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United States Senate
WASHINGTON, D.C. 20510

May 8, 1990

Office of Congressional Liaison
Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

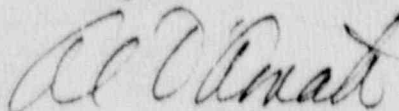
Dear Director:

Because of the desire of this office to be responsive to all inquiries and communications, your consideration of the attached is requested.

Your findings and views, in duplicate form, will be appreciated.

Please reply to my Syracuse office.

Sincerely,



Alfonse M. D'Amato
United States Senator

AMD/mt

Attachment

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Retire Nine Mile One

A broad based coalition of citizens concerned about the safety of the Nine Mile One Nuclear Facility

Steering Committee

- Chris Binaxas
- Linda Clark
- Ollie Clubb
- Helen Daly, PhD.
- Clifford Feldman
- Cindy Gagne
- Chris Lynch
- Norman Roth
- Virginia Durkin-Stamm
- Edward Swift, MD.
- Tom Walsh

April 30, 1990

Dear Senator D'Amato:

The coalition Retire Nine Mile One has concerns about the role played by The Institute of Nuclear Power Operations in the regulation of nuclear power plants. The institute, known as INPO, was created in the aftermath of the Three Mile Island accident by the nuclear industry to inspect plants and review corporate operations. INPO is a membership organization funded by the utilities. Niagara Mohawk is a member and evaluations have been made of their nuclear operations.

The NRC has transferred some of the monitoring of nuclear power plants, including safety evaluations, to INPO and has acknowledged that they do not wish to duplicate the efforts of INPO. However, INPO is not required to share their findings with the NRC and release of INPO reports to the public is prohibited. An INPO memorandum defends the groups secrecy, stating that "public and/or political pressure may be brought to bear on the NRC to follow-up on INPO evaluations for the purpose of regulatory action."

When the INPO reports on the Seabrook Nuclear Power Plant were recently obtained by citizens groups, they revealed a litany of problems never before documented and not addressed in the NRC's licensing process for Seabrook. Many of the problems affected crucial safety systems which the company admitted it would not address until after full power operation had begun. Recent testimony before Congress on this matter by Ralph Nader and Robert Pollard is enclosed.

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The INPO/Seabrook situation has direct implications for people concerned about the safety of Nine Mile One. For many years, INPO has produced reports about Nine Mile One. How can we be certain the NRC has a complete picture of the condition of Nine Mile One? How can we know that all the problems discovered at Nine Mile One have been addressed if we do not know what the INPO reports on Nine Mile One contain?

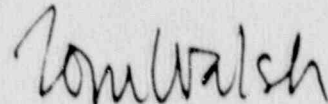
While we recognize the right of organizations to conduct confidential internal evaluations, when INPO conducts an evaluation they are operating in lieu of the NRC. INPO reports should be available to the public as would the reports of the NRC. The current process endorses secrecy and eliminates public accountability.

We ask that you request the NRC to obtain all INPO reports related to Niagara Mohawk's nuclear operations and release them to the public document room as would be required of NRC reports. We also request an accounting of the number of INPO reports produced related to Niagara Mohawk's nuclear operations. We hope you will insure that all information contained in reports relating to Nine Mile One be subject to restart action procedures currently in process by the NRC.

We hope you will share our concern that an industry group has become the industry watchdog, eliminating the public scrutiny of nuclear plants guaranteed by law.

Sincerely,

RETIRE NINE MILE ONE



by Tom Walsh, co-chair

MEMORANDUM OF AGREEMENT
BETWEEN
THE INSTITUTE OF NUCLEAR POWER OPERATIONS
AND
THE U.S. NUCLEAR REGULATORY COMMISSION

This memorandum between the U.S. Nuclear Regulatory Commission (NRC) and the Institute of Nuclear Power Operations (INPO) reflects the desire for a continuing and cooperative relationship in the exchange of experience, information, and data related to the safety of nuclear power plants.

The NRC has statutory responsibility for licensing and regulating nuclear facilities and materials and for conducting research in support of the licensing and regulatory process, as mandated by the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and the Nuclear Nonproliferation Act of 1978; and in accordance with the National Environmental Policy Act of 1969, as amended, and other applicable statutes. NRC's responsibilities include protecting public health and safety, protecting the environment, protecting and safeguarding materials and plants in the interest of national security, and assuring conformity with antitrust laws. INPO is an organization sponsored by the nuclear utility industry whose mission is to promote the highest levels of safety and reliability in the operation of nuclear electric generating plants. As such, NRC and INPO undertake mutual and complementary activities, as defined in appendices to this Agreement. These appendices will help ensure that the goals of both organizations are achieved in the most efficient and effective manner without diminishing or interfering with the responsibilities and authorities of the NRC and the goals of INPO.

