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FEB 11 1982

MEMORANDUM FOR: William J. Dircks
Executive Director for Operations

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

SUBJECT: MEETING WITH INPO - RADIATION PROTECTION PLANS

Your memorandum dated December 2, 1981 (Item 1.) directed NRR, in coordination with RES, to discuss with INPO a goal of making INPO's efforts compatible with the primary intent of rulemaking. As you know RES and NRR staff members had held a number of discussions with INPO staff on this matter for some time.

The subject of NRC-INPO coordination on Radiation Protection Plan was one of the items on the agenda for our meeting with Mr. Wilkinson on Monday, January 25, 1982. In coordination with both RES and OIE, we arrived at essential agreement with INPO on this item, encompassing the following:

1. An Appendix to the "umbrella" Memorandum of Agreement between NRC and INPO is targeted for signatures by April 2, 1982. NRR/DSI has the lead for the staff work to prepare this, in consultation with INPO staff.

2. The staff will proceed with the development of a Commission paper which will recommend amending 10 CFR Part 20 to (1) require all licensees to develop and implement occupational radiation protection programs, and (2) specify that licensees who are required by the Commission to perform personnel dosimetry, bioassays or air sampling must include in the programs effective measures for maintaining occupational exposures ALARA. RES has the lead for completion of this action. The paper will recognize the coordination with INPO.

3. The proposed Regulatory Guide (revision of NUREG-0761) will not be published at this time, pending NRC's evaluation of the success of the INPO program over a period of one to two years.

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XA 288

Original Signed by
H. R. Denton
Harold R. Denton, Director
Office of Nuclear Reactor Regulation

cc: RMinogue
RDeYoung
VStello
CMichelson

*SEE PREVIOUS CONCURRENCE

OFFICE	DSI:RP*	DSI*	RES:DFO*	NRR			
NAME	RWHouston:csp	RJMattson	KGoller	HRDenton			
DATE	2/2/82	2/3/82	2/8/82	2/11/82			

NRC FORM 318 (10-80) NRCM 0240

OFFICIAL RECORD COPY

USGPO 1980—329-824

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

TO ALL LICENSEES OF OPERATING PLANTS, APPLICANTS FOR OPERATING LICENSES AND HOLDERS OF CONSTRUCTION PERMITS

Gentlemen:

SUBJECT: USE OF INPO SEE-IN PROGRAM (GENERIC LETTER NO. 82-04)

Item I.C.5 of the TMI Action Plan, requires licensees to develop procedures to assure that important operating experience originating both within and outside the utility organization is continually provided to operators and other personnel, and is incorporated into training and retraining programs. Accomplishing this task requires that a utility assure that all events that occur throughout the industry are screened to determine whether or not they are applicable to the utility's plant, and that those events which could be significant are evaluated for applicability to the utility's plant.

The initial screening process is a large undertaking involving several thousand event reports each year from the U. S. nuclear plants alone. Such an undertaking by any one utility is both expensive and demanding of resources.

In an effort to provide a mechanism for central collection and screening of all events from both U. S. and foreign nuclear plants, the Institute of Nuclear Power Operations (INPO) has established a Significant Event Evaluation and Information Network (SEE-IN). The latest description of the SEE-IN program is provided in a January 1982 program description from INPO entitled "Significant Event Evaluation and Information Network (SEE-IN)."

The NRC has now completed its review of the SEE-IN program and a recent letter to INPO (copy enclosed) endorses utility use of the program. As stated in the letter, use of SEE-IN will relieve individual nuclear plant operators and constructors of the necessity of setting up large staffs to obtain and screen the large volume of raw data pertaining to operational experience throughout the industry. The NRC believes that full participation in SEE-IN will enhance your ability to meet the intent of the procedures approved under TMI Action Plan Item I.C.5.

Participation in SEE-IN does not relieve a utility from taking those actions specific to the utility's nuclear unit which result from an evaluation of operational experiences. Each utility is still required to have an internal procedure for handling operational experience information, including the procedures necessary to assure that appropriate individuals are provided the results of evaluations and that recommendations for corrective action identified as a result of evaluation are translated into actions. The interface between SEE-IN and the functions and responsibilities of the utility necessary to satisfy the requirements of Item I.C.5 are discussed in Section 3 of the SEE-IN program description.

