

PDR-016



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

SEP 20 1984

Mr. Michael Totten, Director
Public Citizen's Critical Mass Energy Project
215 Pennsylvania Avenue, SE
Washington, DC 20003

IN RESPONSE REFER
TO FOIA 84-44

Dear Mr. Totten:

This is a final response to your letter dated January 16, 1984, in which you requested, pursuant to the Freedom of Information Act, documents from the Institute of Nuclear Power Operations (INPO) and the NRC that describe, analyze, or evaluate INPO's role or procedures in reporting its information to the NRC.

The documents listed in the enclosed Appendices N and O, with the exception of the 18 documents noted on the appendices with asterisks, are being made available in the NRC Public Document Room. Those records indicated with a single asterisk on the appendices are being withheld in their entirety. Those records indicated with a double asterisk are being withheld in part. These records are being withheld pursuant to Exemption (4) of the Freedom of Information Act (5 U.S.C. 552(b)(4)) and 10 CFR 9.5(a)(4) of the Commission's regulations for the same reasons set forth in Mr. Zack T. Pate's letter of May 31, 1984, a copy of which was previously furnished to you.

This is a final agency action with respect to Appendices N and O. As set forth in the Freedom of Information Act (5 U.S.C. 552(a)(4)(B)), judicial review of this decision is available in a district court of the United States in either the district in which you reside, have your principal place of business, or in the District of Columbia.

This completes NRC's action on your request.

Sincerely,

William J. Dircks
Executive Director for Operations

Enclosures: As stated

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COMMISSIONER CORRESPONDENCE
AND OTHER DOCUMENTS

APPENDIX H

1. 10-18-83 Letter to Lelan Sillin from Thomas Roberts ref: NRC reconsider two sections of SECY-83-248 w/attachments (1) 8-29-83 letter from INPO to Nunzio Palladino w/attachment, (2) 8-22-83 letter from INPO to Mr. Lelan Sillin w/attachments. (15 pages)
2. Duplicate Eliminated
3. 6-20-83 Letter to Thomas Roberts from E. P. Wilkinson (INPO) transmitting INPO Institutional Plan dtd May 1983.
- *4. Misc. INPO Plant Visit Schedule Form used for Vogtle Site.(32 pages)
5. 4-15-82 The Chronology of the Development of the Institute of Nuclear Power Operations. (14 pages)
6. 3-19-82 INPO Status and Evaluation Program by E. P. Wilkinson. (23 pages)
- *7. Undated Misc Plant Procedures. (8 pages)
- *8. 4-23-82 Construction Project Evaluation Program. (3 pages)
- **9. 1-25-84 Letter to Frederick Bernthal from E. P. Wilkinson (INPO) transmitting copy of Guidelines for Quality Control Inspector and Nondestructive Examination Technician Training, INPO 84-003, January 1984.
- *10. 8-83 Institute of Nuclear Power Operations Good Practice OA-102 Performance Monitoring - Management Information by E. P. Wilkinson. (53 pages)
- *11. 11-8-83 Letter to Frederick Bernthal from E. P. Wilkinson transmitting speeches from CEO Workshop. (50 pages)
12. 8-18-82 Letter to James Asselstine from E. P. Wilkinson transmitting miscellaneous INPO documents plus INPO Annual Report 1980.
13. 11-1-80 Voluntary Assistance Agreement by and among Electric Utilities involved in Transportation of Nuclear Materials. (13 pages)
14. 6-82 Emergency Operating Procedures Implementation Guideline INPO 82-016
15. Duplicate Eliminated

