

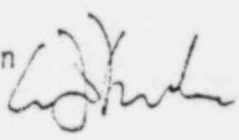
UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 13, 1980

INFORMATION REPORT

SECY-80-242

For: The Commissioners

From: Harold R. Denton, Director
Office of Nuclear Reactor Regulation 

Thru: Executive Director for Operations

Subject: INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

Purpose: This paper responds to the request for information from Commissioner Kennedy dated February 13, 1980.

Issue: The relationship of the proposed On-Site (Independent) Safety Engineering Group to other organizational entities (Plant Operations Review Committee, INPO) and the desirability of an on-site rather than an off-site group.

Discussion: Commission discussions on the TMI Action Plan some weeks ago included consideration of the specific functions which should be assigned to the proposed On-Site (Independent) Safety Engineering Group (Item I.B.1.2). Two specific areas of concern were subsequently addressed by Commissioner Kennedy in his February 13, 1980 memorandum to W. J. Dircks. These were:

1. The relationship of the functions proposed for the On-Site (Independent) Safety Engineering Group and the functions of other organizational entities such as the on-site line management for operations, the Plant Operations Review Committee, the off-site utility technical support organization, and recently established industry-wide groups (i.e., INPO and NSAC); and
2. The desirability or necessity for assignment of specific functions to an on-site group rather than to an off-site group, with particular emphasis on the appropriateness of tailoring our approach to account for differences in the organizational structure and needs of individual utilities.

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The enclosed Table 1 provides a listing of the principal functions now assigned to the plant staff review group (the PORC) and to the utility's independent review and audit group in accordance with current staff guidelines (Standard Review Plan, Regulatory Guide 1.53, Standard Technical Specifications). In the following discussion, we elaborate the role and characteristics we envision for the new Independent Safety Engineering Group (ISEG). As reflected in the Action Plan, these are our tentative, or working, criteria that are being revised and refined with experience in their application to new OLS prior to their general application to all licensees.

We do not envision that the new Independent Safety Engineering Group would replace either existing review group. Rather, it would be an additional independent group of five dedicated, full-time engineers, located on-site, but reporting off-site to a high level corporate official who is not in the management chain for power production. The Independent Safety Engineering Group will increase the available technical expertise located on-site and will allow for continuing, systematic and independent assessment of plant activities. Integration of the Shift Technical Advisors into the Independent Safety Engineering Group could enhance the group's contact with and knowledge of day-to-day plant operations and provide additional expertise.

The functions of the Independent Safety Engineering Group require daily contact with the operating personnel and continued access to plant facilities and records. The independent safety review functions can, therefore, best be carried out by a group physically located on-site. However, for utilities with multiple sites, it may be possible to perform portions of the independent safety assessment function in a centralized location for all of the utility's plants. In such cases, an on-site group still will be required, but it may be slightly smaller than would be the case if it were performing the entire independent safety assessment function. The last column of Table 1 indicates which of the audit activities must be performed on-site, which could be performed off-site, and which could be performed either on-site or off-site depending upon the utility organizational structure or geographical configuration.

The function of the ISEG is to examine plant operating characteristics, NRC issuances, Licensing Information Service advisories and other appropriate sources which may indicate areas for improving plant safety. Where useful improvements can be achieved, it is expected that this group would develop and present detailed recommendations for revised procedures, equipment modifications or other means. Another principal function of the ISEG would be to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practical. This is not to suggest detailed auditing of operations by the ISEG. Rather, it is intended that through oversight and utility understanding of safety related operations, the ISEG will be in a position to advise utility management on the overall quality of operations. Thus, ISEG would not be responsible for sign-off functions such that it becomes involved in the operating organization.

The information provided by industry-wide groups, such as INPO and NSAC, will be valuable in identifying generic areas of concern. Information developed by these groups will be made available to the industry. However, determination of the impact on each facility will remain a plant specific task that should be conducted or reviewed by the utility staff.

Therefore, in our view, the existence of industry-wide groups does not alleviate the need for the ISEG or the other utility review groups.



Harold R. Denton, Director *5/6/80*
Office of Nuclear Reactor Regulation

Enclosures:

- Table 1: Review Responsibilities
- Table 2: Review Functions

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Table 1

Responsibility	Current		Proposed
	Plant Staff Review Group (PORC)	Independent Review and Audit Group	Independent Safety Engineering Group
Review procedures and changes to procedures	X		On-Site
Review proposed tests and experiments	X		On-Site
Review changes and modifications to Unit systems and equipment	X		On-Site
Review Safety Evaluations for changes to procedures, equipment, or systems, or tests and experiments to verify that actions do not constitute unreviewed safety issues		X	On-Site
Review changes, tests, or experiments which involve unreviewed safety issues		X	On-Site
Review changes to technical specifications	X	X	On-Site
Review violations of technical specifications, including reports and recommendations to avoid recurrence	X		On-Site
Review violations of codes, regulations, orders, technical specifications, license requirements, and of internal procedures or instructions		X	On-Site
Review events requiring 24 hours reporting to NRC	X	X	On-Site
Review unit operations to detect potential safety hazards	X		On-Site

Table 1 (contd:)

Responsibility	Current		Proposed
	Plant Staff Review Group (POR)	Independent Review and Audit Group	Independent Safety Engineering Group
Review significant operating abnormalities, or deviations from normal or expected performance of plant equipment		X	On-Site
Review unanticipated deficiencies in some aspect of design or operation		X	Either
Review Security Plan and implementing procedures and recommend changes	X		Either
Review Emergency Plan and implementing procedures and recommend changes	X		Either
Review reports and meeting minutes of other review groups and provide oversight		X	Off-Site
Assure corrective action and recommendations of other review groups are implemented		X	Off-site
Other reviews as requested by the Offsite Review Group	X		On-Site
Assess Plant Staff Performance			On-Site
Evaluate effectiveness of QA Program			Either
Evaluate operating experience of the unit and units of similar design			On-Site
Other reviews deemed necessary by an independent reviewer		X	Either

Table 2

Review Functions of the Independent Engineering Review Group

- . Evaluation for technical adequacy and clarity of all procedures important to the safe operation of the facility.
- . Evaluation of plant operations from a safety perspective.
- . Evaluation of the effectiveness of the quality assurance program.
- . Evaluation of the operating experience of the plant and plants of similar design.
- . Overall assessment of the plant staff performance regarding their conformance to requirements related to safety.
- . Assessment of plant safety programs.
- . Any other matter involving safe operation of the nuclear power plant that an independent review deems appropriate for consideration.