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The NRC believes that utilization of the SEE-IN program will result in the elimination of duplication which will occur if each utility attempts a separate evaluation of significant plant operation events. The centralization of this initial screening effort at INPO should result in a more efficient evaluation and will allow you to concentrate your efforts on evaluating the events that occur in your plant and those that are identified through SEE-IN as being applicable or potentially applicable to your plant.

The full potential of the SEE-IN program can be realized only if all utilities participate actively, both in furnishing event information to INPO and in taking corrective actions as necessary when potential problems have been identified as a result of INPO efforts. The SEE-IN program is acceptable to the staff with no additional review required. Your participation in the SEE-IN program is strongly encouraged.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

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

2/12/82

TO ALL LICENSEES OF OPERATING PLANTS, APPLICANTS FOR OPERATING LICENSES AND HOLDERS OF CONSTRUCTION PERMITS

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Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

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

This memorandum between the Institute of Nuclear Power Operations (INPO) and the U.S. Nuclear Regulatory Commission (NRC) 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. Mutual and complementary activities, as defined in appendices to this Agreement, will help ensure that the goals of both organizations are achieved in the most efficient and effective manner without diminishing or interfering with either parties' responsibilities or authorities.

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 interchange of information to support the common goals of both organizations.

NRC will consider and, to the extent appropriate, factor into its Rules and Regulatory Guides the information and recommendations provided by INPO. Further, 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, if not otherwise restricted from further distribution. Both parties recognized 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. 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.

The parties to the Agreement will meet periodically to discuss the major activities underway and planned in each area of agreement. The objectives of such coordination meetings are to provide up-to-date information on each organization's overall plans, and to help in the most effective allocations of resources. 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. Requests for or agreements on actions will be addressed through routine correspondence.

In addition to meetings, it is expected frequent, informal communications will exist among the parties with regard to the nature and scope of activities in progress or planned.

This Agreement supersedes the previous Agreement dated May 26, 1981.

William J. Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission

E. P. Wilkinson
President
Institute of Nuclear Power Operations

Effective Date: April 1, 1982

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APPENDIX NUMBER ONE

EXCHANGE OF OPERATIONAL EXPERIENCE DATA

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

This appendix to the Memorandum of Agreement between the Institute of Nuclear Power Operations (INPO) and the U.S. Nuclear Regulatory Commission (NRC) reflects a cooperative relationship in the collection and feedback of operational experience, information and data related to the safety of nuclear power plants. The Appendix, in conjunction with the base Memorandum of Agreement reflects the scope of the agreements.

1. Collection of Operational Data

Since: (a) it is a common objective that reporting of information and data be efficient and duplicative reporting be eliminated: (b) the validity of analysis results may depend upon the completeness of input information; and (c) the effectiveness of operational data feedback is dependent upon a proper understanding of the implications inherent in reactor operating experience, INPO and NRC will endeavor to develop, maintain, and use a common data base related to reactor operating experience.

2. Computerized Data Storage and Retrieval

In order to improve the overall operational data base in terms of completeness, accuracy, and ability to search and recall specific information, INPO and the NRC will coordinate their efforts toward consolidation and improvement of NRC and industry-supported operational and engineering data bases.

3. Foreign Information

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 readily available for INPO analysis activities. Foreign information and data obtained by INPO that does not include restrictions on further dissemination will similarly be entered into the same computerized data base for ready access by NRC.

4. Significant Event Screening

INPO will provide the NRC with timely listings of the significant events which have been identified by the SEE-IN screening process as significant events for analysis. Similarly, the NRC will provide INPO with the results of its significant event screening procedure which identifies events for engineering evaluation or case study.

5. Exchange of Analysis and Evaluation Results

The results of completed and formally documented generic analysis and event evaluation of operational data, with the conclusions and recommendations, where applicable, will be regularly exchanged between the parties on a timely basis. In addition, it may be appropriate to have informal technical discussion on generic or event-related studies in progress which are of mutual interest as determined on a case-by-case basis by the organization conducting the study.

William J. Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission

E. P. Wilkinson
President
Institute of Nuclear Power Operations

Effective Date: April 1, 1982
Revision #1

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.
- o NRC recognizes INPO's efforts to promote safety in nuclear plant operations and quality in the design control and construction of nuclear plants.
- 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 to meet NRC's obligations to the public and the Congress.

