

January 29, 1998

Ms. Danielle Brian, Executive Director  
Project on Government Oversight  
1900 L Street, NW, Suite 314  
Washington, DC 20036-5027

SUBJECT: MANAGEMENT OF SAFETY ISSUES

Dear Ms. Brian:

I am responding to your letter of December 2, 1997, to Chairman Jackson of the Nuclear Regulatory Commission (NRC) concerning the management of safety issues and the maintenance of tracking systems. In your letter, you asked about NRC's current progress in the management of safety issues. Reports on the status of generic safety issues were previously sent to Project on Government Oversight (POGO) in a March 29, 1996, letter from Frank P. Gillespie to Scott Amey. An update to those reports is enclosed in this letter. Please note that, as with the reports sent earlier, the summary is generated from a working file and that no overall quality check has been made for issues that have open items. Issues that are statused as 100% complete have undergone a quality assurance process to ensure proper closeout. Also, the staff has enclosed a description of the process for managing generic safety issues and a response to the recommendations in your December 2, 1997, letter.

Your concern about this important area of regulation is appreciated. I have designated Joseph Birmingham of my staff as the contact for this letter. He may be reached at 301-415-2829.

Sincerely,

Original signed by  
Samuel J. Collins

Samuel J. Collins, Director  
Office of Nuclear Reactor Regulation

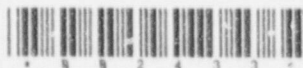
Enclosures: As stated

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NAME	JBirmingham:sw	FAkstulewicz	TEssig <i>[Signature]</i>	JRoe <i>[Signature]</i>	SCollins <i>[Signature]</i>
DATE	01/26/98	01/28/98	01/28/98	01/28/98	01/29/98

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 29, 1998

Ms. Danielle Brian, Executive Director  
Project on Government Oversight  
1900 L Street, NW, Suite 314  
Washington, DC 20036-5027

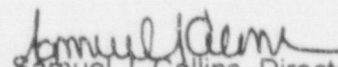
SUBJECT: MANAGEMENT OF SAFETY ISSUES

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Your concern about this important area of regulation is appreciated. I have designated Joseph Birmingham of my staff as the contact for this letter. He may be reached at 301-415-2829.

Sincerely,

  
Samuel J. Collins, Director  
Office of Nuclear Reactor Regulation

Enclosures: As stated

**Summary of the Status of Safety Issues**  
(From the Safety Issues Management System, January 23, 1998)

The status of the four types of generic safety issues tracked by the NRC staff is provided below:

**Unresolved Safety Issue (USI)**

There were seven USIs with either open plant implementation or verification fields. Most of the USIs were open to track Browns Ferry (BF), except for USI A-46, "Seismic Qualification of Equipment in Operating Plants," which is tracking 58 plants as not implemented and 65 plants as not verified.

**Three Mile Island Issue (TMI)**

There were 15 TMI issues identified as not implemented and 10 TMI issues identified as not verified. These were all for BF-Unit 1 except for issue III. d.3.4.3, "Control Room Habitability-Implement Modifications," which also included Millstone-1, and Zion-1 and -2.

**Generic Safety Issue (GSI)**

There were 9 GSIs (13 plants) identified as not implemented and 5 GSIs (18 plants) identified as not verified.

**Multiplant Actions (MPA)**

There were 26 MPAs identified as not yet implemented by all plants and 8 MPAs identified as not verified (18 of the not implemented MPAs have been verified or did not require verification). Of the 26 MPAs identified as not yet implemented 15 were open for only 1 plant. The more recently initiated MPAs had a much higher number of plants identified as not implemented, e.g., the MPA for Bulletin 96-02 had 100 plants identified as not yet implemented.

The staff notes that the number of safety issues identified in SIMS as not yet implemented and the number of safety issues identified as not yet verified has been reduced since the response to POGO in March 1996. This is particularly noticeable in the reduced number of plants not yet verified. The staff is looking into means to make the entry of completed temporary inspections a more timely update of the SIMS database.



## NRC Process for Management of Generic Safety Issues

Several types of generic safety issues are managed by the NRC: (1) issues identified as Generic Safety Issues (GSIs) that have been formally transmitted to the Office of Nuclear Regulatory Research (RES) for prioritization and technical resolution, (2) unresolved safety issues (USIs) that have also been sent to RES for prioritization and technical resolution, (3) issues that arose from the accident at Three Mile Island Nuclear Station in 1979 (TMI items), and (4) generic safety issues discussed in NRC generic communications that require certain licensees to provide a response or to perform actions. These types of generic issues are tracked as multi-plant actions (MPAs). Other generic activities that arise from the staff's review of safety data are identified as generic communication and compliance activities (GCCAs).

