INTERIM ASSESSMENT OF REGIONAL IMPLEMENTATION OF IE PROGRAMS

JULY 1986 THROUGH DECEMBER 1986

REGION I

REGIONAL ASSESSMENT SUMMARY

REGION I

PROGRAM AREA	RATING
OPERATING REACTORS INSPECTION	O
CONSTRUCTION AND MODIFICATIONS INSPECTION	E
FUEL FACILITIES AND MATERIALS INSPECTION	E
EVENT REPORTING AND FOLLOWUP	E
EVENT FOLLOWUP AND GENERIC COMMUNICATIONS	E
EMERGENCY PREPAREDNESS	FS
INCIDENT RESPONSE	O
ENFORCEMENT	O
TECHNICAL TRAINING	O
QUALITY ASSURANCE	E
VENDOR PROGRAM INTERFACE	O
RESOURCE UTILIZATION	FS

OPERATING REACTORS INSPECTION ACTIVITIES

The region planned and supported the SALP and PAT effort at TMI-I very effectively during the period September to December 1986 and effectively supported special team and other inspection efforts in Region II and III. These efforts included integrating regional activities with the IE PAT inspection to meet a demanding Commission deadline for the SALP evaluation of TMI-1. The region effectively integrated the PAT inspection at TMI-1 into their master inspection schedule, thereby obtaining maximum inspection credit for IE efforts.

The region responded quickly and aggressively to the PAT TMI-1 findings, particularly at the SRI and section chief level. The Division of Reactor Safety responded quickly and aggressively to provide inspection support to problem facilities and others as well in Regions II and III. The region responded in a timely manner to IE requests for input to EDO controlled correspondence. Notification of IE of sensitive radiation protection problems concerning an improper sump room entry was not made in a timely manner; however, after discussions with the region, the notification and coordination had greatly improved.

A review of the information contained in the 766 system showed, on average, the region's inspection reports (all inspections) were issued 37 days after the inspection. This turnaround compared with the IE Manual goal of 20 calendar days for issuance of inspection reports with a 10 day extension for reports of major team inspections; this area needs improvement. The region's response to the situation at Hope Creek, events which subsequently led to an AIT, was not timely.

Some difficulties still appear to exist in the region's staffing of Appendix R team inspections. The region appeared to utilize its radiation protection resources effectively by meeting program requirements while still performing new initiatives. The region had shown good efforts in developing regional inspection guidance for inspections of a specific area. However, in one instance, the regional guidance with respect to credit for required inspections was found to be in conflict with headquarters guidelines. The regional had effectively participated in the Training Advisory Group activities, hosted couterpart meetings, and conducted inspector training. The region's resident inspector meeting appeared to be well planned with pertinent topics discussed based on the review of the meeting agenda.

The regional radiation protection staff identified the need to evaluate collocated TLDs and drafted a Temporary Instruction to accomplish this task. The safeguards staff took the initiative to develop and implement a program to test guard force training and the ability to respond to contingencies. The region has developed a videotape format for residents to introduce themselves and NRC during the licensee's GET program; this approach could prove very useful, particularly with respect to increasing the visibility of resident inspectors. The region has taken the initiative to prepare periodic reports on the status of activities for Pilgrim and TMI-1; these reports have proven to be very useful in keeping various groups informed of the status of these plants. The region, in conjunction with RES, held an NDE seminar in October 1986 that provided a useful exchange of information to strengthen regulatory activities (inspections) in that area. Region I continued its initiative to develop opportunities for strengthening the NRC inspection program through the incorporation of input based on PRA-related information.

The overall rating in this program area was outstanding.

CONSTRUCTION AND MODIFICATIONS INSPECTION ACTIVITIES

An assessment was made of inspection hours recorded in the 766 system as applied to the 2512 construction program at Limerick 2, which was restarted earlier this year and is now approximately 50% complete. The data shows approximately 2,600 hours applied to direct inspection between October 1975 and April 1986. Of that amount, 85 hours were expended between February 1984 and February 1986, specifically devoted to plant conditions associated with the extended delay in plant construction. Of 105 Priority I inspection procedures, inspection time had been applied against 49 procedures. This is generally consistent with the status of construction. Considering the two year extended delay in plant construction, it appears that the region has applied the 2512 construction inspection program at Limerick 2 in a reasonably balanced manner. The assessment did not indicate areas requiring additional regional review nor corrective action at this time.

A review was made of the use of the NDE van during the appraisal period. Use of the van appeared to be timely and effective. Also, at the request of Region I, IE furnished a fire protection specialist (contractor) to provide technical assistance during an Appendix R fire protection inspection at the R. E. Ginna plant. The region's utilization of the consultant was effective, and the actual cost was held below the estimated cost for the support.

The overall rating in this program area was excellent.

