

Enclosure 2

Reactor Oversight Process Presentation Material
March 1, 2018

Document Date: 12 March 2018



Upcoming Changes to Baseline Inspection Procedures to Address Aging Management Program Effectiveness

William Holston
NRR DMLR

March 2018

Background

Long-lived: structures and components (SCs) that are not periodically placed.

Passive: SCs that perform their intended function without moving parts or a change in state.

Aging management programs (AMPs): programs developed by licensees during the license renewal application process.

Inspection Procedures

IMC 2515, Light Water Reactor Inspection Program – Operation Phase,” Appendix D Plant Status

- Change incorporates guidance on observing for indications of degradation of passive components during tours.

IP 71111.12, Maintenance Effectiveness

- One or two of the eight to ten maintenance effectiveness performance issues will be associated with AMP effectiveness.

IP 71152, Problem Identification and Resolution

- One of the five to nine samples in the annual followup of selected issues will be associated with inspection results that did not meet acceptance criteria.

Inspection Procedures, cont.

IP 71111.21M and IP 71111.21N Design Bases Assurance Inspection (Teams and Programs, respectively)

- One of the one to three operating experience examples will be related to AMP effectiveness.

IP 71003, Post-Approval Site Inspection for License Renewal

- Phase IV inspections, determining whether a licensee is conducting adequate AMP effectiveness reviews, will be conducted in the 5 - 10 year period upon entering the period of extended operation.

IMC 2516 Policy and Guidance for the License Renewal Inspection Program

- Guidance will be added to describe how AMP effectiveness reviews will be conducted.

Implementation.

- Procedure changes are currently being developed.
- Anticipate completion of all procedure changes to occur in this fiscal year.
- As changes are developed and reviewed, the staff will provide further industry briefings.

Highlights of ROP / Fukushima Working Group Efforts

Background

A NRC working group was established on October 2, 2017 to consider how to integrate the results of regulatory actions, taken by the NRC following the Fukushima Dai-ichi accident, into the ROP (ML17164A285). Multiple NRC offices, including all Regions, are represented. The goal is to begin implementation of any new ROP program documents by January 1, 2020. The first milestone (March 31, 2018) is to develop final proposals (e.g. NRC management approval on proposal for inspection requirements, level of effort, resource estimates, etc.)

Highlights of Effort to Date

- The working group has completed review of FLEX and is tentatively recommending incorporation into the ROP as follows:
 - Revise guidance in existing IPs to reiterate flexibility in sample selection of FLEX when utilized in risk-significant conditions. (IP 71111.01, “Adverse Weather Protection,” IP 71111.13, “Maintenance Risk Assessments and Emergent Work Control,” IP 71111.15, “Operability Determinations and Functionality Assessments,” and IP 71111.20, “Refueling and Other Outage Activities”)
 - Expand scope requirements in existing IP to allow for flexibility in sample selection of FLEX when utilized in risk-significant conditions. (IP 71111.22, “Surveillance Testing”)
 - Development of a new beyond design basis IP to be performed on a triennial (or longer) basis. Overall direct inspection effort would be around 8-16 hours. IP would inspect defense in depth aspects of FLEX. Will need to coordinate with Engineering Working Group to ensure coordination of regional based inspection resources.

Next Near-Term Efforts

- Continue working group efforts to consider aspects of hardened containment vents, SAMGs, multi-source dose assessment, and focused evaluations & integrated assessments that may warrant oversight and potential IP revisions.
- Continue to engage external stakeholders and NRC management to solicit feedback.

Radiation Protection Cornerstones Discussion Points

Reactor Oversight Process Monthly Public Meeting

March 1, 2018

ADAMS Accession No. ML18059B183

1. Inspection Procedure Updates (notable changes)

- a. Removed individual PI&R samples for all IPs
 - i. Generate consistency with other baseline procedure areas
- b. PI&R remains 10-15% of inspection effort
- c. 71124.01 – Radiological Hazard Assessment and Exposure Controls
 - i. Piloting new IP format by including programmatic information (e.g. samples, resource estimate etc.) on the first page
 - ii. Moved 4 hours from ALARA attachment
- d. 71124.02 – Occupational ALARA Planning and Controls
 - i. Reduced avg biennial hours from 54 to 46 (+/- 14 hours depending on collective dose quartile performance)
- e. 71124.06 – Radioactive Gaseous and Liquid Effluent Treatment
 - i. Added inspection requirement—in response to an ROP feedback form—directing inspectors to review radiation monitor threshold calculations for recently modified systems that are used as inputs to emergency action level (EAL) determinations.

2. Significance Determination Process Appendix C and D Update

- a. Currently resolving preliminary staff comments
- b. 30-day preliminary regional office review (March/April 2018)
- c. Public comment period (April/May 2018)
 - i. Will be announced during ROP Monthly
- d. Commission approval (fall 2018/winter 2019)

3. Reinstatement of Health Physics Position Program (HPPOS) via IMC

- a. Goal of completing this effort during the summer of 2018
- b. Legacy HPPOS are currently available on the public website (<https://www.nrc.gov/about-nrc/radiation/protects-you/hppos/hppos.html>)
- c. Cataloging of staff positions for knowledge management purposes

4. Regulatory Guide Update

- a. RG 8.7, Rev 4, “Instructions for Recording and Reporting Occupational Radiation Exposure Data”
 - i. Public comments being dispositioned with goal to get document into formal internal review in mid-March 2018
- b. RG 1.8, Rev 4, “Qualification and Training of Personnel for Nuclear Power Plants”
 - i. Radiation Protection Manager qualification section is of interest to RP community
 - ii. Currently accepting public comments via www.regulations.gov (search for RG 1.8 or NRC-2018-0023-0001)