On December 19, 1995, the staff of the Nuclear Regulatory Commission (NRC) briefed the Commission on mechanisms for addressing generic safety issues. After this briefing, the Commission issued a staff requirements memorandum (SRM) on January 19, 1996, that directed the staff to ensure that each NRC office understood its role pertaining to generic safety issues. The SRM also stated that there should be one agency-wide generic issue tracking system. The staff has developed an integrated process for managing generic safety issues that has improved the overall timeliness for identification and resolution of generic safety issues. The staff plans to improve the manner in which verification of licensee actions is entered into the data management systems.

The systems for managing generic or potentially generic safety issues are described below:

### The Events Tracking System (ETS)

ETS is a data system used to track events of potential safety significance identified during NRC's organized review of incoming safety data. Evaluation of some issues tracked in ETS may determine that a generic communication is required and result in an MPA being developed. A few issues may be sent to RES for evaluation as potential GSIs.

### The Workload Information and Scheduling Program (WISP)

WISP is a data system used to organize, schedule, and audit the progress of work within the Office of Nuclear Reactor Regulation (NRR). Individual work tasks within NRR are tracked by technical assignment control (TAC) numbers. MPAs are assigned a TAC number and are tracked in WISP.

### The Regulatory Information Tracking System (RITS)

RITS is a data system that documents staff hours and the status of all actions within NRR. RITS receives input from several subsystems and interfaces with WISP. The TAC system is a subsystem within RITS.

#### The Safety Issues Management System (SIMS)

SIMS is a data system used to collect, track, and retain generic and plant-specific data on various safety or regulatory issues. GSIs, USIs, TMI items, and MPAs are tracked in SIMS. SIMS is automatically updated from WISP for issues with TAC numbers. If no TAC number exists, SIMS is updated by the NRR SIMS Coordinator. NRR Office Letter 501, "Procedures for Generic Safety Issues and Unresolved Safety Issues," and the related users' manual, "Safety Issues Management System (SIMS)," provide policies and procedures for using and updating information related to GSIs and USIs in SIMS.

#### The Generic Issue Management Control System (GIMCS)

GIMCS is a data system used by RES to issue quarterly reports on the status of GSIs and other generic issues tracked in SIMS.

#### NUREG-0933, "A Prioritization of Generic Safety Issues"

NUREG-0933 is a periodic report on the status of GSIs, USIs, and other types of generic issues. NUREG-0933 also lists closed GCCAs. NUREG-0933 is issued approximately every 6 months.

The above data systems and reports are tools for tracking and publishing the status of identified generic safety issues.

The process for review of incoming safety data to identify safety issues is described in NRC Management Directive 8.5, "Operational Safety Data Review," NRR Office Letter 503, "Procedure for Integrated Identification, Evaluation, Prioritization, Management, and Resolution of Generic Issues." These procedures prescribe the data to be reviewed, the process for review and assessment of the data, and the means for documenting initial and final regulatory actions including issuance of generic communications. For generic communications requiring licensees to respond or to take actions, a determination is made by the staff for the need to track the implementation and verification of those responses or actions by an MPA. MPAs are tracked in the WISP and SIMS data systems.

NRR Office Letter 303, "NRR Office Workload Procedures Manual," prescribes the process by which identified generic safety issues, including MPAs, are entered into WISP, RITS, and SIMS and updated. The procedure describes the process by which project managers, technical staff, and region based inspectors document their actions, including the review of licensee responses and the verification of licensee actions. As the elements of an MPA are completed, the information is entered into WISP or RITS. In general, updating the fields in WISP and RITS automatically updates the corresponding field in SIMS. An exception is the closeout of temporary inspections (TIs) which are entered separately from WISP or RITS. The staff is looking into a method to make updates in SIMS for closed TIs more automatic.

As an integrated system, the processes for management of safety issues promote the positive tracking of generic safety issues from the point of identification to the point of closure.



### Comments on POGO Recommendations

The following information pertains to the recommendations in your letter.