* Documents being withheld in entirety

**Documents being withheld in part

16. Duplicate Eliminated
17. Duplicate Eliminated
18. 5-82 INPO's Nuclear Power Plant Job and Task Analysis. (6 pages)
- *19. 9-81 INPO's A Survey of Occupational Employment and Training in the Nuclear Power Industry, Report No. 1.
20. 9-1-81 INPO's CEO Workshop 1981.
21. 5-21-80 INPO's CEO Workshop 1980.
22. Eliminated
23. 6-20-83 Letter to James Asselstine from E. P. Wilkinson transmitting INPO's Institutional Plan May 1983.
24. 8-82 INPO Analysis and Engineering Division. (30 pages)
25. 10-5-82 INPO's Using Operating Experience and NPRDS Effectively. (23 pages)
26. Undated Introduction by L. F. Sillin. (5 pages)
Undated Budget Process by E. P. Wilkinson. (3 pages)
Undated AD HOC Resources Committee by H. G. Parris. (7 pages)
Undated Next Year's Program by J. D. Selby. (5 pages)
Undated Wrap-up by L. F. Sillin. (1 page)
27. 6-30-82 Letter to Nunzio Palladino from E. P. Wilkinson ref: AIF Committee on Nuclear Plant Design w/attachments. (17 pages)
28. 6-30-82 Letter to Nunzio Palladino from E. P. Wilkinson ref: CE Program w/attachments. (13 pages)
29. Duplicate Eliminated
30. 1981 INPO 1981 Annual Report
31. 10-28-82 Letter to James Asselstine from E. P. Wilkinson ref: CEO Workshop. (1 page)
32. 7-27-82 Memo to Commissioners from William Dircks ref: Coordination with INPO. (6 pages)

*Documents being withheld in entirety

33. 7-21-82 Letter from E. P. Wilkinson to James Asselstine ref: CEO Workshop w/attachments from workshop.
 34. Duplicate Eliminated
 - *35. 3-17-82 Revision #4, Guidelist, Project Planning (52 pages)
 36. 3-16-82 Scheduling notes for briefing on nuclear power plant survey (INPO) (1 page)
 37. Undated Inpo Evaluation Results by E. P. Wilkinson, pgs 27-43 (17 pages)
 - **38. 11-7-83 Memo to NRC Commissioners from E. P. Wilkinson ref: NPRDS Data Processing Monthly Report for October 1983 (19 pages)
 39. 5-17-83 Letter to Nunzio Palladino from E. P. Wilkinson ref: INPO's 1983 CEO Workshop (1 page)
 40. 3-11-83 Remarks by Industry Representatives to the Commissioners NRC, Ref: Construction Project Evaluation Program (16 pages)
 41. 8-29-83 Letter to Palladino from Zack Pate ref: INPO's 1983 CEO Workshop w/Registration and logistic materials attached (4 pages)
 42. Undated Project Evaluation Program Performance Objectives (1 page)
 43. 3-18-82 Construction Control Revision #1 (18 pages)
 44. 3-17-82 Organization and Administration Revision #2 (9 pages)
 45. 3-17-82 Project Support Revision #4 (19 pages)
 - *46. 3-18-82 Revision #2, Guidelist, Organizational Structure and Responsibilities (19 pages)
 - *47. 3-16-82 Revision #2, Guidelist, Design Organization (43 pages)
 - *48. 3-16-82 Revision #1, Guidelist, Construction Organization (42 pages)
 49. 9-20-82 Letter to James Asselstine from E. P. Wilkinson w/enclosure dtd 9/3/82 w/attachments ref: CEO Workshop Summary of Comments and Suggestions From CEO Workshop and Board Action
 - *50. 1/24/84 INPO Evaluation Reports (18 pages)
- *Documents being withheld in entirety
**Documents being withheld in part