This Memorandum is not intended to be an enforceable agreement or contract on either party, notwithstanding the occasional use of the term "agree" or the use of mandatory language such as "shall" or "will" in either the Memorandum or its appendices. In particular, insofar as this Memorandum or its appendices indicate that the Commission will take or refrain from taking a particular action in discharge of its regulatory responsibilities, such an indication is intended only to reflect the Commission's current policy intentions in this regard. Since this Memorandum is not legally binding, the Commission may depart from its terms whenever it deems it necessary or appropriate to do so in the discharge of its regulatory responsibilities, except that in the interests of cooperation the Commission will, if appropriate and practical, advise INPO of any intention to depart from the terms of this Memorandum prior to doing so.

It is intended that this Memorandum of Agreement and its companion appendices complement one another. Appendices are utilized to delineate detailed and specific areas for cooperative agreements which exist between the parties of this Agreement and which may be amended from time to time. The appendices are not interpreted as restrictive to only those areas specified in the document, but serve as keystones of the Agreement for the exchange of information to support the common goals of both organizations.

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Memorandum of Agreement
Between INPO/NRC
Page Two

INPO and the NRC agree to consult with each other with regard to the availability of technical information which would be useful in areas of mutual interest; and to promote and encourage a free flow of such information. In this regard, INPO will provide plant specific information on a case-by-case basis consistent with the other provisions of this Agreement. Both parties recognize the need for excluding from this Agreement fragmentary information related to work in progress and/or which has been received on a privileged basis. However, as information is verified and found to be necessary or important to findings upon which significant safety-related conclusions and recommendations are based, the party holding such information will take appropriate and timely steps to remove it from the fragmentary, privileged or otherwise restricted status. However, the NRC cannot provide information to INPO that is required by law to be withheld. Each party recognizes the need, on some occasions, to be able to accept and protect privileged information where such information could not be made available otherwise. It is recognized that the parties to this Agreement may not be fully aware of the extent of each other's knowledge and thus, this Agreement requires only the parties' best efforts and a reasonable degree of care in assuring that significant safety-related information is provided in a timely manner to the other party.

The parties to the Agreement will meet periodically to exchange information and keep each other apprised of the major activities underway and planned in each area of agreement. The meetings are an effort to avoid unnecessary and unintentional duplication of activities, while providing a means to identify those areas where independent activities by another organization may be warranted.


Coordination meetings are for information exchange only. Meetings are not to be construed as requests or opportunities for (or used by the NRC for obtaining) the advice or recommendations of INPO or its personnel on policy or regulatory issues within the scope of the NRC's responsibilities. INPO advice or recommendations to the Commission on regulatory or policy matters, if any, are to be made through established procedures of the Commission and will be considered by the Commission in the same manner as other offers of advice or recommendations made through established Commission procedures. Minutes of all coordination meetings will be placed in the NRC public document room. These need not be verbatim transcripts of coordination meetings, but should include a list of the meeting participants and agenda items discussed at meetings, with brief summaries of the discussions held by meeting participants.

In addition to meetings, it is expected frequent, informal communications will exist among the parties that will be limited to exchanging information and providing updates on the status of activities in progress or planned. The appendices to this agreement provide for NRC access to selected INPO proprietary documents and information. Such documents and information provided to the NRC will be appropriately identified as Limited or Restricted Distribution. Consistent with previous legal decisions sanctioning the exchange of proprietary information between INPO and NRC and in the interest of improving nuclear plant safety, NRC will control distribution of INPO

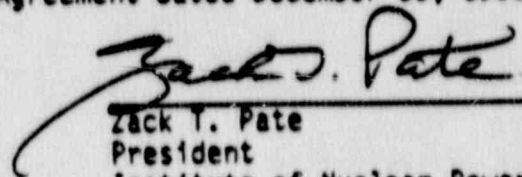
Memorandum of Agreement
Between INPO/NRC
Page Three

proprietary documents and information within the agency and will exert best efforts to protect it from unauthorized disclosure. Exceptions to this policy for control of INPO proprietary documents and information will be addressed by the parties to this agreement on a case-by-case basis.

This Agreement supersedes the previous Agreement dated December 18, 1985.



