

From: "Michael Mulligan" <m.mulligan@worldnet.att.net>
To: "Victor Dricks" <VLD@nrc.gov>, "Raymond shadis" <s...
Date: 9/2/98 3:16pm
Subject: Vermont Yankee; Engineering Safety Concern.

Mr. Dricks

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ENCLOSURE 1

Evaluating Reactor Licensees

As part of its mission to protect public health and safety and the environment, the Nuclear Regulatory Commission (NRC) monitors and evaluates the safety performance of licensees who operate more than 100 commercial nuclear plants in the United States. This rigorous oversight includes evaluating safety concerns, assessing operational events and experience, and reviewing enforcement actions. All NRC evaluations and actions are based on publicly available information.

The process used to determine the level of plant safety is comprehensive to ensure NRC has an accurate and objective understanding. It involves a number of NRC programs that continually examine plant operations, operational events and plant management. Two programs--inspections and analysis of operational data--provide primary information that is used in other evaluations by the NRC's staff. About once every six months, NRC senior managers meet with the Commission to discuss the performance of nuclear power plants based on the staff's evaluations. These meetings are held at NRC's headquarters in Rockville, Maryland, and are open to the public.

INSPECTION PROGRAM

NRC resident inspectors assigned to specific plant sites, augmented by specialists from headquarters and regional offices, conduct year-round inspections of licensee activities. Inspections are planned and performed both routinely and in response to events, enforcement, allegations or emerging issues. Inspection findings and conclusions are documented in reports, which are reviewed and approved by the inspectors' managers. These reports and associated findings are available for review and analysis by all NRC offices and by the public.

ANALYSIS OF OPERATIONAL DATA PROGRAM

In addition to the day-to-day and special inspections, mechanical, electrical and other plant problems are carefully analyzed by the NRC. Reviews are conducted by the Office of Nuclear Reactor Regulation (NRR), which has primary responsibility for oversight of the inspection program for nuclear plants, and the Office for Analysis and Evaluation of Operational Data (AEOD).

The NRR reviews reports from licensees, NRC inspectors and industry groups to assess their safety importance, generic implications and the need for any immediate corrective action. AEOD screens individual plant events or incidents to identify forerunners to potential severe accidents. In addition, AEOD conducts an analysis of plant operating experience as reflected in eight performance indicators (PI). These indicators include data on unplanned automatic reactor shutdowns, equipment and safety system failures and worker radiation exposures. AEOD's findings are published in a report that highlights trends in safety performance--both good and poor.

Stemming from these two programs are other evaluative processes, described below, that NRC uses to assess plant performance. These vary in scope, frequency, level of review and duration.

Plant Performance Reviews

At least semi-annually, NRC staff in each of four regional offices bring together the findings of NRC inspectors, AEOD analyses and enforcement actions (i.e., penalties for licensee violations of NRC regulations) to give NRC senior managers a look at how licensees have performed over the previous six months. These assessments, called plant performance reviews (PPRs), help managers decide which plants require additional close attention for the next six months. These periodic reviews also are a primary source of information in assessing plant performance for the semi-annual Senior Management Meetings. The results of PPRs are made public.

Integrated Performance Assessment Process (IPAP)

Independent of day-to-day oversight of nuclear plants by the resident inspectors, teams of senior NRC

inspectors conduct integrated performance assessments at selected plants each year. The purpose is to verify that a licensee's actual performance matches the performance reflected in written records for the previous two years. Findings from the IPAP provide direct input to the Systematic Assessment of Licensee Performance (SALP) program that is described below. An IPAP report with final conclusions include recommendations for future plant inspections and is made available to the public.

SALPs

The SALP evaluations employed by the NRC are conducted every 12 to 24 months to assess long-term performance of each nuclear power plant. The staff review includes the use of boards comprised of two managers from a regional office and a manager from NRR. The board members review inspection results, enforcement actions that may have been taken against a licensee, and results of the latest PPRs, IPAPs, performance indicators, licensee self-assessments, third-party assessments and in-depth discussions with licensees. Typically, the board also visits the facility for a first-hand assessment. The result of the SALP review is a report that assigns one of three ratings to a plant: 1 for superior performance, 2 for good performance and 3 for acceptable performance. The ratings focus on four functional areas: (1) plant operations, (2) maintenance, (3) engineering and (4) plant support. Regional managers use the SALP findings to identify those areas at a plant that require increased inspection. Generally, a plant receives a SALP review every 12-18 months. Plants whose performance is rated superior may have the period extended to 24 months before another SALP is performed. All SALP reports are made available to the public.

Senior Management Meetings

About two months before the semiannual Senior Management Meeting (SMM), the four regional administrators and the Director of NRR discuss at a screening meeting the numerous staff assessments and inspection results for each plant nationwide. Results of PPRs, performance indicators, inspection findings and SALPs are considered at these meetings. If a plant's performance appears to be declining significantly, or if there are significant concerns about its performance, it will be placed on the agenda for discussion at the SMM.

The SMMs are chaired by the NRC's Executive Director for Operations and include all regional administrators, office directors and senior managers. To arrive at an objective evaluation of a plant's operational safety performance, the managers use a standard set of questions in five areas: 1) effectiveness of licensee self-assessment, 2) operational performance (frequency of abnormal events), 3) human performance, 4) material condition (safety system reliability/availability) and 5) engineering and design. With this template of questions guiding discussions, the managers identify those plants whose performance is of most concern and warrant increased NRC attention. These plants are placed on NRC's "Watch List." Plants already on the Watch List that have demonstrated improved performance over an extended period may be taken off the list. Plants that have demonstrated superior performance are also identified.

The Watch List has three categories:

- 1) Plants removed from the list;
- 2) Plants authorized to operate that NRC will monitor most closely; and
- 3) Shutdown plants requiring NRC authorization to resume operations and which NRC will monitor closely.

After the Senior Management Meeting, the safety performance of plants that are placed on or taken off the Watch List are discussed at the semi-annual public meetings with the Commission, generally during summer and winter timeframes. Also discussed are those plants whose performance is trending downward.

The NRC notifies the chief executive officers of the utilities operating those plants of concern to the

agency and indicates the need to correct weaknesses. Those having plants removed from the list and those which have demonstrated superior performance are also notified.

July 1996

Send Comments or Questions to opa@nrc.gov

FROM: ORIGINAL DUE DT: / / TICKET NO: 0980187
DOC DT: 09/02/98
NRR RCVD DATE: 09/04/98

TO:

Victor Dricks

FOR SIGNATURE OF : ** YEL **

DESC:

Vermont Yankee; Engineering Safety Concern

ROUTING:

Collins/Miraglia
Boger
Sheron
Roe
Zimmerman
NRR Mailroom

ASSIGNED TO:

DRPE

CONTACT:

Zwolinski

SPECIAL INSTRUCTIONS OR REMARKS:

For appropriate action

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