APPENDIX O

Listing of Miscellaneous Records Concerning INPO

1. 6-22-81 Memo for Denton from Michelson ref: Review of the INPO/NSAC SEE-IN PROGRAM
2. 12-22-80 Memo for Arlotto from Medeiros ref: DECISIONS FOR DEGRADED COOLING RULEMAKING
3. 2-25-81 Letter to E. P. Wilkinson from William J. Dircks ref: REGULATORY GUIDE 1.8, REVISION 2 PERSONNEL QUALIFICATIONS AND TRAINING
4. 2-25-81 Memo for IOER System Task Force from Hebdon ref: INTEGRATED OPERATIONAL EXPERIENCE REPORTING SYSTEM
5. 5-15-81 Memo for Commissioners from William J. Dircks ref: APPROVAL OF THE MEMORANDUM OF AGREEMENT ON A COOPERATIVE RELATIONSHIP FOR THE COLLECTION AND FEEDBACK OF OPERATIONAL EXPERIENCE INFORMATION AND DATA FOR NUCLEAR POWER PLANTS
6. 5-26-81 Letter to E. P. Wilkinson from William J. Dircks ref: MEMORANDUM OF AGREEMENT ON A COOPERATIVE RELATIONSHIP FOR THE COLLECTION AND FEEDBACK OF OPERATIONAL DATA
7. 2-12-82 Memo for Denton and DeYoung from Michelson ref: SERVICE WATER SYSTEM FLOW BLOCKAGES BY BIVALVE MULLUSKS AT ARKANSAS NUCLEAR ONE AND BRUNSWICK
- **8. 6-2-82 Letter to John Collins from Oscar Lee ref: FORT ST. VRAIN UNIT NO. 1 INPO EVALUATION
9. 12-1-82 Letter to Ken Strahm from James Norberg ref: COORDINATION OF INPO AND NRC TASK ANALYSIS PROJECTS
10. 2-19-82 Letter to Hugh Thompson from John Barrow and Edward Cobb ref: EMERGENCY OPERATING PROCEDURES IMPLEMENTATION ASSISTANCE (EOPIA) PROGRAM
11. 3-17-82 Memo to Dennis Ziemann from Brent Clayton and Michael Goodman ref: SUMMARY OF MEETING WITH INPO AND OWNERS' GROUPS REPRESENTATIVES ON THE INDUSTRY EOP IMPLEMENTATION ASSISTANCE PROGRAM
12. 6-15-82 Memo to Ron Haynes, James O'Reilly, James Keppler, John Collins and Robert Engelken from Michelson ref: CURRENT STATUS OF THE COOPERATIVE RELATIONSHIP WITH INPO REGARDING OPERATIONAL DATA

**Documents being withheld in part

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13. 4-22-83 Memo to Patricia Norry from C. Heltemes ref: RECEIPT AND MAINTENANCE OF INPO DOCUMENTS
- *14. 11-29-82 Memo to James Taylor thru James partlow from William Fisher ref: REVIEW OF THE INPO EVALUATION AT OYSTER CREEK
- **15. 8-31-82 Letter to J. Collins from E. Wilkinson ref: PERFORMANCE OBJECTIVES AND CRITERIA FOR CORPORATE ASSISTANCE VISITS AND EVALUATIONS
16. 12-13-82 Letter to John Desteese from Carlyle Michelson ref: PEER REVIEW OF CASE STUDY REPORT
17. 11-17-82 Letter to Robert Baer from S. Rosen ref: OVEREXPOSURE IN PWR REACTOR CAVITIES
- **18. 11-22-82 Letter to Hugh Thompson from K. Strahm ref: TECHNICAL COMPARISON OF INPO AND NRC TASK ANALYSIS PROJECTS
- **19. 12-28-82 Memo to Misc Addressees from Carlyle Michelson and Richard DeYoung ref: IMMEDIATE NOTIFICATION REQUIREMENT FOR OPERATING NUCLEAR REACTORS (10 CFR 50.72) AND THE LICENSEE EVENT REPORT (LER) SYSTEM (10 CFR 50.73)
20. 3-24-83 Letter to John Collins from R. Buntain ref: INPO EVALUATION REPORT FOR COOPER NUCLEAR STATION
21. 4-29-83 Letter to H. Hoy from Matthew Chiramal ref: DRAFT REPORT ON POTENTIALLY DAMAGING FAILURE MODES OF HIGH AND MEDIUM VOLTAGE EQUIPMENT
22. 5-13-83 Letter to William J. Dircks from E. Wilkinson ref: INPO INSTITUTIONAL PLAN
23. 5-24-83 Letter to E. Wilkinson from William J. Dircks ref: CONTROL POINT WITHIN NRC AND INPO TO MONITOR EFFORTS
24. 6-13-83 Letter to K. Strahm from Hugh Thompson ref: INPO'S PROVIDING INFORMATION TO BROOKHAVEN LABS
25. 7-7-80 Letter to R. F. Fraley from E. P. Wilkinson ref: Information on the Activities of the Institute of Nuclear Power Operations as Work Progresses
26. 12-19-80 Letter to R. A. Hartfield from R. L. Haueter re: Changes to the NPRD Report Form
27. 10-20-80 Letter to C. Michelson from S. L. Rosen re: Transmittal of AIF Speech