Victor Stella, Jr.
Executive Director for Operations
U.S. Nuclear Regulatory Commission



Zack T. Pate
President
Institute of Nuclear Power Operations

Effective Date: October 20, 1988

APPENDIX NUMBER ONE

COORDINATION PLAN FOR NRC/INPO EXCHANGE OF OPERATIONAL EXPERIENCE DATA

1. BACKGROUND

The purpose of this plan is to coordinate selected NRC and INPO activities related to the collection and feedback of operational experience, information and data related to the safety and reliability of nuclear power plants. There are several underlying assumptions, including the following:

- a. NRC as the government entity has statutory responsibilities and authorities which are paramount. Nothing in this plan dilutes that responsibility and authority to take action in accordance with applicable statutes.
- b. Recognizing the ability of INPO to contribute to safe and reliable operation with a resulting benefit to public health and safety, the following statements apply:
 - (1) NRC and INPO share the common objectives that reporting of operational experience information and data be efficient and that duplicative or inconsistent reporting be minimized.
 - (2) NRC and INPO agree that the validity of analysis results may depend upon the completeness and quality of input information.
 - (3) NRC and INPO agree that the effectiveness of operational data feedback is dependent upon a proper understanding of the significant lessons learned from industry operating experience.


2. OVERALL COORDINATION

- a. NRC and INPO will regularly exchange, on a timely basis, the results of completed and formally documented generic analysis and event evaluation of operational data.
- b. INPO will provide the NRC with timely listings of the significant events that have been identified by the SEE-IN screening process as significant events for analysis. Similarly, the NRC will provide INPO in a timely manner with the results of its significant event screening procedure that identifies events for engineering evaluation or a case study and for Information Notices or Bulletins.
- c. Information and data obtained by the NRC from foreign sources, that do not include restrictions on further distribution, will be entered into a computerized data bank and will be made available for INPO analysis activities. Foreign information and data obtained by INPO that does not include restrictions on further dissemination will

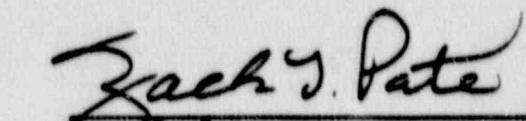
Appendix Number One
Coordination Plan for NRC/INPO
Exchange of Operational Experience Data
Page Two

similarly be entered into an INPO data base and will be made available for NRC analysis activities.

- d. INPO will provide the NRC access to and use of the Nuclear Plant Reliability Data System (NPRDS) operated and maintained by INPO. Additional agreements regarding NPRDS access and usage are contained in a contract between NRC and INPO that is separate from this agreement.
- e. NRC and INPO intend to have periodic informal technical discussions on generic or event-related studies in progress that are of mutual interest.
- f. Prior to issuing to the industry an Information Notice or other completed and formally documented analysis on a specific event at a nuclear power plant, the NRC agrees to make reasonable efforts to review available INPO SEE-IN products to determine if the Information Notice or other analysis is needed and, if so, that it is technically accurate. Similarly, INPO agrees to make reasonable efforts to review available NRC Information Notices or other completed analysis to determine if an INPO SEE-IN product is needed and, if so, that it is technically accurate. Unless a compelling safety concern dictates otherwise, the party identifying technical inaccuracies, if any, will give the other party reasonable advance notification of the inaccuracies and seek resolution before formally issuing the information to the industry.



Victor Stello, Jr.
Executive Director for Operations
U.S. Nuclear Regulatory Commission



Zack T. Pate
President
Institute of Nuclear Power Operations

Effective Date: October 20, 1988

APPENDIX NUMBER TWO
COORDINATION PLAN
FOR
NRC/INPO APPRAISAL AND EVALUATION
ACTIVITIES

1. BACKGROUND

The purpose of this plan is to coordinate selected NRC and INPO utility appraisal and evaluation activities. It is also intended to provide a mechanism and a basis for NRC to recognize INPO efforts in this area.

There are several underlying assumptions, including the following:

- o INPO recognizes NRC's regulatory responsibilities and authority.
- o NRC recognizes INPO's efforts to promote excellence in nuclear plant operations.
- o NRC desires to recognize INPO evaluation activities to the extent that these activities are effective in helping meet NRC's responsibilities as well as lessen the burden imposed on the industry by duplicative appraisal activities.
- o NRC requires access to selected INPO documents and information as well as the opportunity to observe selected INPO activities in order to be able to give credit for INPO activities and to thereby avoid unnecessary duplication.

