

From: [Hsueh, Kevin](#)
To: [ANDERSON, Ellen](#)
Cc: [Garmon-Candelaria, David](#); [Garry, Steven](#)
Subject: RE: Performance Indicator Reporting Clarification
Date: Wednesday, April 24, 2019 3:04:55 PM

Good Afternoon Ellen,

Thank you for your question.

Revision 7 of “Regulatory Assessment Performance Indicator Guideline,” NEI 99-02 Agencywide Documents Access Management System (ADAMS) Accession Number ML13261A116, provides guidance to power reactor licensees on how to collect and report the data elements that are used to compute Performance Indicators (PI). In Section I, “Introduction,” of NEI 99-02, Rev 7 on page 5, lines 25-27 it states that “the criterion for reporting is based on the time the failure or deficiency is identified, with the exception of the Safety System Functional Failure indicator, which is based on the report date of the LER.” Therefore, events that are deemed to meet the reportability criteria for a given PI are to be reported during the reporting period that corresponds to their date of identification. To answer your specific question, as stated in your email, the licensee should report this event as a “2019 PI event when the plant configuration and potential worker accessibility [was] identified.”

If you need further assistance on this topic, please contact our ROP staff lead, David Garmon, at 301-415-3512.

Kevin Hsueh, Chief
Radiation Protection and Consequence Branch
NRC/NRR/DRA

From: ANDERSON, Ellen <exa@nei.org>
Sent: Thursday, March 21, 2019 9:34 AM
To: Hsueh, Kevin <Kevin.Hsueh@nrc.gov>
Cc: Garry, Steven <Steven.Garry@nrc.gov>; Garmon-Candelaria, David <David.Garmon-Candelaria@nrc.gov>
Subject: [External_Sender] Performance Indicator Reporting Clarification

Good morning, Kevin,

NEI is requesting that NRR provide clarification regarding the NRC requirement for reporting Performance Indicator Events (PIs). Specifically, we would like to understand what the requirement for reporting long-standing conditions (> 1 year) that are only recently identified by either NRC or licensees. In Radiation Protection, this typically occurs when an “accessible” Technical Specification High Radiation Area plant configuration is identified years after the configuration was initially established. For example:

In 2013, a scaffold was placed in the vicinity of a Technical Specification High Radiation Area, whereby a worker could inadvertently access the Technical Specification High Radiation Area;

however neither the licensee nor NRC regional inspectors judge a potential access path until 2019.

How should this PI event be reported?

Should the licensee report this event (as described above in the example) as a:

- (1) 2013 PI event since the plant configuration, providing the accessibility to workers, initially occurred in 2013; or
- (2) 2019 PI event when the plant configuration and potential worker accessibility is identified?

My review of IMC 0608 and NEI 99-02 concludes that neither document provides sufficient guidance to licensees on how to address this issue.

Upon your response to this clarification, NEI will consider a revision to NEI 99-02 to incorporate this guidance.

Thanks, Kevin. As always, I appreciate your assistance and look forward to further engagement pertaining to this issue.

Ellen Anderson

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