*Documents being withheld in entirety

**Documents being withheld in part

#1

JUN 22 1981

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

FROM: Carlyle Michelson, Director
Office for Analysis and Evaluation of
Operational Data

SUBJECT: REVIEW OF THE INPO/NSAC SEE-IN PROGRAM

As we discussed with the EDO, NRR will have the lead in determining the acceptability of the INPO/NSAC SEE-IN screening and evaluation process to fulfill certain NRC requirements pertaining to the collection, analysis, and feedback of operational experience information. We have worked closely with your staff on this subject in the past, including the joint preparation of an Information Paper to the Commission.

Because of our background and discussions with INPO/NSAC on this subject, we thought that our understanding and view of the situation may be helpful to your staff. Consequently, the enclosures document attempts to organize some of the available information and our comments for your consideration and use.

Please let me know if we can provide any additional assistance.

Original Signed by
Carlyle Michelson

Carlyle Michelson, Director
Office for Analysis and Evaluation
of Operational Data

See File Jacket

Enclosures:

Distribution:
Central File ✓
AEOD Reading File
AEOD Chron. File
CJHeltemes, AEOD
CMichelson, AEOD

*ID&R-5-1
OPERATIONAL
EXPERIENCE*

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CF SUBJ
- ID&R-5-10P EX CF

OFFICE	AEOD	AEOD <i>BM</i>					
SURNAME	CJHeltemes:gt	CMichelson					
DATE	6/14/81	6/22/81					

Approved by the Director - ALOE - 27/1981

BACKGROUND INFORMATION CONCERNING REVIEW OF THE INPO/NSAC
SCREENING AND PRELIMINARY EVALUATION PROGRAM

Prepared by the
Office for Analysis and Evaluation
of Operational Data

Section Contents

1. Statement of Concept and Need
2. Discussion of NRC Requirements Regarding
Utility Review of Operational Experience
3. Discussion of Issues to be Resolved and
Suggested Approach for Resolution
4. Memorandum of Agreement Between INPO/NSAC
and the US NRC
5. Proposed Utility Use of SEE-IN Program
6. INPO/NSAC SEE-IN Program (Draft)
7. References

*IDAR 2-1
Operating Experience*

SECTION 1

Statement of Concept and Need

The concept and need from the NRC's staff perspective for an INPO/NSAC screening and preliminary evaluation process was described in an Information Paper to the Commission (SECY-81-121 dated February 24, 1981). This paper was forwarded to INPO/NSAC by letters dated February 25, 1981 from Carl Michelson (References 1 and 2).

As mentioned in the paper, discussions with INPO/NSAC have indicated general support and encouragement for this approach. INPO/NSAC believes their programs are systematic, documented, and effective, and that it is inefficient and inappropriate to require all licensees to independently assess operating information from the many available sources. Thus, there seems to be general agreement on the objective, concept, scope, and approach for the screening service. The principal subject where there is not yet agreement concerns the method used by the NRC to verify that routine implementation of the SEE-IN program, after NRC acceptance, is adequate. As discussed in Section 3, additional thought and work needs to be done on this important aspect.

