

INSPECTION PROCEDURE COMMENT FORM

Inspection Procedure No.: 71151 Attachment No.: _____

Title: Performance Indicator Verification

Inspection Report No: _____ Inspection Type: Resident/DRS/Team

Plant Name: Salem Region: 1 Date(s): 7/19/99 - 7/23/99
8/2/99 - 8/6/99

Address the following statements using the following rating scale: 1= Disagree, 2= Moderately Disagree, 3= Neutral, 4= Moderately Agree, 5=Agree. Please identify errors and inconsistencies in the procedure and provide comments and suggestions for improving the procedure.

- 1. The level of effort required for the inspection was consistent with that in the IP. If not, what is the appropriate level of effort and basis for IP revision? Disagree 1 2 3 4 5 Agree

See attachment.

- 2. The procedure met the inspection objectives. If applicable, describe how the procedure (or how it was implemented) failed to meet the inspection objectives. Disagree 1 2 3 4 5 Agree

See attachment.

- 3. The inspection requirements were appropriate based on risk. What inspection requirements should be added, deleted or revised based on risk? Based on implementing the Significance Determination Process for inspection findings, how should the inspection requirements be revised to better identify risk significant findings? Disagree 1 2 3 4 5 Agree

- 4. The inspection procedure was clear and easy to use. If not, how should the inspection guidance be revised to better clarify the inspection requirements? Disagree 1 2 3 4 5 Agree

See attachment.

- 5. The IP does not result in an unreasonable impact on licensees. How should the IP be revised to preclude unreasonable licensee impact? Disagree 1 2 3 4 5 Agree

R. Hanner 8/27/99
 Inspector or Date
 Inspection Area Lead

Figure 4.2 - Inspection Procedure Comment Form

INSPECTION PROCEDURE 71151 COMMENTS

1. The manpower estimate of 80 man-hours per year to verify all performance indicators per site is not realistic. These verifications are performed by numerous resident and regional based inspectors. Each inspector will need to spend time becoming acquainted with the data collection process and personnel responsibilities in order to access the data needed to verify each PI. This is especially more time consuming in the initial verification effort, although even in the most efficient situation, 80 man hours to verify 16 PI's could only be accomplished with an extremely small sample and no follow up investigation when a questionable data point is uncovered.
2. Sections 02.04b and c provide guidance on how an inspector handles discrepancies found through an inspection of a sample of data. If an inspector uncovers a PI discrepancy in a small sample of data, then an increased sample should be inspected. It is unacceptable for a problem to be uncovered, even if its categorized as minor, in a small sample without further inspection.
- 4a. Section 02.02 states that "performance indicators..... will be verified annually by the resident inspectors." This should be revised to state that either resident inspectors or regional based inspectors will verify performance indicators.
- 4b. Section 02.02, paragraph d. states that "as necessary, observe the plant activity that generates the PI data...." The procedure should be specific with regards to what activities the inspector is expected to observe.