



June 20, 1985

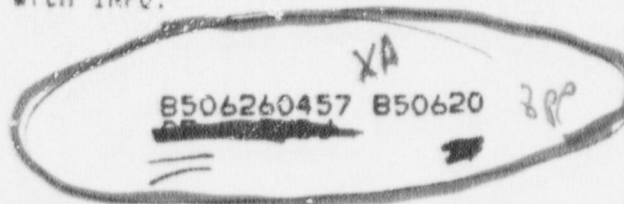
Mr. William T. Russell, Acting Director  
Division of Human Factors Safety  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Russell:

Thank you for your letter of May 29, 1985 concerning maintenance performance indicators. I am pleased that the NRC has a favorable view of the program and that you agree that any further changes should be based on experience. As a status report, INPO has received the first round of data from the utilities and they are now analyzing the data.

Regarding your request for access to and audit of the plant-specific data that is being collected by INPO, I have several comments:

- ° INPO has accepted the request from NUMARC to administer the maintenance performance indicators and, in fact, they will incorporate this within their larger utility performance indicator program that has been in progress for some time.
- ° It is my understanding that the INPO charter and INPO's relations with its member utilities would not accommodate them giving plant specific performance data to the NRC. I have asked Mr. Pat Beard to clarify this policy directly with you. Also, NUMARC is not in a position to direct or authorize such action by INPO.
- ° Your request appears to go beyond the concept that we have previously discussed where the NRC will independently monitor industry performance as well as share information and views in periodic meetings with NUMARC and INPO. It is my understanding that, under the existing NRC/INPO Memorandum of Understanding, NRC staff could periodically review plant-specific performance data at INPO but that the data will remain with INPO.



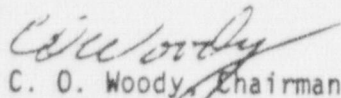
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I believe the above concept will meet our mutual objective of cooperation and sharing of information and also allow NUMARC and INPO to proceed in the spirit of self-improvement.

I look forward to our first information exchange meeting on July 16, 1985 in Charlotte, North Carolina. An agenda for this meeting will be sent to you next week.

Sincerely,

  
C. O. Woody, Chairman  
NUMARC Working Group #4

COW:bg

cc: J. H. Miller, Jr.  
W. H. Owen  
Z. T. Pate  
P. M. Beard, Jr.

May 29, 1985

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Mr. C. O. Woody, Chairman  
Working Group Number 4  
Nuclear Utility Management and  
Human Resources Committee  
P. O. Box 724928  
Atlanta, GA 30339

Dear Mr. Woody:

The NRC staff has reviewed the revisions to Maintenance Performance Indicators proposed by your Working Group. It is gratifying to note that many of NRC's recommendations regarding the original set of maintenance indicators have been incorporated into the revision. I believe that NUMARC's efforts have produced a sound starting set of maintenance performance indicators and that any additional changes should be based upon experience gained through actual collection and analysis of data.

Fundamental to NRC's use of maintenance indicators, as a measure of industry's maintenance program improvement, is the NRC staff's ability to independently verify on an audit basis the validity and reliability of industry generated data. This would assure the Commission and the public that the maintenance indicator data base is valid. Accordingly, I request that NUMARC authorize INPO to release maintenance indicators data to the NRC under our existing Memorandum of Agreement with INPO. Plant-specific maintenance indicators data collected by INPO for NUMARC would be protected in a manner similar to that now utilized to protect the NPRDS data base and plant-specific NPRDS data. NRC access to the maintenance indicator data base could either be on a "read only" interactive terminal or by periodic transmittal of a data tape for NRC use. We would limit personnel access to NRC staff and NRC contractors on a "need to know" basis.

I am encouraged by the excellent cooperation between the staff and NUMARC's Working Group 4 regarding industry's efforts to both improve and quantify the improvement in nuclear plant maintenance performance. Industry's success in improving plant maintenance performance and the staff's ability to verify that success are important results to demonstrate the effectiveness of industry's self policing efforts.

Sincerely,

*William T. Russell*

William T. Russell, Acting Director  
Division of Human Factors Safety  
Office of Nuclear Reactor Regulation

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DHFS:DW/WOODY

OFFICE	DHFS:AD	DEDRGR	DEDRGR				
SURNAME	WTRussell:pa	JSniezek	VStello				
DATE	5/14/85	5/29/85	5/29/85				



JUSTIFICATION FOR GENERIC ISSUE SCHEDULE SLIPPAGE

AR 5603A

*need comment  
ASAP - due to  
held on waiting  
NRD's comment  
Ref  
4/3/85*

Issue Number	Issue Type	Action Level	Office/Div/Br	Task Manager	TAC No.
III.D.3.1	Safety/High	Active-L1	NRR/DSI/RAB	R.J. Serbu	42928

Summary of resolution progress to date

A method to assess industry progress and success in achieving ALARA-integrated radiation protection programs, based on trends in 11 areas of radiological controls, has been developed by the NRC staff. INPO agreed to provide data to support the program, however, INPO's routine data gathering schedule was not compatible with the planned NRC resolution date. To accommodate INPO's routine schedule, and still allow the NRC staff adequate time for integration, review and analysis of information and data, the 3/85 completion date was revised to 9/85.