2. INPO Activities

This section outlines current and planned INPO evaluation activities.

a. INPO will conduct evaluations of stations with an operating nuclear plant on a periodic basis. The interval between station evaluations will average about 15 months.

b. INPO will conduct evaluations of construction projects on a periodic basis. The interval between project evaluations will be about 18 months.

c. INPO will conduct evaluation and assistance visits related to corporate support of nuclear stations. This phase of INPO activities will be conducted coincident with (in close time proximity to) a station or project evaluation for each utility.

Accordingly, the goal for the interval between corporate evaluations for a given utility will be approximately 15 months.

d. INPO will prepare a written report for each evaluation. These reports for operating plants and construction projects will include appropriate utility responses in each area identified by INPO as needing improvement.

e. Each succeeding evaluation will include follow-up on the responses developed during the preceding evaluation.

3. NRC Review of INPO Activities

a. INPO will exert best efforts to have the utilities release the final evaluation reports for distribution to other INPO members and to the NRC. Provision of the reports to NRC is pivotal to the success of this coordination plan.

b. Current copies of INPO evaluation criteria will be provided to NRC (Division of Quality Assurance, Safeguards, and Inspection Programs, Office of Inspection and Enforcement).

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 each type of INPO evaluation several times annually. The NRC observer may be any person designated by NRC (Division of Quality Assurance, Safeguards, and Inspection Programs, Office of Inspection and Enforcement). Where NRC Regional personnel are utilized as observers, they would not normally accompany an INPO team in their Region.

d. INPO will brief personnel of the NRC Division of Quality Assurance, Safeguards, and Inspection Programs, Office of Inspection and Enforcement, periodically on all aspects of INPO's evaluation and assistance program and Construction Project Evaluation program. Again, while no specific intervals are considered necessary, briefings on about a quarterly basis are anticipated.

e. NRC review of INPO evaluation activities will be coordinated by the Division of Quality Assurance, Safeguards, and Inspection Programs, Office of Inspection and Enforcement. 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 and Assistance Program and Construction Project 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 to minimize NRC-sponsored evaluations or appraisals, referred to as Performance Appraisal Team inspections (PAT) and Construction Appraisal Team inspections (CAT).

b. INPO and NRC expect to coordinate Region-based regular inspections (involving two or more inspectors) and INPO evaluations to minimize the impact on the utility involved.

c. In accordance with established Commission enforcement policy, NRC will normally forego enforcement action that could otherwise result when a utility discovers and reports as necessary a noncompliance as a result of an INPO evaluation. The exceptions involve Severity Level I, II, or III violations as defined by the NRC Enforcement Policy, or Severity Level IV violations discussed in a previous enforcement conference. In those cases, NRC may apply its Policy as for other licensee-identified violations of these levels. (Severity Level I and II are violations that are of very significant regulatory concern. In general, violations that are included in these severity categories involve actual or high impact on the public. Severity Level III violations are cause for significant regulatory concern.)

William J. Dircks
Executive Director, Operations
U. S. Nuclear Regulatory Commission

E. P. Wilkinson
President
Institute of Nuclear Power Operations

Effective Date: April 5, 1983

APPENDIX NUMBER THREE

COORDINATION PLAN

FOR

NRC/INPO RADIOLOGICAL PROTECTION ACTIVITIES

1. Background

The purpose of this plan is to coordinate selected NRC and INPO utility radiological protection activities. It is also intended to provide a mechanism and a basis for NRC to take into account INPO efforts when determining the need for the development of any additional regulations or regulatory guides in this area.

There are several underlying assumptions:

- o NRC and INPO recognize the existence of mutually compatible objectives reflecting concerns for the radiological protection of individuals who work at nuclear power plants.

- o INPO has implemented a program of evaluation and assistance activities for its member utilities to review their radiological protection programs in order to achieve high standards of excellence and to minimize individual and collective occupational exposure. This is an integral part of INPO's utility evaluation program.

- o The NRC's objective is that its licensee's programs should reflect that every reasonable effort is being made to ensure that worker exposures are as low as reasonably achievable (ALARA).

- o INPO and NRC desire to minimize unnecessary duplication of effort.

