



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 17, 2019

MEMORANDUM TO: Thomas R. Hipschman, Chief  
Reactor Inspection Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Aron Lewin, Reactor Operations Engineer */RA/*  
Reactor Inspection Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: COMPLETION OF TEMPORARY INSTRUCTION 2515/191 AND  
ASSOCIATED CROSS-REGIONAL PANEL ACTIVITIES

Temporary Instruction (TI) 2515/191, "Inspection of the Implementation of Mitigation Strategies and Spent Fuel Pool Instrumentation Orders and Emergency Preparedness Communications/Staffing/Multi-Unit Dose Assessment Plans" (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML14273A444) was issued on October 6, 2014 in order to verify licensee implementation of: 1) Nuclear Regulatory Commission (NRC) Order EA-12-049, "Issuance of Order to Modify Licenses With Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events" (ADAMS Accession No. ML12054A735), 2) NRC Order EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation" (ADAMS Accession No. ML12054A679), and 3) communications and staffing plans needed to respond to a large-scale event as requested in the March 12, 2012 request for information letter (ADAMS Accession No. ML12053A340) and multi-unit dose assessment capabilities per COMSECY-13-0010, Schedule and Plans for Tier 2 Order on Emergency Preparedness for Japan Lessons Learned, dated March 27, 2013 (ADAMS Accession No. ML12339A262). Revision 1 to TI 2515/191 (ADAMS Accession No. ML15257A188) was issued on December 23, 2015 to incorporate lessons learned from initial TI inspections. Revision 2 to TI 2515/191 (ADAMS Accession No. ML18191B074) was issued on July 10, 2018 to extend TI 2515/191 Completion and Expiration schedule.

Inspections associated with TI 2515/191 were completed by June 2019. A summary of inspection results associated with performance of TI 2515/191 are found in ADAMS Accession No. ML19280A038. Thirteen green findings were identified and corrective actions are being or have been taken. One of the green findings was issued with an associated Notice of Violation (NOV). Additional information may be found in the NRC inspection reports associated with performance of TI 2515/191. ADAMS Accession Nos. for the inspection reports are also found in the summary of inspection results document. NRC follow-up of licensee corrective actions

CONTACT: Aron Lewin, NRR/DIRS  
301-415-225

may be performed during performance of the Reactor Oversight Process (ROP) Baseline Inspection Program. An inspection to follow-up on licensee corrective actions associated with the NOV is currently planned to take place in first quarter 2020.

It should be noted that a working group was established on October 12, 2017 (ADAMS Accession No. ML17164A285) and was tasked with updating the ROP to take into account regulatory actions taken by the NRC following the Fukushima Dai-Ichi accident. The working group completed its activities on February 8, 2019 (ADAMS Accession No. ML18352A888). As discussed in the completion memorandum, numerous revisions to the ROP were made to address regulatory actions taken following the Fukushima Dai-Ichi accident. As such, there are no additional recommendations associated with performance of TI 2515/191.

The objectives of TI 2515/191 have been accomplished. In accordance with Inspection Manual Chapter 0040, "Preparing, Revising, and Issuing Documents for the NRC Inspection Manual," TI 2515/191 will be deleted in conjunction with issuance of this memorandum.

Finally, during performance of TI 2515/191, a cross-regional panel was also established via a charter (ADAMS Accession No. ML15093A339). As stated in the charter, the purpose of the cross-regional panel was: 1) to promote consistent application and resolution of inspection issues and findings by providing a forum for regional and headquarters staff to review, discuss and obtain final consensus of the disposition of the issues and findings associated with TI 2515/191, and 2) to help achieve regulatory consistency for the final disposition of issues and findings and provide a forum for the discussion of other issues of common interest upon request. A summary of cross-regional panel meetings may be found in ADAMS Accession No. ML16125A507. It should be noted that some issues discussed at the cross-regional panel meetings were identified during performance of the ROP Baseline Inspection Program vice TI 2515/191. The cross-regional panel meeting summary document notes if an issue was identified during performance of the ROP Baseline Inspection Program. In conjunction with deleting TI 2515/191, the cross-regional panel associated with performance of TI 2515/191 is being disbanded. Potential future issues identified during performance of the ROP may be dispositioned using routine processes such as those discussed in IMC 0612, "Issue Screening." It should also be noted that IMC 0612, Appendix E, "Examples of Minor Issues," is in the process of being revised to add additional examples related to the implementation of mitigation strategies.

SUBJECT: COMPLETION OF TEMPORARY INSTRUCTION 2515/191 AND ASSOCIATED  
CROSS-REGIONAL PANEL ACTIVITIES

**ADAMS Accession No.: ML19280A031**

<b>OFFICE</b>	NRR/DIRS/IRIB	BC:NRR/DIRS/IRIB	NRR/DIRS/IRIB
<b>NAME</b>	ALewin	THipschman	ALewin
<b>DATE</b>	10/10/19	10/16/19	10/17/19

**OFFICIAL RECORD COPY**