INPO has compiled industry radiation protection performance trends based on INPO proprietary data. This data has been reviewed with NRC staff (on 4/1/85), but has not been published or made formally available to the NRC.

NRC staff has compiled data in several areas, and Regional evaluation programs are in progress.

Preliminary data and information from unofficial sources indicate that practical resolution of III.D.3.1 can be achieved, however, there may be delays in compiling the additional NRC-originated documentation (in place of INPO data) needed for official resolution of the issue.

New resolution date

Revised from 3/85 to 9/85

Identify whether progress to date is considered satisfactory or unsatisfactory

Progress to date has been satisfactory, however, problems have come up which may further impact the revised completion date in the following areas:

- (1) Availability and use of INPO data for the evaluation program
- (2) Replacing INPO data with NRC-originated data
- (3) Expediting the establishment of a radiological data base
- (4) Timely completion of the Regional evaluation portion of the evaluation program

Describe actions that are being or should be taken to improve schedule or prevent further slippage both inside and outside the Division

- (1) The staff will attempt to get INPO summary data for the evaluation through indirect, but official channels. INPO proprietary data will not be available to the NRC for the evaluation process due to INPO concerns over FOIA requests, and INPO concerns that the direct use of such data by the NRC would cast INPO in a regulatory support role.

- (2) The staff is presently locating and compiling radiological trends duplicating those compiled by INPO. There is no central radiological data base to access for this task, so other organizations within the NRC are being queried for pertinent information. The effort will be extensive (e.g. review all semi-annual reports for '79 - '84), and additional manpower will be needed.
- (3) The RAB staff is attempting to establish a broad NRC radiological data compilation and trending capability through the development of a radiological data base program. The effort presently proposed would be developed through a RES contract and would coordinate all essential NRC radiological information sources based on user (i.e. RAB, IE/ORPB, Regions) needs. DSI initiated a request for research assistance to RES on 2/7/85. This letter has been in DST since 2/14/85. If DST reverses its previous support for the project, the effort could be managed by DSI/RAB. An additional problem lies in the reluctance of RES to support any occupational health activities in the coming year. Additionally, RAB expects to receive IBM PC hardware and software which will be used to access, compile and analyze data. Available data is being manually compiled in the interim.
- (4) A completion date of 7/85 has been requested of the Regions to complete their portions of the evaluation. Administrative delays in authorizing the work effort, and in finalizing the scope of the evaluation program, have impacted the probable availability of all Regional data for the final evaluation.

DE. ST	Issue Type	Action Level	Office/Div/Br	Task Manager	Task No
III.D.3.1	Safety/ High.	Active-L1	NRR/DS1/RAB <del>DE/DSR3/RAB</del> <del>DE/DSR3/RAB</del>	R. J. Serbu	42928

Title ----- Radiation Protection Plans

Work Authorization --- NRR FY-84 Operating Plan (Appendix 6).

Contract Title ----- None

Contractor Name/  
FIN No. ----- None

Work Scope ----- Finalize a "Letter of Agreement" which outlines the relationship between INPD and the NRC during the period when INPD will actively assist licensees in implementing ALARA-integrated radiation protection programs. Develop an auditing method whereby the NRC can assess INPD/industry progress and success in achieving ALARA integrated radiation protection programs.

- Affected Documents --- Directly Related Documents

- 1. Evaluation of Industry Efforts to Achieve Successful ALARA Integrated Radiation Protection Programs (April 28, 1982) Dr. Muller to Division Director - evaluation criteria, worksheets and examples for applying to evaluate aspects of industry radiation protection programs.
- 2. "Request for the Region to Assist in the Evaluation of Industry Efforts in Achieving ALARA-Integrated Radiation Protection Programs at Power Reactors" (the Thompson to the Division Director) May 6, 1982.
- 3. "Request for Research Assistance in Establishing a Radiological Data Base" (W.R. Dutton to R.D. Morgan - not for concurrence) ORR/DSR3 June 14/83

1. "Memorandum of Agreement Between INPD and the USNRC" (April 1, 1982), Appendix Number Three, "Coordination Plan for Radiological Protection Activities" (March 3, 1983).

2. NUREG-0761 (draft March 1981) - revised into Regulatory Guide format as R.G.8.XX.

3. R.G. 8.XX - revise and hold for issue pending success of INPD/Industry.

4. "Development of a Program to Evaluate Industry Efforts to Achieve Successful ALARA-Integrated Radiation Protection programs," (R. J. Mattison, June 16, 1983). - Action Plan/Assessment Method - developed to evaluate INPD/industry progress and success in implementing ALARA integrated radiation protection programs.

