

## Inspection Procedure Assessment Summary and Outline of Proposed Changes

Only assessment of RRPS data conducted since IP 71111.17T assessment conducted as part of initiative to improve the effectiveness and efficiency of engineering inspections (ML17172A620).

Inspection Procedure (IP): IP 71111.17T, "Evaluations of Changes, Tests and Experiments"  
Inspector Procedure Lead: Aron Lewin  
Estimated Hours to Complete Review: 8  
Date Review Completed: 10/1/19

### 1. Results and assessment of review based on RRPS data (table below reflects IP28 report of RRPS)

Adverse trends or outliers noted: Yes. Reduced findings / efficiency in 2017 due to recent IP revision in effect. No significant adverse trends identified in prior years. Overall, findings seems to represent a small fraction of total conducted samples.

In December 2016, the IP was revised to relocate inspection of permanent plant modifications to IP 71111.21M, "Component Design Bases Inspection (Teams)." The IP objectives that remained were solely to verify that evaluations were performed in accordance with 10 CFR 50.59. In addition, inspection resources were halved (i.e. one week vice two-week inspection effort). The overall number of findings, samples conducted, and hours charged have dropped significantly in 2017. The efficiency of the IP has been reduced as well (as measured by NRC PIM Findings / per 1000 Hours Charged & NRC PIM Findings / Samples Conducted). Region II appears to be least impacted by the revision.

Fewer samples were conducted in 2014. This seems to be reflected in the drop in number of findings in that year as well. Prior to 2017, findings and IP efficiency were relatively steady. Region I appears to have slightly lower findings / IP efficiency.

Prior to 2017, hours charged was slightly increasing, however, the hours charged is reflective of the samples conducted. The NRC Hours Charged / Samples Conducted is steady prior to 2017 and reflects IP resource estimates. Fewer hours were charged in 2017 as a result of the IP revision. The hours charged in 2017 reflect the revised IP resource estimates.

No greater than green findings or greater than Severity Level IV violations were identified.

	2013	2014	2015	2016	2017
NRC PIM Findings	22	11	29	26	6
NRC Hours Charged	4879	3927	4362	4559	2022
NRC Samples Conducted	797	658	680	780	461
RI PIM Findings / Per 1000 Hours Charged	0.7	1.9	3.8	1.3	0.0
RII PIM Findings / Per 1000 Hours Charged	2.8	2.5	6.9	6.0	7.2
RIII PIM Findings / Per 1000 Hours Charged	8.9	6.3	10.6	8.2	1.7
RIV PIM Findings / Per 1000 Hours Charged	11.7	0.0	3.8	10.9	2.5
NRC PIM Findings / Per 1000 Hours Charged	4.5	2.8	6.6	5.7	3.0
RI PIM Findings / Samples Conducted	0.3%	1.0%	2.1%	0.7%	0.0%
RII PIM Findings / Samples Conducted	2.6%	1.8%	6.3%	4.7%	4.2%
RIII PIM Findings / Samples Conducted	5.8%	5.4%	5.7%	4.6%	0.8%
RIV PIM Findings / Samples Conducted	4.9%	0.0%	1.9%	4.9%	0.9%
NRC PIM Findings / Samples Conducted	2.8%	1.7%	4.3%	3.3%	1.3%
RI Hours Charged / Samples Conducted	4.8	5.3	5.5	5.5	3.4
RII Hours Charged / Samples Conducted	9.5	7.3	9.2	8.0	5.9
RIII Hours Charged / Samples Conducted	6.5	8.6	5.4	5.6	4.8
RIV Hours Charged / Samples Conducted	4.1	3.8	5.1	4.5	3.7
NRC Hours Charged / Samples Conducted	6.1	6.0	6.4	5.8	4.4

## 2. Results of discussions with regions

Call held with regional representatives on 9/27/2018. Dariusz Szwarc (region III), Bob Daley (region III), and Tom Farnholtz (region IV) dialed in. Regional representatives indicated that the drop in the number of findings in 2017 is attributed to the reduction in time allotted for the inspection effort (i.e. difficult to conduct an effective inspection in one week). The regional representatives recommended that when developing new inspection procedures as part of the engineering working group's effort, sufficient resources be allotted for oversight of 10 CFR 50.59 screening & evaluations, as well as plant modifications.

### Recommendations

The engineering working group is aware of the inefficiencies introduced as a result of the December 2016 IP revision. The working group is developing recommendations for the Commission in late 2018. IP revisions will occur after. Potential recommendations include eliminating the IP 71111.17T procedure and relocating all inspection objectives into a new engineering procedure that looks at plant modifications as well.

Inform the engineering working group to consider that sufficient resources be allotted for oversight of 10 CFR 50.59 screening & evaluations, as well as plant modifications.