SECTION 2

Discussion of NRC Requirements on Utility Review of Operational Experience

The accident at TMI-2 clearly indicated the need for each utility to have an effective and documented program for the collection, assessment and feedback of operational experience. Consequently, the NRC has required that "each utility shall carry out an operating experience assessment function that will involve utility personnel having collective competence in all areas important to plant safety," (NUREG-0737, pages 3-47).

NRC requirements flowing from TMI-2 related assessments have been collected and presented in NUREG-0737, "Clarification of TMI Action Plan Requirements" dated November 1980. This document includes two sources of requirements related to operational experience assessment for operating plants and three sources for operating license applicants. These requirements have been implemented through letters to licensees and are summarized in the following sections:

- a. Operating Plants - All operating plants have been required since June 1, 1981 to assess operating experience in conformance with item 1A1.1 "Shift Technical Advisor" and 1.C.5 "Procedures for Feedback of Operating Experience to Plant Staff."

The requirements for the Shift Technical Advisor (STA) (Item 1.A.1.1) states in part that "the licensee shall assign normal duties to the STAs that pertain to the engineering aspects of assuring safe operation of the plant, and including the review and evaluation of operating experience." No changes are made from the previous requirements stated in an October 30, 1979 letter from H. R. Denton to all operating nuclear power plants which, by reference, indicated that a specific duty of STAs would be: "Engineering evaluation(s) of the operating history of the plant (equipment failures, design problems, operations error, etc.) and Licensee Event Reports from other plants of similar design, with suitable dissemination of the results of such evaluation to other members of the plant staff." (NUREG-0573, pages A-50).

NRC requirements for procedures dealing with feedback of operating experience (item 1.C.5) include the following important aspects: (a) "...assure that operating information pertinent to plant safety originating within and outside the utility organization is continually supplied to operators and other personnel and is incorporated into training and retraining programs," (b) "...assurance be provided that high priority matters are dealt with promptly and that discrimination is used in the feedback of other information," (c) "...assessment of operating experience with review information from a variety of sources. These include operating information from the licensee's own plant(s), publications such as IE bulletins, circulars, and

notices and pertinent NRC or industrial assessment of operating experience," and (d) "...technical reviews be conducted to preclude premature dissemination of conflicting or contradictory information."

Thus, these provisions taken together state a requirement for each utility to collect, evaluate, and feedback the lessons of operating experience to all operations personnel. Specifically, technical reviews are required of essentially all sources of operational experience, both within and outside the utility. For example, outside sources include LERs from other plants, operational experience assessments from other sources, and IE bulletins, circulars, and notices. The technical reviews are to be in sufficient depth to: segregate the significant items; assign an appropriate priority; assure consistency and validity; and identify recommended actions based upon the review. Additionally, these technical reviews are to involve collective competence in all areas important to plant safety.

- b. Operating License Applicants - All applicants for an Operating License are required to meet the above operating plant requirements. In addition, each applicant is required (NUREG-0737, Task 1.B.1.2) to establish an onsite independent safety engineering group (ISEG) who, as a specific function, is to examine "...operating experience information that may indicate a need for improving plant safety." The ISEG is to have a minimum of five dedicated, full-time engineers, located onsite, but reporting offsite to a corporate official. NUREG-0731 (page 15) further defines the operational experience review role of the ISEG as coordinating "comparisons of the operating experience of the plant and plants of similar design."

Thus, all plants which are granted an operating license after June 26, 1980 are required to provide an ISEG. A specific function of this group is to know and understand the lessons of operating experience from other plants similar in design and to initiate actions based upon such assessments.

SECTION 3

Discussion of Items to be Resolved and Suggested Approach for Resolution

1. Acceptability of the INPO program in partial fulfillment of NRC requirements.

A draft copy of the current INPO SEE-IN program (Section 6) is provided which addresses the NRC requirements contained in 1.C.5. INPO has indicated (Reference 3) that a description of the SEE-IN program would be formally sent for review and comment after agreement was reached with the NRC on the Memorandum of Agreement. This agreement has now been completed (Section 4 -- effective June 1, 1981) so the program description should be expected shortly.