1. Update databases detailing the status of safety issues at nuclear power plants.

The staff has placed increased emphasis on timely updates of the databases that detail safety issue status. As a result, the number of safety issues identified as not yet implemented and the number of safety issues not yet verified by the NRC has been reduced. The staff intends to continue this emphasis on timely updates and as a consequence expects the databases to more accurately reflect the status of safety issues. A summary of the status of the various generic safety issues is provided in this enclosure.

2. Create time limits for plants to implement NRC resolutions for safety issues. Impose penalties if these time limits are not adhered to.

When NRC issues a generic communication requesting licensees to respond or to take actions regarding a safety issue, a time period for the response is usually specified. Because of the differences in design and operation of plants, licensees are generally requested to propose a schedule within which any requested actions will be implemented. Additionally, licensees may propose alternative actions that are more suitable to the operation and configuration of their plant. As appropriate, these alternative proposals are reviewed by the project and technical staff for acceptability. The NRC may, in accordance with NRC procedures, impose penalties for licensees that fail to comply with NRC requirements.

3. Require NRC verification of implemented licensee actions within a reasonable time.

The NRC verifications of licensee actions for generic safety issues are implemented in an expeditious manner consistent with the need for inspection and the safety significance of the issue. This is accomplished by incorporating inspections to verify licensee actions into the Master Inspection Plan for each region so that verifications are implemented consistent with the availability of the item to be inspected, the urgency for the inspection, and the availability of NRC resources. Because past updates of the SIMS database for completed verifications have not been timely, the staff is working to make updates to the SIMS database more automatic.

*Mike Doyle*  
*MRAS*

# ACTION

EDO Principal Correspondence Control

*Recd. 12/12*  
*assigned to*  
*Easig.*

FROM:

DUE: 12/22/97

EDO CONTROL: G970854

DOC DT: 12/02/97

FINAL REPLY:

Danielle Brian  
Project on Government Oversight

*Requested back*  
*extension*

TO:

Chairman Jackson

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO: 97-1168

Collins, NRR

DESC:

SAFETY ISSUES AT NUCLEAR REACTORS

ROUTING:

Callan  
Thadani  
Thompson  
Norry  
Blaha  
Burns  
Lieberman, OE  
Merschhoff, RIV

DATE: 12/11/97

ASSIGNED TO:

CONTACT:

NRR

Collins

SPECIAL INSTRUCTIONS OR REMARKS:

Put EDO and Chairman on for concurrence.  
Chairman's office to review response prior to  
dispatch.

Ref. G970596.

NRR RECEIVED:

DECEMBER 12, 1997

NRR ACTION:

DRPM:ROE

NRR ROUTING:

COLLINS  
MIRAGLIA  
ZIMMERMAN  
SHERON  
TRAVERS  
BOHRER

ACTION

DUE TO NRR DIRECTOR'S OFFICE

BY Rec. 12/19/97

*Extension granted - 1/28/98*

*- need quick letter - 12/29/97*



# POGO

Project On Government Oversight  
Watchdog since 1981

11246

December 2, 1997

The Honorable Shirley A. Jackson  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Chair Jackson:

The Project On Government Oversight (POGO) is informing the local media and the public, in the areas surrounding nuclear reactors, about unimplemented and unverified "high priority" safety issues. As we discussed in our February 11, 1997 meeting with you, "high priority" safety issues go unfixed for nearly twenty years before, if ever, being fixed.

On August 12, 1997, POGO sent you an update of our 1996 report, "Who The Hell Is Regulating Whom?" The NRC's Abdication Of Responsibility. Our update documented the Nuclear Regulatory Commission's (NRC) lack of progress in fixing these safety deficiencies.

However, a recent comment made by Breck Henderson, an NRC spokesperson in Arlington, Texas, heightens our concern about this lack of process. The article in which he made this comment is attached. NRC databases detail the current status of safety issues at every plant in the United States. In reference to an unverified "high priority" safety issue (Station Blackout -- A-44) at Washington Nuclear 2, Mr. Henderson stated that for a decade or longer the NRC has not cleared its database. The NRC spokesperson stated, "We had this on our to-do list — for a while." He added that the NRC never updated its database and that it does not have a plan to do so.

This assertion is extremely disturbing. If Mr. Henderson's statement is true, then the NRC is unable to unequivocally identify which safety issues are unimplemented and unverified at which plants. If so, the NRC truly is not performing one of its most basic requirements as an industry regulator.