2. INPO ACTIVITIES

This section outlines current and planned INPO evaluation activities.

- a. INPO will conduct evaluations of operating nuclear plants on a periodic basis. The interval between plant evaluations will average about 16 months.
- b. INPO will conduct evaluations or assistance visits related to corporate support of nuclear stations. This phase of INPO activities will usually be conducted coincident with (in close time proximity to) an evaluation of the utility's plants.
- c. INPO will prepare a written report for each evaluation. These reports will include appropriate utility responses in each area identified by INPO as needing improvement.

- d. Each succeeding evaluation will include follow-up on the responses developed during the preceding evaluation.
- e. INPO will conduct appropriate visits to Near Term Operating License plants and their corporate organizations to assist in their preparation for operation.

3. NRC REVIEW OF INPO ACTIVITIES

- a. INPO expects its member utilities to make operating plant evaluation reports available to the NRC for review or reading. Further, INPO will make final evaluation reports available to the NRC for review or reading by appropriate NRC management personnel at the INPO offices in Atlanta.
- b. Current copies of, and any changes to, INPO evaluation criteria will be provided to NRC.
- c. NRC may, on request, have a representative observe an INPO evaluation. INPO will obtain the necessary concurrence from the host utility. While specifying a maximum number to be observed is not considered necessary by either party, it is anticipated that an NRC representative may observe INPO evaluations several times annually. Where NRC Regional personnel participate as observers, they would not normally accompany an INPO team on an evaluation in their own Region.
- d. INPO will brief personnel of the NRC Division of Reactor Inspection and Safeguards, Office of Nuclear Reactor Regulation (NRR) periodically on all aspects of INPO's evaluation and assistance program.
- e. NRC review of INPO evaluation activities will be coordinated by the NRC Office of the Executive Director for Operations. Since INPO has its own system for obtaining member corrective action, NRC's role in pursuing correction of INPO evaluation findings will primarily involve only those potentially significant safety problems for which NRC has no other reasonable alternative in meeting its legislated responsibilities. Any other NRC follow-up enforcement action would be in accordance with paragraph 4.c. below.


4. NRC RECOGNITION OF THE INPO EVALUATION PROGRAM

- a. Subject to the continued development and success of the INPO program as outlined above and NRC's ability to effectively review the program, NRC intends to recognize INPO evaluations and, in those

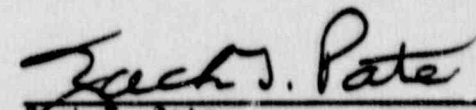
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Coordination Plan for NRC/INPO
Appraisal and Evaluation Activities
Page Three

areas deemed appropriate, to minimize NRC-sponsored evaluations or appraisals that duplicate INPO evaluations.

- b. NRC and INPO will coordinate NRC inspections (involving two or more inspectors) and INPO evaluations to minimize the impact on the utility involved. Where feasible, NRC and INPO will coordinate event related or other emergent on-site activities such as NRC augmented inspection teams (AITs), incident investigation teams (IITs), diagnostic evaluation teams (DETs) and INPO event investigations, although each party recognizes that it may not be possible to coordinate all of these efforts.
- c. The NRC will apply the established Commission enforcement policy for licensee identified non-compliances to those non-compliances identified by utilities as a result of INPO evaluations.



Victor Stello, Jr.
Executive Director for Operations
U.S. Nuclear Regulatory Commission



Jack J. Pate
President
Institute of Nuclear Power Operations

Effective Date: October 20, 1988

APPENDIX NUMBER THREE
COORDINATION PLAN
FOR
NRC/INPO TRAINING-RELATED ACTIVITIES

1. BACKGROUND

The purpose of this plan is to coordinate selected NRC and INPO activities related to nuclear power industry training. It is also intended to provide a mechanism and a basis for information sharing and NRC recognition of INPO efforts in this area.