2. Radiation Protection Program Guidance

a. The NRC may propose modifications or additions to its regulatory requirements in this area. The advice and recommendations of INPO on the value-impact of such proposals, based upon INPO's experience with its program, will be sought and considered. The NRC expects, however, that INPO's evaluation and assistance program, with support by its member utilities, is likely to result in improved radiation protection programs that meet the NRC's objective.

b. INPO has developed written performance objectives and criteria for radiological protection and will exert its best efforts to assist utilities to meet these objectives and criteria.

c. Documents used by INPO in implementing its evaluation and assistance program will be made available to the NRC and relevant information, knowledge, and experience in the area of radiation protection of workers will be shared.

INPO will upgrade its criteria and guidance documents as experience shows this to be necessary and desirable.

3. Plant Evaluations

Coordination of radiological protection program evaluations as part of INPO's plant evaluation activities will be in accordance with the Appendix Number Two "Coordination Plan for NRC/INPO Appraisal and Evaluation Activities."

4. NRC Recognition of INPO Radiological Protection Program

a. The NRC intends to review the effectiveness of utility efforts to demonstrate that reasonable progress has been or is likely to be made toward the achievement of NRC's ALARA objective. An initial review of the program will be completed not later than two years from the date of this plan.

b. The NRC will exert its best efforts to identify objective and measurable criteria that it will employ in this evaluation and will advise and consult with INPO on such criteria.

Among the criteria that NRC intends to use is the extent to which nuclear power plant licensees are successful in: (1) improving radiological protection training of workers and (2) minimizing individual and collective occupational dose, internal exposures, and the number of personnel contaminated with radioactivity.

William J. Dircks
Executive Director, Operations
U.S. Nuclear Regulatory Commission

E. P. Wilkinson
President
Institute of Nuclear Power Operations

Effective Date: April 5, 1983

APPENDIX NUMBER FOUR

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 and NRC share the goal of improving and maintaining the quality of nuclear utility training.
- o INPO recognizes the NRC's regulatory responsibilities.
- 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 Human Factors Coordination Meetings will continue to be held on approximately a quarterly basis with representatives from NRC's Division of Human Factors Safety (NRR), Human Factors Branch (RES-DFO), and INPO's Training and Education Division. At these meetings, ongoing projects and plans will be discussed. Opportunities to contribute to each other's projects will be identified. Written reports of progress and results will be exchanged.

b. An INPO observer will be invited to participate in the programmatic review meeting of the Human Factors Review Group. This group will advise the Director of the Office of Nuclear Reactor Regulation on INPO activities related to the Integrated Human Factors Program Plan.

c. Coordination in specific areas is covered by attachments as follows:

(1) Job and Task Analysis - attachment 1, (Revision 1)
(2) Performance-Based Training Implementation -attachment 2
(3) Accreditation of Training Programs - attachment 3

William J. Dircks
Executive Director, Operations
U.S. Nuclear Regulatory Commission

E. P. Wilkinson
President
Institute of Nuclear Power Operations

Effective Date: November 23, 1983

NRC/INPO Coordination Plan
Appendix Four

Attachment 1
(Revision 1)

JOB AND TASK ANALYSIS

Both NRC and INPO analyze (and/or contract for the analysis of) nuclear power plant jobs and tasks for the purpose of defining training and qualification requirements, developing licensed operator examinations, improving operating procedures, recommending staffing levels, and evaluating control room human factors considerations. It is recognized that the NRC, INPO, and nuclear utilities would benefit from coordination and sharing of data. It is agreed that the following actions will be taken:

1. The NRC and NRC contractors will collect job and task analysis data in such a manner that it can be incorporated into the INPO computerized data base. NRC will provide this data to INPO in machine readable form on tape.

2. INPO will provide the NRC and, with INPO approval on a limited, case-by-case basis, NRC designated National Laboratories with access to the job/task analysis data stored in the INPO computer system. INPO approval for National Lab access will be in writing from the Director, Training and Education Division. This will include data collected by the NRC and INPO. Access to this data will be via terminals located at the NRC and the NRC-designated laboratories, but will be limited to "read only" access. TYMNET costs will be borne by NRC which will be invoiced by INPO. Total access hours by NRC and its contractors will be limited to 30 hours per week during the time period 8:00 a.m. and 5:00 p.m. E.D.T. or E.S.T. Outside of those hours it is not considered necessary to specify limits at the present time.