FUEL FACILITY AND MATERIALS INSPECTION ACTIVITIES

Region I had satisfactorily planned and organized its efforts for inspections, response to incidents, and special assignments. The region was the first to plan the TI 2600/1 effort. Consequently, the Region I model was used by other regions in planning for their efforts. Tasks assigned to Region I had been completed expeditiously and the region responded to incidents in a priority fashion. Written responses to licensees had been timely following routine materials inspections (usually within a week). However, reports following fuels inspections had been issued, on average, 54 days after the inspection (for FY-86) as compared to the 20 day standard; the maximum elapsed time was 96 days.

The region has a shortage of resources, yet it had used its available resources effectively to complete the inspection program. At times the regional inspectors had been on extended travel periods to recover and complete the materials program. Available fuel facility staffing had been used in licensing, decommissioning and special efforts such as monitoring of the West Valley project. The region had been cooperative with IE on any concern raised. Region I generally does not volunteer information of its own accord, however, the staff is always forthright when pressed on any issue.

The region had coordinated efforts well with IE; Region I had taken the initiative on tasks that were required without prodding by IE. However, the region should undertake more initiative in developing additional fuel facility inspection expertise in-house. The region operated in a team-oriented environment, an approach that stems from regional management. Regional inspectors have maintained an excellent level of expertise in their particular specialties and have taken on varied tasks as experience had been gained. Inspectors were not permitted to undertake tasks beyond their capabilities. The region had developed a good in-house training program; formal training had been emphasized, e.g., taking inspector related courses.

The overall rating in this program area was excellent.

EVENT REPORTING AND FOLLOWUP

A review of the region's Morning Reports for the months of September and October 1986 was performed; these were compared with the 10 CFR 50.72 notifications for the region for this period. This comparison indicated that the region was consistent with most other regions in the threshold used for daily reports. From the headquarters perspective, of those 50.72 notifications judged significant enough to warrant amplification, only one event was not reported. Thus, since last year's interim assessment, the region has improved in terms of threshold for daily report items. Regional event descriptions were consistently good and generally supplied significant information not available in the 50.72 description.

Excellent input and cooperation were obtained from the region during the review of the 1986 Abnormal Occurrence Report. The region actively participated in the bi-weekly conference calls for regional project directors. Region personnel were very cooperative regarding followup of the Peach Bottom diesel generator failure and in investigating licensee response to IE Information Notice 86-26; they were helpful and provided timely information regarding the RHR pump inspections at Pilgrim and were helpful in answering questions and assisting in developing an understanding of the Haddam Neck event. However, during NRR briefing preparation for the Hope Creek loss of power test, a headquarters staff member was denied access to the requested information. Information obtained elsewhere indicated that the event was more complicated than indicated in previous region descriptions. It was necessary for headquarters management involvement to obtain the information.

The region conducted the Hope Creek Augmented Inspection Team (AIT) effort from September 25 to October 10, 1986; this effort was somewhat delayed in starting. Significant interaction between headquarters and the region took place prior to the AIT.

The region provided outstanding support to the interoffice task group on performance indicators. The task group representatives contributed sound judgements and demonstrated initiative in developing the unplanned shutdowns and forced outage rate in an exemplary manner. The region gathered data for the trial program and reviewed data for the first report in a sound and timely manner despite tight schedules. Several data problems were discovered by the region due to a thorough review of information.

The overall rating in this program area was excellent.

EVENT FOLLOWUP AND GENERIC COMMUNICATIONS

The region was generally quite timely and cooperative in its response to headquarters requests for additional information pertaining to followup of 50.72 and daily report items. In particular, the region provided assistance with respect to the Calvert Cliffs reactor coolant pump seal, the Indian Point 2 safeguards diesel generator, and the Millstone reduced oxygen in inerted containments problems. The region met the due date regarding the survey of licensee implementation of INPO SOER recommendations (TI 2515/77). The region made a great deal of progress in performing inspections on TMI action items and updating the TMI tracking system. The overall rating in this program area was excellent.

EMERGENCY PREPAREDNESS ACTIVITIES

There was good management oversight and involvement in the EP program. Newly assigned inspectors required some on-the-job training which resulted in some unevenness in regional output, e.g., inspection reports and RAC reviews. However, the region is rebuilding into a strong EP program. The high quality of which the region is capable was evident at the Beaver Valley exercise exit meeting, where inspection objectives, open areas, improvement items and followup items were clearly presented, positive comments were presented and the licensee was provided an opportunity to discuss the various findings.

The region was generally responsive to requests for information from headquarters. In some cases (information for the Pilgrim exercise and site access), the response was prompt and complete. In others (exercise schedule updates, the identification of sites for the photo survey and information for the Calvert Cliffs exercise), the response was somewhat tardy; this may have been attributable to the experience of the individuals involved. Prompt and meaningful comments on the draft ERF inspection procedure were provided both orally and in writing. A complete and comprehensive review of MC 2500, Appendix I (guidance on the conduct of exercise inspection), and TI 2500/18 (FY-87 Inspection Program) was provided to headquarters in a timely manner.