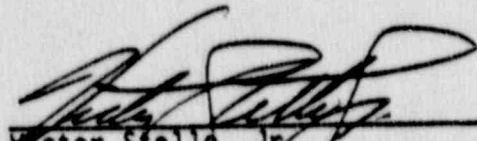
There are several underlying assumptions:

- o INPO recognizes NRC's regulatory responsibility and authority.
- o NRC and INPO share the goal of improving and maintaining the quality of nuclear utility training.
- o NRC recognizes the industry's initiative and commitment to INPO programs that promote high quality training through development of integrated training and qualification systems, including accreditation of key training programs.
- o NRC recognizes INPO accreditation and associated training evaluation activities (see also Appendix 2, "Coordination Plan for NRC/INPO Appraisal and Evaluation Activities") as an acceptable means of self-improvement in training. Such recognition encourages industry initiative and reduces duplicate program review and appraisal activities.
- o INPO recognizes that the NRC requires access to selected INPO documents and information, as well as the opportunity to observe selected INPO activities related to training and accreditation, in order to ensure that the NRC meets its obligations to the public and the Congress.
- o Coordination of NRC and INPO training-related activities and sharing of information will increase overall effectiveness as well as lessen the burden imposed on the industry by duplication of activities.

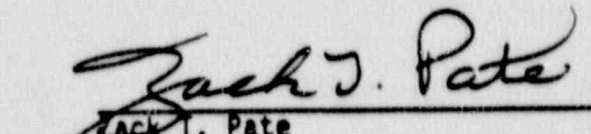
2. OVERALL COORDINATION

In order to promote overall coordination of NRC and INPO training-related activities, the following actions will be taken:

- a. NRC/INPO Coordination meetings will be held periodically with representatives from NRC's Division of Licensee Performance and Quality Evaluation (NRR) and INPO's Training and Education Group. At these meetings, information on ongoing projects and plans will be exchanged. Written reports of progress and results may be exchanged.
- b. INPO will provide the NRC with access to selected INPO documents and information, and will provide updated copies of the INPO training guidelines and Training System Development Manual. INPO will also provide the NRC, on a case-by-case basis, with access to the job and task analysis data stored in the INPO computer data base.
- c. Coordination regarding accreditation of training programs is covered by Attachment 1.



Victor Stello, Jr.
Executive Director for Operations
U.S. Nuclear Regulatory Commission



Jack I. Pate
President
Institute of Nuclear Power Operations

Effective Date: October 20, 1988

ACCREDITATION OF TRAINING PROGRAMS

1. BACKGROUND

The purpose of this plan is to provide for coordination of selected NRC and INPO activities related to the accreditation of performance-based training programs. This plan also provides for continued industry initiative with NRC monitoring in this area and serves as a basis for NRC recognition of INPO's efforts. This coordination plan is consistent with the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel. In carrying out this plan INPO recognizes NRC's responsibility and authority.

2. INPO ACTIVITIES

This section outlines current and planned INPO activities related to the accreditation of performance-based programs for the training and qualification of nuclear power plant personnel. The INPO point of coordination for the implementation of this plan is the Group Vice President, Training and Education.

- a. INPO will continue to manage the accreditation of utility training programs including:
 - o self-evaluations by member utilities, with assistance from the INPO staff;
 - o on-site reviews of training and qualification programs by teams of INPO and utility personnel;
 - o preparation of a report for each accreditation team visit;
 - o follow-up on recommendations developed during the accreditation process;
 - o awarding, deferring or placing on probation of accreditation by the National Nuclear Accrediting Board; and
 - o reviewing accreditation of utility training programs approximately every four years (accreditation will be renewed, continued in a probationary status, or withdrawn).
- b. INPO will continue to conduct periodic performance-oriented evaluations of training and qualification programs as part of its operating plant evaluations and as follow-up to accreditation.

- c. INPO will provide updated copies of the accreditation procedures and criteria document as it is revised. This document will be made publicly available.
- d. INPO will review and consider NRC recommendations regarding INPO-managed training-related programs, documents, and criteria.
- e. INPO will provide periodic detailed briefings on accreditation to appropriate NRC management personnel, including review of the activities described in 2.a above and documentation of industrywide accreditation status.
- f. INPO intends to brief the Commission periodically on program status.

3. NRC ACTIVITIES

This section outlines the NRC's continuing efforts to monitor INPO activities as part of NRC's assessment of the effectiveness of industry's training and qualification program improvements; The NRC point of coordination for implementation of this plan is the Director, Division of Licensee Performance and Quality Evaluation, HRR.


- a. NRC will not issue documents that duplicate INPO training documents and will not refer to INPO documents as a means of satisfying NRC requirements so as to avoid "codifying" or the appearance of "codifying" INPO documents.
- b. NRC will assess the effectiveness of industry's training and qualification program improvements as follows:
 - o conduct operator licensing exams;
 - o conduct operator requalification exams, consistent with Commission policy and 10 CFR Part 55;
 - o conduct reviews of a sample of utility training programs to ensure use of performance-based training principles;
 - o monitor plant and industry trends and events involving personnel errors;
 - o continue evaluation of industrywide training and qualification program effectiveness; and
 - o conduct performance-oriented training inspections to assess the level of knowledge and qualifications of plant personnel.