NRC actions required to be completed:

- a. Branch review responsibility and schedule established within NRR.
 - b. Acknowledge acceptance of the INPO/NSAC SEE-IN program description, assign a reviewer, and initiate review.
 - c. Questions and/or discussion with INPO/NSAC as necessary to reach agreement.
 - d. Issuance of a formal finding that the SEE-IN program is an acceptable option that can be endorsed and used by individual utilities in fulfillment of specified NRC requirements for the collection, assessment, and feedback of operating information.
2. Method and responsibilities for assuring acceptability of INPO/NSAC program implementation.

It is recognized by all parties that NRC carries the responsibility for continued assurance that the requirements flowing from its regulations are being properly implemented. In the case of NRC licensees, the effectiveness of implementation is routinely verified by means of IE onsite representatives and/or periodic inspections by regional personnel.

In the Commission Paper on the INPO/NSAC screening service, the staff indicated that such an activity would be subject to a centralized, periodic audit under the NRC's Vendor Inspection Program. This IE program inspects contractors and other nonlicensee organizations who are performing a safety-related service for or supplying safety-related components to a licensee.

However, in the case of the proposed screening service, INPO/NSAC has indicated that they believe it would be inappropriate for IE personnel to conduct periodic audits of their review processes because neither INPO/NSAC is contractor or licensee. INPO/NSAC believes, instead, that the effectiveness of their review process can be adequately assessed through review of the screening results and occasional reports that will be available as a result of the Memorandum of Agreement. They further indicate that there will be many opportunities to assess the INPO/NSAC program in the normal course of implementing the Memorandum of Agreement.

Thus, an arrangement will have to be worked out with INPO/NSAC regarding the method of assurance that the program plan is being routinely and effectively implemented and then responsibility can be assigned within the agency for this determination.

NRC actions required to be completed:

1. Develop possible approaches to gaining the necessary assurance that the program is being effectively implemented. Such as:
 - a. Inspection of INPO/NSAC by IE (LCVIP, Region II, or headquarters).
 - b. Monitor INPO/NSAC screening results/reports. (NRR/AEOD/IE)
 - c. Periodic assessment based upon interaction and documents associated with the Memorandum of Agreement. (AEOD/NRR)
 - d. Periodic onsite reviews of INPO/NSAC's SEE-IN program by AEOD or NRR.
2. Review potential/suggested approaches with other involved NRC offices, e.g., AEOD and IE.
3. Discuss arrangements acceptable to NRC with INPO/NSAC.
4. Finalize arrangement or develop and coordinate other possible approaches.

SECTION 4

Memorandum of Agreement Between INPO/NSAC and the US NRC on a
Cooperative Relationship for the Collection and Feedback of
Operational Experience Information and Data for Nuclear Power
Plants.

SECTION 5

Proposed Utility Use of SEE-IN Program.

December 5, 1980

SUBJECT: Utility Use of SEE-IN Program in
Responding to Item I.C.5 of
NUREG 0660

Dear :

The purpose of this letter is to provide member utilities with information on how INPO/NSAC's Significant Event Evaluation and Information Network (SEE-IN) Program might be used to partially satisfy the requirements of Item I.C.5 of the NRC Action Plan (NUREG 0660).

Item I.C.5 requires that, by January 1, 1981, operating reactor licensees and applicants for Operating Licenses review and revise their procedures, as necessary, to ensure the feedback of operating experience to plant staffs. NRC letters from D. G. Eisenhut, dated May 7 and September 5, 1980, provided clarification of the NRC's position on this requirement. At the November 1980 INPO/NSAC Operating Experience Review Workshop, INPO and NSAC suggested that the operating experience review program we have undertaken might be used by utilities in partial fulfillment of the I.C.5 requirements.