The region utilized its resources in an effective manner regarding the performance of routine inspections and observation of EP exercises. Contractor support was utilized in a manner consistent with established guidelines, especially in the assignment of resident inspectors as observers/evaluators at emergency preparedness exercises.

Regional coordination with headquarters in the EP area was variable. The region generally provided timely information and response to headquarters; however, a meeting regarding Seabrook emergency preparedness was arranged without the involvement or notification of headquarters. The working relationship between the region and the FEMA regions appears to require additional management attention to insure more prompt resolution of outstanding EP deficiencies identified by FEMA.

The region displayed initiative in adjusting to the reduced contractor support for exercise and routine EP inspection efforts. In view of their concerns regarding EP at Salem/Hope Creek, the region elected to send the region's site response team, including the Regional Administrator, to the annual exercise. The region demonstrated good problem solving ability. The especially difficult problems involving the Indian Point 2.206 petition were addressed and a resultant summary of the key issues was developed. Due to a heavy workload and reduced EP staff, the region was not able to participate in the headquarters workshop to revise and streamline the Basic EP inspection procedures.

The overall rating in this program area was fully successful.

INCIDENT RESPONSE ACTIVITIES

The region exhibited good planning and organizing in preparation for the Hope Creek Exercise in November. The region planned and conducted a Federal Capabilities Conference and early responders workshop for federal, State and local emergency response personnel in the Region I area.

Regional staff provided input in a timely fashion for items on training used in the development of the formal assessment program for 1986/1987. Some of the coordination with licensees required for ERDS visits was delayed due to administrative complications that were resolved with little adverse impact. Response to the hurricane policy memorandum was provided in a prompt and efficient manner.

The region's reporting of staff resources expended is in line with Agency objectives. The region participated in and actively contributed to discussions and program development in ERC Workshop #12 held in Region III and routinely participated in monthly conference calls. The ERC developed a presentation for the workshop on response training that will be utilized to develop a standardized approach to training to be used by all regions. The regional ERC's contribution to Headquarters work on training manuals was useful and constructive. Communication with Headquarters on routine regional business regarding incident response was forthcoming and beneficial.

The region showed initiative in suggesting Headquarters participation in training for their RDOs to gain a better understanding of regional/Headquarters interaction in emergencies. The region requested Headquarters assistance in development of the regional supplement; this is the preferred manner for conducting business indicative of a positive working relationship. The regional ERC made a concerted effort to brief Headquarters staff on training ideas that could be utilized in developing a standardized approach to emergency response training while in Headquarters on other business. The ERC participated as an observer in the Palisades exercise to develop safeguards team procedures in event response.

The overall rating in this program area was outstanding.

ENFORCEMENT ACTIVITIES

The Enforcement Staff (ES) had assessed regional enforcement actions submitted to IE for concurrence or for issuance between July 1 and December 15, 1986 that were not included in a prior assessment period. A random review of routine enforcement actions that were not submitted to IE for concurrence because they did not involve escalated enforcement action was also performed. The cases submitted for IE concurrence were evaluated on the basis of technical adequacy, conformance to established policy, guidance, and precedents, and timeliness. The assessment included an evaluation of the overall quality of packages with regard to the above-described factors and an evaluation of regional cooperation in the enforcement process. Routine enforcement actions involving reactor operations that were not submitted to IE for concurrence were evaluated on the basis of conformance with the enforcement policy, guidance, and precedents.

The cases reviewed for this assessment were:

REACTORS

* 86-059 - Peach Bottom
86-130 - Yankee Rowe
* 86-135 - Nine Mile Point
86-152 - Salem
86-167 - Haddam Neck

MATERIALS, SAFEGUARDS AND HEALTH PHYSICS

86-115 - Power Authority of New York - Indian Point
86-116 - Thomas Jefferson Hospital
86-117 - Haddam Neck/Millstone
* 86-123 - Pittsburgh Testing Laboratory
86-149 - Schletter and Stock
86-168 - Gamma Diagnostic Laboratories
86-170 - Lehigh Testing Laboratories
86-180 - Massachusetts General Hospital
86-181 - Henry Heywood Hospital
86-182 - Amersham Corporation

During the assessment period, Region I submitted for IE concurrence very high quality enforcement packages that demonstrated an excellent ability to analyze facts for the appropriate application of the enforcement policy. The packages were technically accurate and substantially conformed with the format of established policy, guidance, and precedents.

Few revisions or only minor changes were required in most of the packages submitted. However, in one case, Nine Mile Point (EA 86-132), several revisions were required for circumstances that should have been considered by the region.