Status ----- A "Coordination Plan for Radiological Protection Activities," effective March 3, 1983, has been prepared by NRC/INPD staffs and approved by the NRC EDO and the President, INPD as Appendix 3 to the NRC/INPD Memorandum of Agreement dated April 1, 1982. A Commission Information Paper discussing the Coordination Plan and related staff actions was provided

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As of ~~Fourth~~ Quarter FY-84



to the Commission by the NRC staff. Following coordination between NRR, RES, IE, and the Regions, a program to evaluate INPO/industry efforts under the Coordination Plan was promulgated (R. J. Mattson letter dated June 16, 1983, "Development of a Program to Evaluate Industry Efforts to Achieve Successful ALARA - Integrated Radiation Protection Programs"). The staff completed a topical review of NRC and INPO radiation protection/ALARA guidance (letter Congel to Muller dated June 30, 1983), and established a schedule with IE and INPO in June 1983 to accompany INPO site visits beginning in September of 1983. NRR Staff members have accompanied INPO personnel, as observers, during ~~these~~ INPO site evaluations during the period October 1983 through March 1984. ~~Tentative plans have been made for NRR to accompany IE to Atlanta for a 1984 INPO Evaluation Program Status Briefing, were dropped for 1984.~~

Regulatory Guide 8.XX (NUREG-D761) and Revision 4 of Regulatory Guide 8.8 have been held in abeyance, and the NRC staff has proposed delaying any consideration of rulemaking regarding radiation protection plans until the upcoming major revision of Part 20 is promulgated. The NRC staff is continuing its evaluation of industry's radiation protection/ALARA efforts under its evaluation programs as planned. If the staff evaluations find the INPO/industry effort successful, the issue will be considered to be resolved. If the staff evaluations find the INPO/industry effort not to be successful, the staff will resume efforts to promptly issue R.G. 8.XX and pursue related rulemaking.

Based on staff experience with the NRC/INPO Coordination Plan and evaluation program, the staff intends to research, format and analyze existing NRC information sources to establish a radiological data base which will (1) provide an NRC-originated source of radiological data, (2) broaden our overall trending and analysis capability in radiation protection, (3) support future cooperation with INPO by supplementing our data sharing with INPO, and (4) provide further capability to validate the findings and conclusions of our industry evaluation program.

Information essential to the evaluation process ~~has been developed~~ <sup>has been developed</sup> by INPO ~~in 1985~~ <sup>in 1985</sup> - an earlier date would not have been consistent with existing INPO reporting requirements for utilities. This necessitated adjusting the original 03/85 evaluation of INPO/industry success in achieving ALARA-integrated radiation protection programs (and subsequent milestones) to 09/85 to enable the staff to review and integrate this data, perform an evaluation, and publish the results.

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The free flow of information ~~from INPO~~ <sup>from INPO</sup> has been hampered by INPO's reluctance to provide information to the NRC (in summary or detail) which could then be requested under FOIA by intervenor groups, or compiled and analyzed by NRC staff for regulatory purposes.

The staff has made an effort to expedite its capability to compile and analyze NRC-originated data, however delays in ST and RES policies regarding occupational dose research have offset this effort. Additional time may be necessary to Problem/Resolution establish a radiological data base, particularly if AEC/INPO must assume its effort.

Other circumstance would result in a delay against the best of the industry INPO efforts.

Since the NRC staff had originally intended to utilize and use INPO data in conjunction with NRC originated data, it is now necessary for NRC staff to create all data for all evaluation activities, in lieu of sharing the effort with INPO.

Technical Resolution - Milestones are as follows:

<u>Milestones</u>	<u>Original</u>	<u>Current</u>	<u>Actual</u>
Draft Proposed Revised NRC/INPO Coordination Plan distributed for review and comment by OIE, RES, and Director, DSI.	-	-	01/19/83
Draft Plan to INPO Staff for review and comment.	-	-	01/26/83
Staff Recommendation to EDO to transmit proposed Coordination Plan to INPO (Follow-up to INPO (Wilkinson) letter dated August 26, 1983).	-	-	02/25/83
Coordination Plan signed and in effect.	-	-	03/03/83
Draft auditable criteria for ALARA/radiation protection evaluation of INPO Program, including ALARA checklists and evaluation criteria, distribute to IE, RES, and Regions for comment.	04/83	-	04/15/83
Revise evaluation criteria based on comments.	06/83	-	06/15/83
Complete a topical/functional comparison of INPO objectives, criteria and guidelines against NRC criteria.	06/83	-	-
Establish ALARA checklist parameter, SALP/inspection findings, etc., tracking system.	07/83	-	06/15/83
Establish schedule of NRC accompanied INPO Appraisals.	09/83	-	07/06/83
Draft criteria for determination of acceptability/unacceptability of INPO/Industry success.	10/83	-	06/15/83
Establish milestone for criteria approved process.	10/83	-	06/15/83

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Milestones

	<u>Original</u>	<u>Current</u>	<u>Actual</u>
Finalize criteria for determination of acceptability/unacceptability of INPO/Industry success.-	12/83	-	06/15/83
Receive INPO input	-		
Initiate radiological data base	-	04/85	04/01/85
Evaluation of INPO/industry success completed.	03/85	08/85	-
		09/85	-
Radiation Protection Plan RG either issued or withdrawn.	03/85	09/85	-
Technical Resolution Complete (Implementation recommendations or close-out documentation memo to EDO).	03/85	09/85	-

TASK MANAGER VERIFICATION

Date \_\_\_\_\_

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As of Second Quarter FY-85