3. NRC and INPO-approved NRC-designated National Laboratories may use the INPO job/task analysis for the following purposes:

   a) evaluation of human engineering designs of new control rooms and retrofitting current control rooms

   b) identification of skill and knowledge requirements of plant personnel

   c) evaluation of operator qualification and plant personnel training requirements

   d) development of test questions for operator examinations

   e) evaluation of normal, off-normal, and emergency operating procedures

   f) assessment of job performance aids

   g) evaluation of internal communication methods and systems

4. NRC will make available to INPO the job/task analysis data tapes containing the results of the NRC control room crew task analysis performed in 1982-83, additional data which may be collected by the NRC for control room crew task analysis, and other data which may be collected for other crafts and technicians associated with nuclear plant maintenance and operation.

5. Unless agreed otherwise, the data collected by INPO and the data collected by the NRC will be kept separated. Every effort will be made by both parties to protect the confidentiality of the data, the names of the nuclear power plants, and the personnel contributing to the data base, and to protect that information covered by the Privacy Act of 1974 (P.L. 93-579).

PERFORMANCE-BASED

TRAINING IMPLEMENTATION

Many INPO projects are designed to assist utilities in establishing and maintaining performance-based training systems. Several NRC activities will result in guidance for utilities to assist them in meeting training-related requirements. Both INPO and the NRC are basing their activities on variations of the Instructional Systems Development (ISD) model. It is recognized that the NRC, INPO, and nuclear utilities would benefit from the use of common methods, uniform terminology, and a common model for developing, implementing, and evaluating training. To facilitate this common approach, it is agreed that the following actions will be taken:

1. INPO will provide to the NRC copies of training and qualification guidelines and training-related good practices as they are published. This includes new documents and revised versions of existing documents.

2. INPO will develop a Training System Development (TSD) Manual to assist member utilities in implementing performance-based training. INPO will provide draft versions of the manual to the NRC for review and comment and will provide copies of the final manual to the NRC when it is published.

3. The NRC will consider INPO's TSD Manual in their training-related activities. The NRC will provide draft versions of related documents to INPO for review and comment.

ACCREDITATION OF TRAINING PROGRAMS

In accomplishing their training-related objectives, both NRC and INPO are involved in evaluating the quality of training provided to nuclear power plant personnel. INPO accomplishes this function through a combination of plant evaluations and the INPO Accreditation Program. (Coordination of INPO plant evaluation activities with associated NRC activities is in accordance with Appendix 2 to the Memorandum of Agreement.) The NRC evaluates utility training as part of its inspection program and through training audits. In order to minimize duplication of effort, the following elements of coordination are agreed upon:

1. INPO will keep the NRC informed of progress in achieving accreditation in the nuclear industry.

2. NRC will review various INPO Accreditation Program activities. To the extent that the accreditation program is proven to be effective, NRC will recognize efforts of INPO member utilities in achieving and maintaining accredited training programs.

3. The INPO Accrediting Board, which makes all decisions with respect to awarding or deferring accreditation and which reviews changes to criteria and procedures, will include one member recommended by the NRC. This board member will have full voting privileges and may be represented by an alternate (also recommended by NRC) when unable to attend board meetings. The NRC may have a representative observe Accrediting Board meetings.

4. NRC Review of INPO Activities

   a. Current copies of INPO accreditation criteria will be provided to NRC (Division of Human Factors Safety, Office of Nuclear Reactor Regulation).

   b. NRC may, on request, have a representative observe an INPO accreditation team visit. 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 will observe an INPO team visit several times annually. The NRC observer may be any person designated by NRC (Division of Human Factors Safety, Office of Nuclear Reactor Regulation). Where NRC Regional personnel are utilized as observers, they would not normally accompany an INPO team in their Region.

   c. INPO will brief personnel of the NRC Division of Human Factors Safety, Office of Nuclear Reactor Regulation,

periodically on all aspects of the INPO Accreditation Program. Again, while no specific intervals are considered necessary, briefings on about a quarterly basis are anticipated.

d. NRC review of INPO accreditation activities will be coordinated by the Divison of Human Factors Safety, Office of Nuclear Reactor Regulation.

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

JUN 2 2 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.

Carlyle Michelson

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

Enclosures:

8107090355
14 pp.

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

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-0578, 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.

