

Inspection Procedure Assessment Summary and Outline of Proposed Changes

Only assessment of RRPS data conducted since IP 71111.18 assessment conducted as part of initiative to improve the effectiveness and efficiency of engineering inspections (ML17172A620).

Inspection Procedure (IP): IP 71111.18, "Plant Modifications"

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

Adverse trends or outliers noted: No adverse trends or outliers noted.

Number of findings, samples conducted, and hours charged have been steady. Overall, findings seems to represent a small fraction of total conducted samples. NRC Hours Charged / Samples Conducted reflects 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	12	9	16	8	7
NRC Hours Charged	2128	2487	2556	2421	2187
NRC Samples Conducted	276	268	291	265	265
RI PIM Findings / Per 1000 Hours Charged	3.2	6.1	4.6	4.6	0.0
RII PIM Findings / Per 1000 Hours Charged	4.6	1.2	5.3	0.0	5.7
RIII PIM Findings / Per 1000 Hours Charged	10.4	6.4	13.1	5.1	3.7
RIV PIM Findings / Per 1000 Hours Charged	3.7	0.0	0.0	1.8	3.9
NRC PIM Findings / Per 1000 Hours Charged	5.6	3.6	6.3	3.3	3.2
RI PIM Findings / Samples Conducted	2.2%	4.5%	3.5%	3.3%	0.0%
RII PIM Findings / Samples Conducted	3.8%	1.3%	4.9%	0.0%	4.5%
RIII PIM Findings / Samples Conducted	10.0%	7.0%	13.8%	6.8%	3.3%
RIV PIM Findings / Samples Conducted	2.1%	0.0%	0.0%	2.0%	4.1%
NRC PIM Findings / Samples Conducted	4.3%	3.4%	5.5%	3.0%	2.6%
RI Hours Charged / Samples Conducted	7.0	7.4	7.6	7.3	6.8
RII Hours Charged / Samples Conducted	8.3	10.7	9.2	6.4	7.9
RIII Hours Charged / Samples Conducted	9.6	11.0	10.5	13.3	9.0
RIV Hours Charged / Samples Conducted	5.6	8.5	8.0	11.1	10.5
NRC Hours Charged / Samples Conducted	7.7	9.3	8.8	9.1	8.3

2. Results of discussions with regions

Call held with regional representatives on 10/1/2018. Eric Miller (region I), Marvin Sykes (region II), and Gerond George (region IV) dialed in. Regional representatives indicated that the samples / resources for the IP should be maintained since it affords resident inspectors the ability to conduct oversight of plant modifications as they occur.

Recommendations

The engineering working group is developing recommendations for the Commission in late 2018. IP revisions will occur after. Potential recommendations include reducing the number of samples conducted.

Inform the engineering working group to consider that IP samples / resources be maintained to allow for resident inspectors to conduct oversight of plant modifications.