We recommend that use of the INPO/NSAC program (the Significant Event Evaluation and Information Network, SEE-IN) be incorporated into utility responses to I.C.5. Utilization of this program should simplify individual utility responses, facilitate meeting the January 1, 1981 implementation deadline, and avoid much of the duplication of effort which will occur if each utility independently attempts to satisfy all of the I.C.5 requirements. Thus, individual utilities should be able to devote more effort to analyzing in-house experience and ensuring the timeliness and adequacy of responses to problems identified.

Enclosure (1) is a copy of the INPO/NSAC SEE-IN Program Description. Enclosure (2) is a copy of the detailed NRC position on Item I.C.5, extracted from the May 7 NRC letter, provided for your convenience. Enclosure (3) provides information on the use of the SEE-IN Program in partially meeting the requirements of I.C.5.

Should you have any questions, please contact Mr. S. L. Rosen, INPO Director of Analysis, at (404) 953-7602.

Sincerely,

E. P. Wilkinson
President, INPO

EPW/ks
Enclosures

POSITION

In accordance with Task Action Plan I.C.5, Procedures for Feedback of Operating Experience to Plant Staff, each licensee shall review its procedures and revise them as necessary to assure that operating information pertinent to plant safety originating both within and outside the utility organization is continually supplied to operators and other personnel and is incorporated into training and retraining programs. These procedures shall:

- (1) Clearly identify organizational responsibilities for review of operating experience, the feedback of pertinent information to operators and other personnel and the incorporation of such information into training and retraining programs;
- (2) Identify the administrative and technical review steps necessary in translating recommendations by the operating experience assessment group into plant actions (e.g., changes to procedures; operating orders);
- (3) Identify the recipients of various categories of information from operating experience (e.g., Supervisory personnel, STA's, operators, maintenance personnel, H. P. technicians) or otherwise provide means through which such information can be readily related to the job functions of the recipients.
- (4) Provide means to assure that affected personnel become aware of and understand information of sufficient importance that should not wait for emphasis through routine training and retraining programs;
- (5) Assure that plant personnel do not routinely receive extraneous and unimportant information on operating experience in such volume that it would obscure priority information or otherwise detract from overall job performance and proficiency;
- (6) Provide suitable checks to assure that conflicting or contradictory information is not conveyed to operators and other personnel until resolution is reached; and,
- (7) Provide periodic internal audit to assure that the feedback program functions effectively at all levels.

DISCUSSION

Each utility is expected to carry out an operating experience assessment function which will involve utility personnel having collective competence in all areas important to plant safety. In connection with this assessment function it is important that procedures exist to assure that important

information on operating experience originating both within and outside the organization is continually provided to operators and other personnel and that it is incorporated into plant operating procedures, and training and retraining programs.

Those involved in the assessment of operating experience will review information from a variety of sources. These include operating information from the licensee's own plant(s), publications such as IE Bulletins, Circulars and Notices, and pertinent NRC or industrial assessments of operating experience. In some cases, information may be of sufficient importance that it must be dealt with promptly (through instructions, changes to operating and emergency procedures, issuance of special precautions, etc.) and must be handled in such a manner to assure that operations management personnel would be directly involved in the process. In many other cases, however, important information will become available which should be brought to the attention of operators and other personnel for their general information to assure continued safe plant operation. Since the total volume of information handled by the assessment group may be large it is important that assurance be provided that high-priority matters are dealt with promptly and that discrimination is used in the feedback of other information so that personnel are not deluged with unimportant and extraneous information to the detriment of their overall proficiency. It is important, also, that technical reviews be conducted to preclude premature dissemination of conflicting or contradictory information.

CLARIFICATION

Review of and modifications to procedures governing feedback of operating experience to plant staff shall be completed and the procedures put into effect on or before January 1, 1981.

ACTION: (Class I)

- (1) Licensee to implement actions and submit documentation of the method for staff review by scheduled dates.