The fact that the NRC is disseminating information that has been outdated for a decade or longer is clearly outrageous. Plant safety is in jeopardy if the NRC cannot distinguish between what deficiencies have been fixed, what deficiencies need to be fixed, and what deficiencies have or have not been verified by the NRC.

While this problem may be considered to be a computer glitch or a problem only on paper, POGO believes that plant safety is being neglected. The GAO recently confirmed this belief when it found,

"NRC has not taken aggressive enforcement action to force the licensees to fix their long-standing safety problems on a timely basis. As a result, the plant's conditions have worsened, making safety margins smaller."

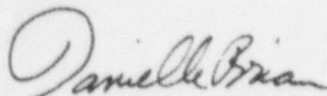
POGO recommends that the NRC immediately perform the following:

- Update all databases detailing the status of all safety issues at nuclear power plants. This should include all Unresolved Safety Issues (USI), Generic Safety Issues (GSI), TMI Action Plan Requirements, and other Multiplant Action Issues.
- Create time limits for plants to implement NRC resolutions for safety issues. If these limits are not adhered to, the NRC should impose penalties upon the violating plant until the resolution has been implemented
- Require NRC verification of the plants' solutions within a reasonable time.

These recommendations are the least the agency can do to resolve safety concerns -- the vast majority of which have been defined by the NRC as being a "high priority."

I would appreciate hearing from you if there has been any progress concerning safety issues since our meeting. Thank you for taking the time to handle this very important safety issue. If you have any questions concerning our report, update or the subject of this letter, please contact me or Scott Amey at (202) 466-5539.

Sincerely,



Danielle Brian  
Executive Director

enc.



# NRC finds missing generator

By DON McMANMAN

Herald staff writer

The case of the missing nuclear plant emergency generator—which wasn't missing at all—has been solved.

And it all began with lax paperwork management at the Nuclear Regulatory Commission.

On Monday, a self-proclaimed watchdog group announced the commercial nuclear plant north of Richland didn't have an emergency generator.

The Project On Government Oversight (POGO) went on to say such generators are necessary "for the reactor to continue functioning during a 'blackout' without melting down."

Trouble is, the Washington Public Power Supply System has three emergency generators, and the Herald said so.

On Tuesday, POGO's executive director, Danielle Brian, denounced the Herald story, saying her press release never indicated there were no generators at WPPSS.

But the Herald quoted her press release word for word.

Brian said her Washington, D.C.-based group was trying to say the NRC had not verified that the emergency generators were in place.

But another spokeswoman in her office had a different story on Tuesday. POGO's Shata Stucky told KEPR-TV newsman Rick Miller the issue was this: The WPPSS generators hadn't been tested.

But they had, every month, most recently last week—and each time in the presence of an NRC inspector, said Mary Ace, a WPPSS spokeswoman.

To Ace's knowledge, no one from POGO has spoken to WPPSS, despite what the group described as a three-year investigation into such safety issues. "We would welcome them to contact us," Ace said.

But Brian said POGO won't—that the group doesn't see any need to confirm its press-release visions of nuclear meltdown.

"What (WPPSS) tells to me isn't enough," Brian said Thursday. "I want the federal investigators to tell me."

The federal investigators hadn't.

POGO faxed the Herald an NRC document that listed several nuclear power stations and listed whether they had addressed the issue of emergency power during a blackout. In the column labeled "implemen-

tation status," the document said "completed" next to WPPSS' name. But under the column labeled "verification status," the document said "open." And that was a mistake, said Breck Henderson, an NRC spokesman in Arlington, Texas.

"We had this on our to-do list—to clear that database—for a while," Henderson said.

"For a while," in this case, was a decade—or even longer.

In 1987, NRC told nuclear plants they must meet a new standard for emergency power. For some plants, it meant a third generator to supplement two emergency generators already on hand.

But WPPSS already had three. They were installed before the plant began operating in 1984.

So WPPSS met the new requirement even before the new requirement was written.

But the NRC never got around to updating its database, Henderson said.

When commercial nuclear plants make such paperwork errors, the NRC gets downright peevish, demanding explanations and plans for improvement.

But does NRC have such a self-improvement plan for this glitch?

"I don't think we've progressed to that point yet," Henderson said.

Don McManman can be reached at 582-1543 or via e-mail at dmcmanman@tri-cityherald.com