SECTION 6

INPO/NSAC SEE-IN Program

SECTION 7

References

1. Ltr from C. Michelson to E. Wilkinson, INPO dated February 25, 1981 re: Memorandum of Agreement on a Cooperative Relationship for the Collection and Feedback of Operational Experience Information and Data for Nuclear Power Plants

2. Ltr from C. Michelson to E. Zebroski, NSAC dated February 25, 1981 re: Memorandum of Agreement on a Cooperative Relationship for the Collection and Feedback of Operational Experience Information and Data for Nuclear Power Plants

3. Ltr from E. Wilkinson, INPO, and E. Zebroski, NSAC, undated, re: Memorandum of Agreement Between INPO/NSAC and the U.S. NRC on a Cooperative Relationship for the Collection and Feedback of Operational Experience Information and Data for Nuclear Power Plants to William Dircks, NRC.

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ROUTING AND TRANSMITTAL SLIP

7/23/81

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. All AEOD Members		
2.		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

The attached charts are for your information. INPO has been informally requested to contact any member of AEOD directly should the need arise.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
	Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
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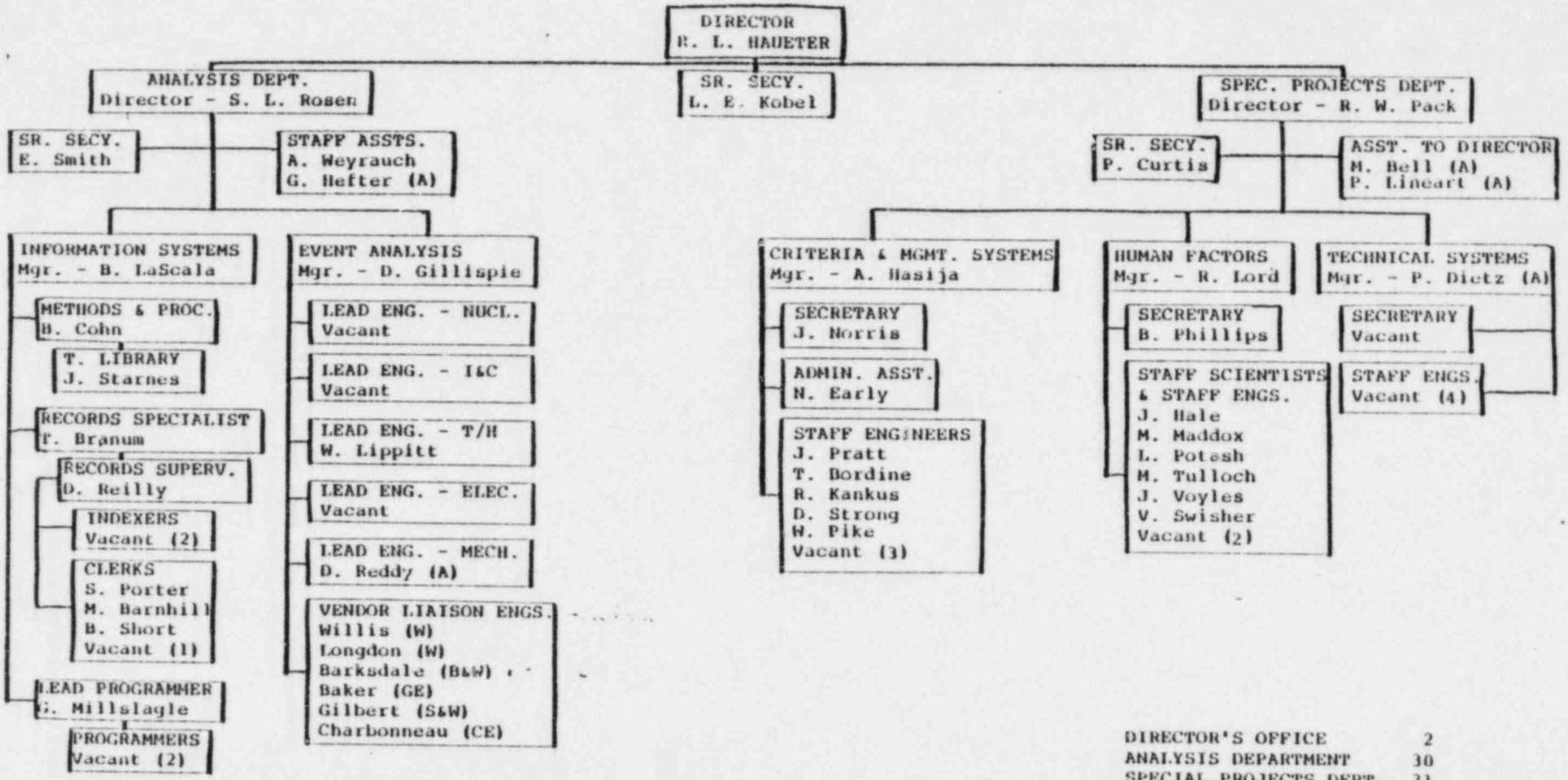
☆U.S.GPO:1978-0-261-647/3354