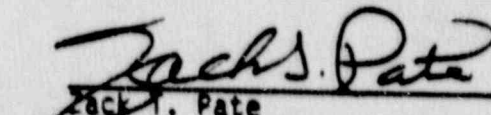
- c. NRC will monitor INPO activities in training and accreditation as follows:
 - o receive periodic briefings and/or reports from INPO and review a sample of applicable INPO documents;
 - o nominate individuals who are not on the NRC staff to serve as members of the National Nuclear Accrediting Board with full voting privileges;
 - o have an NRC staff member attend and observe selected National Nuclear Accrediting Board meetings with the INPO staff and/or the utility representatives;
 - o on request and with concurrence of the utility, have NRC employees observe INPO accreditation team site visits for the purpose of monitoring the effectiveness of the accreditation process. Since accreditation teams are relatively small in size, it is anticipated the NRC would typically send only one observer on any visit. However, in certain circumstances, it may be appropriate to send more than one. INPO will obtain the necessary concurrence from the host utility. While specifying a maximum number to be observed is not considered necessary by either party, it is anticipated that NRC employees would observe approximately 20 percent of INPO accreditation team visits; and
 - o accompany INPO on selected operating plant evaluations (see Appendix 2).
- d. NRC will continue to provide INPO copies of NRC's performance-oriented inspection program, including applicable inspection guidelines.
- e. NRC will coordinate any team inspections with INPO accreditation team visits and evaluations so as to minimize the impact on the utility involved. On request and with concurrence of the utility, an INPO employee may occasionally observe an NRC inspection in this area.
- f. Since INPO has its own system for obtaining member corrective action, NRC's role in pursuing corrective action of INPO-identified training and qualification recommendations will involve only significant safety problems for which NRC has no other reasonable alternative in meeting its legislated responsibilities. The NRC intends to exercise discretion in enforcement matters related to training as described in the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel.

APPENDIX NUMBER FOUR
COORDINATION PLAN
FOR
INPO/INDUSTRY PARTICIPATION IN
NRC INCIDENT INVESTIGATION TEAMS

1. The purpose of this plan is to establish guidance for INPO or other industry representatives involvement with NRC Incident Investigation Teams (IITs). It is also intended to minimize duplication of event investigation efforts to reduce the impact on the affected utility and to promote dissemination of accurate operating experience information to the industry.
2. NRC and INPO recognize the importance of NRC's incident investigation activities in identifying significant operational experience information. Participation by industry representatives on an IIT should result in a more complete and thorough understanding of the factors contributing to the incident and actions needed to prevent recurrence. In carrying out this plan, INPO recognizes NRC's responsibility and authority.
3. In view of these considerations, INPO and NRC agree on the following:
 - a. INPO or other industry representatives' participation on an IIT will be coordinated between the Director of the Office for Analysis and Evaluation of Operational Data (AEOD) for the NRC and the Vice President for Government Relations, INPO. A request for participation by an industry representative can be initiated by either party to this agreement.
 - b. NRC will provide INPO with a reasonable number of copies of the current Incident Investigation Manual and any other procedures which apply to the operation of an IIT.
 - c. NRC will notify INPO promptly when an IIT is being activated and provide all necessary information to enable INPO to facilitate industry participation.
 - d. INPO will serve as the central point of contact for coordination of all issues and procedures regarding industry participation on IITs.
 - e. INPO will recommend industry participants to the NRC.

- f. INPO will request each industry nominee to sign a statement regarding proprietary information, conflicts of interest, and waiver of compensation. In addition, each industry nominee will be requested to comply with the procedures established for the operation of IITs, which include procedures for handling differences in professional opinion and the release of investigation information. This signed statement will be provided to the NRC as part of the nomination process.
- g. INPO will provide assistance in coordinating with the affected utility to obtain site access for the industry representative(s).
- h. INPO will work with the affected utility and the IIT so that the Significant Event Report (SER), if any, being prepared by INPO on the event under investigation by an IIT is factually correct. To this end, INPO will request that the affected utility coordinate a review of the draft SER with the IIT and provide comments to INPO.


Victor Stello, Jr.
Executive Director for Operations
U.S. Nuclear Regulatory Commission


Jack T. Pate
President
Institute of Nuclear Power Operations

Effective Date: October 20, 1988