Safety Culture: Evaluation
Methods and observation From USNRC Diagnostic Evaluation Teams (w/o att)