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MINUTES OF MEETING BETWEEN REPRESENTATIVES OF INPO AND THE NRC STAFF NOVEMBER 19, 1980, ROOM 013, NICHOLSON LANE BLDG.

ATTENDEES:

- R. G. Smith, SD
- G. A. Arlotto, SD
- A. L. Eiss, SD
- S. D. Richardson, SD
- C. Michelson, AEOD
- H. Thompson, NRR
- T. Dorian, ELD
- E. P. Wilkinson, INPO
- R. Pack, INPO
- E. L. Thomas, INPO

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PURPOSE: The purpose of this meeting was to exchange information on the respective roles of the NRC Office of Standards Development and the Institute of Nuclear Power Operations (INPO) and to determine if an interface should be established for further efforts between those two organizations. The agenda for the meeting is attached as Enclosure 1.

SUMMARY: G. Arlotto of SD described the organization and objectives of SD, as well as the process by which SD regulations and regulatory guides are developed. E. Wilkinson described actions taken to date by INPO including inspection of some utility plants and development of draft criteria to be used for those inspections particularly in the areas of personnel training and plant operations. Other issues discussed included the proprietary nature of some INPO material, possible NRC review of draft INPO material and the differences between use of INPO material in regulations or regulatory guides as opposed to incorporation into NUREG reports or NRR letters to licensees. Points identified for further discussion included a clarification of what INPO intends to be the appropriate use of their materials by the NRC and, secondly, does this intended use call for an interface between SD and INPO. A target date of not later than two months was established for another meeting to discuss these issues.

DISCUSSION: This section of the minutes records the significant points made during the meeting:

A. Role of the NRC Office of Standards Development

- The overall organization of the Office of Standards Development was described noting that responsibility for standards in the topical areas of qualification and operations personnel and plant operations (areas in which INPO is involved) is primarily in the Reactor Systems Standards Branch.
- The objectives of the Office of Standards Development are to identify and resolve generic issues associated with regulation of nuclear facilities and to develop and maintain a comprehensive body of standards codifying the developed solutions.
- The primary products of the Office of Standards Development are NRC regulations which could be characterized as describing general or specific requirements

CONTACT: S. D. Richardson, SD
443-5913

that must be met, and NRC regulatory guides which describe acceptable solutions to specific problems, recognizing, however, that other solutions may also be acceptable.

- The process for development of Office of Standards Development products was reviewed. Specifically, it was noted that this process included identification of need for and scope of product, approval of task by program offices, preparation of value-impact assessment, technical and management review, review by the Advisory Committee on Reactor Safeguards and public and industry input prior to publication of the final product. The methods used to obtain public input on guides or regulations were identified, including noticing availability of documents in the Federal Register, direct mailing to thousands of interested parties, and public meetings to discuss specific technical issues. It was also noted that the methods used on a particular SD product depended on its type (i.e., guide or regulation), safety significance and public interest.

B. INPO Organization and Role

- The overall organization of INPO was described including identification of the major divisions within INPO as the Analysis and Special Projects Division, the Evaluation and Assistance Division, the Training and Education Division, the Radiological Protection and Emergency Preparedness Division, the Communications Division and the Administrative Division.
- The main tasks of INPO were identified as (1) to set standards for selection, education, training of nuclear power plant personnel; (2) to set standards to ensure the safe operation of nuclear power plants; (3) to review all incidents, to identify those that are significant and to ensure proper analysis of incidents; (4) to enhance emergency preparedness; (5) to review control room design, particularly from the human factors standpoint.
- In the area of personnel training, INPO was currently evaluating utility training programs in order that the best aspects of each program could be incorporated into a model training program that could be used as the basis for a system of accreditation of utility training programs and certification of program instructors.
- In the area of plant operations, INPO was developing criteria to which plants would be inspected. A number of INPO plant inspections are either complete or will be complete by January 1981 and a number of deficiencies have been brought to utility corporate management for resolution.
- In the area of emergency preparedness, INPO has established a 24-hour incident response capability that can provide assistance to utilities if incidents do occur.

C. Use of INPO Materials in the Regulatory Process

- The NRC staff pointed out that INPO material possibly could be used after independent review as a foundation for regulatory products, probably regulatory guides, in areas where there is an urgent need for these products such as in the area of qualification of plant personnel. This could not only increase

the stature of the INPO material but could also improve the INPO material as a result of the broad review and input, particularly public comment, that is provided for regulatory products.

- INPO stated that it had not been decided how the NRC should use the INPO material or even if the NRC should use the material at all. The NRC staff pointed out that one possible use of the INPO material may be as input to the national standards program whereby the consensus process of the national standards program would provide for a broad review of the INPO material.

CONCLUSION: INPO needs to decide how and when the documents developed by INPO are intended to be used in the regulation process for commercial nuclear power plants. The response to this issue will determine if an interface arrangement should be established between the NRC Office of Standards Development and INPO. A target date of not later than two months was established for another meeting to discuss these issues.

S. D. Richardson

S. D. Richardson
Reactor Systems Standards Branch
Division of Engineering Standards
Office of Standards Development

Encl: Agenda for 11-19-80 meeting between
Representatives of INPO and the NRC
Staff

cc: Meeting attendees
NRC Public Document Room

Agenda

U. S. Nuclear Regulatory Commission, Office of Standards Development
Meeting With
Institute of Nuclear Power Operations (INPO)

Wednesday, November 19, 1980

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- I. Role of Office of Standards Development
 - A. Organization
 - B. Objectives
 - C. Products
 - D. Input
 - E. Process
 - F. National Standards Program
- II. INPC Organization and Role
- III. Areas to Explore
 - A. Use of SD Process for INPO Documents
 - 1. INPO's view of disposition of its documents
 - a. Use in regulatory process
 - b. Private communication with utilities
 - c. INPO enforcement only
 - 2. Authority of INPO re its documents
 - a. Proprietary nature
 - b. Clearance before release
 - 3. NRC involvement
 - a. Role in development
 - b. NRC review
 - c. Endorsement with exceptions
 - Possible release - NRC review in parallel
 - d. Use of document similar to national standard
 - B. National Standards Interface - Advantages and Disadvantages
 - 1. Consensus difficult and time consuming
 - 2. Lowest common denominator probable
 - 3. Stature of document high
 - C. INPO as Certifying Organization
 - Minimum requirement - complete body of standards