UTILITY USE OF SEE-IN PROGRAM
TO PARTIALLY SATISFY ITEM I.C.5 OF NUREG 0660

The attached Program Description (Enclosure 1) provides details about the operation of the SEE-IN Program; Section 3 of this attachment briefly outlines the general manner in which a utility program might interface with SEE-IN. For the purposes of satisfying I.C.5, the significant element of this interface is the operating experience screening effort conducted by INPO and NSAC. Since we review the operating experience of all plants, we believe that utilities may utilize the results of our evaluations of operating experience at plants other than their own. With appropriate internal dissemination and action, this should satisfy the general requirement of I.C.5 for feedback of operating information originating from outside the utility organization.

Some of the operating experience information we review originates from sources other than operating plants such as NSSS vendors, A/E's, and the NRC. Such information might, therefore, be construed by a utility as originating "external to the utility organization", even though the information concerns that utility's own plant(s). We consider it inadvisable for a utility to take credit for our review of such information dealing specifically with its own plants.

In our view, SEE-IN will also help to satisfy some of the requirements (Enclosure 2), detailed in the May 7 and September 5 NRC letters as they pertain to external operating experience. Positions 1, 2, and 3 of I.C.5 deal with matters internal to the utility, although some reference to the interface with SEE-IN will probably be needed in the individual utility procedures that address these requirements. Position 4 mandates the prompt dissemination of important information in advance of and apart from routine training and retraining programs. SEE-IN supports this requirement in two ways. Significant events identified during our screening process are initially entered on NOTEPAD to provide early notification of such events to all utilities. Additionally, Significant Operating Experience Reports (SOERs) are sent to utilities after further analysis by INPO and NSAC. SOERs are color-coded to indicate suggested priority -- red (immediate attention), yellow (prompt attention), and green (normal attention). Our rigorous screening and action analysis procedures (discussed in sections 2.2 and 2.3 of the attached Program Description) and the above described color-coding of SOERs were designed to address the concerns which prompted position 5.

With respect to position 6, INPO and NSAC are taking or have taken a number of steps to avoid the dissemination of conflicting or contradictory information. First, the early posting on NOTEPAD of significant events, identified during our screening process, not only provides the early notification to utilities mentioned earlier, but also affords the utilities an opportunity to comment on these events and point out any discrepancies. Next, our action analysis procedures include provisions for investigating other planned or actual work by the NRC, NSSS vendors, EPRI, or others dealing with the event in question. In addition, our action analysis efforts include the involvement of the affected utility, NSSS vendors, and other contractors as necessary during the conduct of these analyses and the preparation and review of associated reports. Finally, the quality and diversity of our personnel engaged in the screening and analysis efforts helps to ensure the comprehensiveness and accuracy of information provided by SEE-IN. Despite these steps, conflicts or contradictions may occasionally arise. In these cases, INPO and

NSAC will work to resolve those conflicts or contradictions and support their resolution as quickly as possible.

Position 7 requires that utilities perform periodic internal audits of program effectiveness. We are of the opinion that utilities must establish their own audit programs to meet this requirement. Even though INPO may review the effectiveness of utility programs to evaluate and act upon operating experience as part of the periodic evaluations of operating plants, we do not believe that utilities should take credit for that review for the purpose of satisfying position 7.

We anticipate that individual utilities who plan to utilize the SEE-IN Program in their response to I.C.5 may need to ensure that the effectiveness of this program is reviewed from time to time. If individual utilities wish to conduct such reviews, we would certainly cooperate. However, our technical activities are subject to the scrutiny of Industry Review Groups composed of top-notch representatives from members utilities. We believe that this on-going review of SEE-IN Program effectiveness should make reviews by individual utilities unnecessary.

Discussions are continuing with the NRC regarding a formal memorandum of understanding which will define the extent to which utilities may rely upon INPO and NSAC in meeting I.C.5. To support these discussions, we are refining our procedures to ensure that they satisfy the I.C.5 requirements by the January 1, 1981 deadline. We, therefore, anticipate that utility procedures in response to I.C.5 requirements that incorporate the use of SEE-IN will be generally acceptable to the NRC.

SECTION 6

INPO/NSAC SEE-IN Program