REVISED
5/14/81

ANALYSIS & SPECIAL PROJECTS DIVISION

ORGANIZATIONAL CHART



DIRECTOR'S OFFICE	2
ANALYSIS DEPARTMENT	30
SPECIAL PROJECTS DEPT.	31
	63

ANALYSIS DEPT.
DIR. - S. ROSEN

EVENT ANALYSIS
MGR. - D. GILLISPIE

- OPER. EXP. REVIEW
- SPECIAL EVENT EVALS.
- TREND ANALYSIS
- OPER. DATA SUMMARIES
- NSSS VENDOR & A/E LIAISON - FEEDBACK
- SYSTEMS DESIGN FEEDBACK

INFO. SYSTEMS
MGR. - B. LASCALA

- CORP. MGMT. SYSTEMS PLAN
- CORP. MGMT. SYSTEM OPER.
- INFO. MGMT. SERVICES
- DATA BASE ADMIN.
- COMPUTER FACILITIES
- TECHNICAL LIBRARY

MEMORANDUM OF AGREEMENT

INPO/NSAC-NRC

This memorandum between the Institute of Nuclear Power Operations (INPO), the Nuclear Safety Analysis Center (NSAC), and the U.S. Nuclear Regulatory Commission (NRC) reflects the desire for a continuing and cooperative relationship in the collection, and feedback of operational experience information and data for nuclear power plants. Mutual supportive activities, as defined below, will help assure that the goals and programs of INPO, NSAC, and the NRC will be carried out in the most efficient and effective manner without diminishing or interfering with the responsibilities or authorities of any party.

1. Collection of Operational Data

Since: (a) it is a common objective that reporting of information and data be efficient and duplicative reporting be eliminated; (b) the validity of analysis results may depend upon the completeness of input information; and (c) the effectiveness of operational data feedback is dependent upon a proper understanding of the implications inherent in reactor operating experience INPO, NSAC, and the NRC will endeavor to develop, maintain, and use a common database related to reactor operating experience. In this regard, NRC will consult with and, to the extent appropriate, factor in the recommendations and needs of responsible industry groups including INPO and NSAC in the process of requesting significant revisions to formal data bases such as the Licensee Event Report (LER) system, and the Nuclear Plant Reliability Data System (NPRDS).

Further, INPO, NSAC, and the NRC agree to consult with each other with regard to the availability of technical information which would be useful in ongoing plant event analysis and evaluation activities; and to promote and encourage a free flow of such information if not otherwise restricted from further distribution. This technical information will normally be in the realm of observable data describing plant parameters and occurrence sequences during an event which is under analysis. Both parties recognize the need for excluding from this agreement fragmentary information related to work in progress and information which has been received on a privileged basis. However, as such 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. 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.

2. Computerized Data Storage and Retrieval

In order to improve the overall operational data base in terms of completeness, accuracy, and ability to search and recall specific information, INPO, NSAC, and the NRC, will coordinate their efforts towards consolidation and improvement of NRC and industry-supported operational and engineering data bases.

3. Foreign Information

Information and data obtained by the NRC from foreign sources that does not include restrictions on further distribution, will be entered into a computerized databank; and will be readily available for INPO and NSAC analysis activities. Foreign information and data obtained by INPO and NSAC without restrictions will similarly be entered into the same computerized data base for ready access by NRC.

4. Significant Event Screening

INPO and NSAC will provide the NRC with timely listings of the significant events which have been identified by the SEE-IN screening process as significant events for action analysis. Similarly, the NRC will provide INPO and NSAC with the results of its significant event screening procedure which identifies events for engineering evaluation or case study.