Transmittal memoranda provided excellent explanations of the facts and the rationale for the proposed actions. Enforcement packages clearly described the application of the Enforcement Policy that reflected the regional position. The Enforcement Coordinator did an outstanding job in preparing packages sent to IE for concurrence, and was very knowledgeable of the facts involved in each case. It is noted that more attention could be devoted to standard terminology and format described in Chapter 0400 of the Inspection and Enforcement Manual. Overall, the regional staff is extremely cooperative in working with IE in resolving controversial issues and in exercising good judgment.

A review of approximately 15 routine inspection reports involving Severity Level IV and V violations issued by Region I showed that the violations were technically accurate and supported by the facts described in the inspection report. The

*/ Reviewed for content only. Timeliness was not evaluated because case involved a civil penalty imposition or a special circumstance.

actions generally conformed with the enforcement policy, guidance, and precedents, and the cover letter to the licensee was usually used to provide the NRC perspective on the significance of the violations. However, Inspection Report 50-387/86-14 (Susquehanna) describes circumstances where the licensee did not recognize a containment isolation technical specification violation existed when a Traversing Incore Probe (TIP) drive control unit was deenergized with the probe inserted into the containment. A Severity Level IV violation was given for this event; however, the event could have been considered more significant because (1) the licensee failed to recognize that a containment isolation violation occurred when the TIP was deenergized and could not be withdrawn automatically on an isolation signal, (2) an Operating Procedure was violated when the TIP was deenergized inside the containment, (3) the licensee had prior notice of this problem with the TIP because of vendor recommendations against leaving the TIP inside the containment, and (4) this problem had occurred previously. In addition, the practice of leaving the TIP inside the containment is contrary to FSAR commitments. Therefore, in accordance with the guidance provided to the regions, this case should have at least been submitted to IE for concurrence prior to its issuance.

It is also noted that on March 30, 1986, at the Salem Generating Station, a reactor vessel entry event occurred that demonstrated a lack of understanding of the radiological hazards associated with the entry, a lack of communication between work groups, and a failure to follow procedures. Previous notices have been sent to licensees regarding these types of entries, and escalated enforcement has usually resulted. Although a similar event occurred at Salem in 1980, no enforcement action was taken by the region for this March 30, 1986 event. Escalated enforcement should be considered by the region in the future for improper entries into this type of environment.

The Commission's established goal of issuance of escalated enforcement actions within an average of 8 weeks from identification of a violation means the regional office must submit a completed proposed package to IE for concurrence within 6 weeks. The average time for the Region for submittal of escalated enforcement action was 6.9 weeks.

The overall rating in this program area was outstanding.

TECHNICAL TRAINING

The region has contributed significantly to specialized technical training. A senior regional manager had served as a SEP member on two major training procurements and was routinely available as a consultant. Another regional staff member serves on the SEP for a pending procurement. The region was very responsive in developing and revising material for the Fundamentals of Inspection Course (FOIC) manual. The region also validated much of the FOIC material during courses given in the region. The overall rating in this program area was outstanding.

QUALITY ASSURANCE

The region has been consistently responsive to the QA initiatives proposed by HQ. The region has cooperated with and helped coordinate the QA Counterpart meetings. The region has shown very good initiative regarding implementation of the QA Temporary Instruction. The overall rating in this program area was excellent.

VENDOR PROGRAM INTERFACE

Region I has been very supportive of the vendor program by providing information on check valve failures during the SONGS check valve failure effort as well as by providing an expert on valves to assist with the SONGS inspection. Region I resident inspectors have called to provide information on vendor related problems and have assisted the Vendor Program Branch in accomplishing inspections at several plants in the region.

Regional staff cooperated with on a number of EQ inspections and the Yankee Atomic inspection to review the engineering support of Maine Yankee relative to modifications. The region cooperated during visits by Vendor Branch personnel on the check valve and differential pressure switch problems.

The overall rating in this program area was outstanding.

RESOURCE UTILIZATION

Region I exceeded budgeted direct inspection hours for reactors by 6% in FY-86; this was above the national average. Direct inspection hours expended for fuel facilities were significantly under budget, while expended hours for other IE programs were held within the budgeted level. Inspector staffing had been maintained at or above 100%; in addition, FY-87 staffing has been on target. Program support funds were fully obligated in FY-86. Although Region I achieved the overall budgeted level for the IE program as a whole, the percent achieved was below the national average; this represents a downward trend from mid-year FY-86. Summary resource utilization statistics are given below:

RESOURCE UTILIZATION STATISTICS

PERCENT OF BUDGET ACHIEVED

	FY-86	
RESOURCE	MID	EOY
Reactors	108	106
Fuel and Materials	81	87
Other IE	91	86
Overall Direct Inspection	103	101
Staffing (Average)	102	100
Program Support Obligated	55	100

The overall rating in resource utilization was fully successful.