

Industry Feedback on Inspection Experience During COVID-19 Public Health Emergency

Following are observations on remote inspections shared with NRC during the ROP public call on June 24, 2020.

- **Top Thoughts:**
 - NRC and licensees both functioned well in the transition to pandemic conditions, and both maintained a proper emphasis on safety and oversight of the plants and the health and safety of plant and NRC personnel.
 - The NRC's initial postponement of scheduled inspections early in the pandemic response was valuable in allowing sites to grapple with this new phenomenon and adjust or develop additional remote capabilities and personnel health protection practices. As we understood the situation better and learned about the virus, we were able to work with the NRC to restart inspections, factoring in the new normal and ensuring the NRC could do its job safely and effectively.
 - The initial high frequency of virtual public meetings (i.e., conference calls and webinars) held by the NRC early in the pandemic response helped to share perspectives and experiences and adapt to the emerging conditions of the pandemic. We believe these also helped keep the public informed.
 - We commend the NRC staff and management for adapting so quickly to these new conditions.
 - We hope that the NRC will take what we've learned from the pandemic response and incorporate it into the inspection program as we go forward.
- **Thinking Differently** - The public health emergency (PHE) compelled us to think differently about our work and the NRC's.
 - **Social distancing...**required us to rethink how our people interact with each other onsite and off, and interact with NRC personnel and the value of those interactions compared to the health risks with COVID.
 - **Working remotely...**required us to think creatively about ways to communicate and share information using technology instead of paper and physical presence.
 - **Personal protection...**required us to reassess what matters most: the health and safety of our workers, our contractors, our families, and our communities, and the interconnections among them all.
- **Learning Opportunity** – The PHE has been a tremendous learning opportunity for our industry. The lessons we have learned from this experience are making the industry safer and more productive.
 - Industry shared experiences and best practices to ensure that every licensee had access to the best available information on COVID conditions and impacts around the fleet, how to control its spread, and how each licensee responded the impacts.
- **Remote Inspections** – Experience with remote inspections has been very positive for the industry.
 - We were able to help resident inspectors access critical plant information remotely, so they could monitor the plant and access CAP, logs and other plant data as they would from their onsite offices.

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- We noted that inspectors working remotely needed additional help getting answers to questions they would previously have pursued on their own while onsite.
 - Many sites found it helpful to pro-actively contact remote inspectors multiple times per day, to ensure that information needed by the NRC was flowing as it should. Under pre-COVID conditions, such check-ins with inspectors onsite would happen naturally as plant staff and inspectors move about the plant in the normal course of business.
 - We noted that the tempo of inspector requests continued at a high level during the “offsite” middle week of three-week team inspections. Before the COVID restrictions, the “offsite” week usually brought a noticeable reduction in interactions with the inspection team while they worked back in the regional office.
 - We believe that having inspectors work remotely alleviated the stress and cost of their travels to our sites, eliminated time they would have spent in-processing and getting oriented at our sites, and potentially made their time on our inspections more efficient.
 - We observed a variety of outcomes for inspections that required walkdowns or other field work. Some of those samples have been postponed and the inspections held open pending completion of those in-field samples. We are eager for these open inspections to be completed as soon as practical. In other cases, residents were able to complete the field work or other creative approaches enabled timely completion.
 - We do not yet know how the labor hours and costs of remote inspections will compare to expectations for those inspections performed in person in the past. We are eager to see this comparison of CY2020 Actuals to Planned.
 - We believe the positive experience with remote inspections during the pandemic shows how effective they can be in performing the baseline inspection program. We urge the NRC to adopt this practice as much as practical as we go forward.
- **Other Lessons**
 - Exemptions approved this past spring were supported with a nuclear safety analysis that showed no or minimal impact on safety. Industry requested the exemptions only where needed, e.g., Work Hour Rule.
 - All of these and other changes are being evaluated as part of doing business in the future. NEI has published for industry a pandemic guideline that is a living document and will be updated as we learn more. There are many other outage management and technical lessons learned specific to tasks that are being shared across the industry.
 - COVID was an emergent issue in the Spring. COVID response is not as much of a crisis for the Fall outage season since appropriate planning can be done. Thus, we will be able to implement many of our lessons learned. However, it is still a challenge to predict what the COVID situation will be in the Fall and appropriate planning based on known conditions will include contingencies and various relief requests to ensure safe and successful execution of Fall outages.
 - None of us see a scenario in which the virus will not be a threat to the health and safety of the public and our employees, unless there is a radical new development to alleviate the situation, such as a vaccine. Without a vaccine, granting of temporary exemptions, with the appropriate safety basis, may be important to protect the health and safety of our employees and the public.

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- We are planning now for the Fall and with the best available knowledge today, we are planning for a season with no vaccine and potentially new COVID-19 hot spots.
- There will likely be fewer requests for relief as lesson learned are applied, but there will be a few key requests that the industry has tried to mitigate but have not found a solution, e.g., SG and BMI, where the technology and staffing for these have already been optimized previously and further advances take years to develop and implement.
- Predictability is also very important to the industry. Contracts for outages must be firmed up months in advance such that they can be integrated into our outage safety plans. The industry has learned that the sooner the plans are locked down the better the site is able to do effective outage planning that optimizes the safety plan and can practice and plan for contingencies.
- Its therefore important the NRC continue to provide approvals in a timely manner as it has done for the Spring outages. Outage planning is being finalized so stations cannot wait to see what the local COVID situation will be in the Fall, which can change rapidly as we are seeing in some parts of the country.
- On non-outage activities, the NRC continued to function well and provided oversight to give the public confidence in health and safety.

Thank you for this opportunity to provide feedback on our interactions with the NRC during this pandemic.

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