5. Coordination Meetings

INPO, NSAC, and the NRC will meet semi-annually to discuss the major generic analyses and event evaluation activities underway and planned. The objectives of such coordination meetings are to provide up-to-date information on each organization's overall plans for the evaluation, analysis, and feedback of operational data, and the allocation of resources. This activity is an effort to avoid unnecessary and unintentional duplication of activities, while providing a means to identify those study areas where independent activities by another organization may be warranted. These coordination meetings are information exchange forums only. Formal requests or agreements on actions or revisions to programs are outside the scope of these meetings.

In addition to meetings, it is expected that frequent, informal communications will exist among the parties with regard to the nature and scope of studies in progress or planned.

6. Exchange of Analysis and Evaluation Results

The results of completed and formally documented generic analyses and event evaluation of operational data, together with the conclusions and recommendations where applicable, will be regularly exchanged between the parties on a timely basis. In addition, informal technical discussion of generic or event specific elements of studies in progress which are of mutual interest may be appropriate as determined on a case-by-case basis by the organization conducting the study.

5/26/81

William J. Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission

E. P. Wilkinson, President
Institute of Nuclear Power Operations

E. L. Zebroski, Director
Nuclear Safety Analysis Center

Effective Date: 6/1/81

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5/26/81

William J. Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission

E. P. Wilkinson, President
Institute of Nuclear Power Operations

E. L. Zaborski, Director
Nuclear Safety Analysis Center

Effective Data: 6/1/81

NRC/RES - INPO COORDINATION

PURPOSE

TO INCREASE THE NUMBER OF COOPERATIVE PROGRAMS BETWEEN NRC AND INPO. OBTAIN INPO REVIEW OF NRC RESEARCH PROJECTS RELATED TO INPO AREAS OF INTEREST.

NRC/RES - INPO COORDINATION

PLANS

1. INCREASE THE LEVEL OF COOPERATION ON PROGRAMS OF MUTUAL INTEREST OVER THE NEXT TWO YEARS.

2. REVIEW THE INPO PROGRAM OVER THE NEXT 60 DAYS AND REPORT ON AREAS FOR FUTURE COOPERATION. FORM WORKING GROUPS MUCH LIKE WE HAVE WITH EPRI. DEVELOP AGENDA FOR NEXT COORDINATION MEETING.

3. MEET WITH INPO 3 OR 4 TIMES A YEAR TO:

   A. BETTER UNDERSTAND INPO'S PROGRAMS.
   B. OBTAIN THEIR CRITIQUE OF OUR PROGRAMS AND COMMENT OTHERS.
   C. REVIEW PROGRESS ON COORDINATING PROGRAM PLANNING..
   D. RESOLVE DIFFERENCES.

NRC/RES - INPO COORDINATION

AREAS WHERE NRC NEEDS BETTER UNDERSTANDING OF INPO EFFORTS:

- IMPLEMENTATION OF THE RECENT ALARA MEMORANDUM OF UNDERSTANDING WITH THE NRC,
- EFFORTS TO EVALUATE MANAGEMENT ORGANIZATION AND EFFECTIVENESS,
- CORRELATING THE EVALUATION RESULTS TO SOME QUANTIFIABLE MEASURE OF IMPROVED SAFETY,
- THE SEQUENCING OF HUMAN FACTORS WORK, I.E., IN PARALLEL OR SERIES WITH THE DEVELOPMENT OF A TASK ANALYSIS DATA BASE, AND
- ONGOING OR PLANNED STANDARDIZED ANALYSIS OF THE NUCLEAR PLANT RELIABILITY DATA SYSTEMS (NPRDS) INFORMATION INCLUDING IMPLICATIONS FOR CHANGE IN IN-SERVICE INSPECTION FREQUENCIES BASED ON FAILURE DATA.

NRC/RES - INPO COORDINATION

SCHEDULES

- REVIEW INPO PROGRAM DURING NEXT 60 DAYS TO BETTER, UNDERSTAND THEIR PROGRAMS AND HOW THEY RELATE TO OURS.
- PLAN FOR NEXT INPO COORDINATIN MEETING WITHIN 30 DAYS OF THE PROGRAM REVIEW.
- HOLD PERIOD COORDINATION MEETINGS WITH INPO 3 OR 4 TIMES A YEAR.

NRC/RES - INPO COORDINATION

COMMITMENTS

- INPO WILL REVIEW THE PRECURSOR STUDY PERFORMED BY ORNL.
- COOPERATIVE PROGRAM ON TASK ANALYSIS.
- INVESTIGATE CONSOLIDATION OF PROGRAM PLANNING.