

TENNESSEE VALLEY AUTHORITY

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JUN 14 1989

U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

Gentlemen:

NUCLEAR EXPERIENCE REVIEW PROGRAM REVISION

The current requirement and commitment for review and screening of Licensee Event Reports (LERs) from sister plants of Sequoyah and Browns Ferry Nuclear Plants was made to NRC in a March 30, 1988, letter from R. L. Gridley. The commitment was in response to a recommendation from the Advisory Committee on Reactor Safeguards (ACRS).

TVA discussed revision of this commitment with NRC staff representatives in a telephone conversation on May 31, 1989. TVA participates in and takes credit for the review effort being performed by the Institute of Nuclear Power Operations (INPO) Significant Event Evaluation and Information Network (SEE-IN) program. Participation in the INPO SEE-IN program will provide operational process improvements, better utilization of current manpower, and is acceptable from a regulatory position as documented by the NRC in Generic Letter 82-04. The justification for discontinuing this review is discussed in detail in the enclosure. Therefore, TVA is discontinuing the review of sister plant LERs.

If you have any questions, please telephone T. W. Overlid at (615) 751-8801.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*M. L. Ray Jr.*  
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Enclosure  
cc: See page 2

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U.S. Nuclear Regulatory Commission

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cc (Enclosure):

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JUSTIFICATION FOR DISCONTINUING THE REVIEW OF  
LICENSEE EVENT REPORTS (LERs) FOR SISTER PLANTS TO  
SEQUOYAH AND BROWNS FERRY

Background

Past experience has shown that significant events are often the result of previous events, of a lesser nature, that have already occurred in the nuclear industry. One of these events can eventually occur under unanticipated circumstances, resulting in a major event of safety significance.

The major goal of the Institute of Nuclear Power Operations (INPO) Significant Event Evaluation and Information Network (SEE-IN) program is to identify precursors to significant events and report these precursors to all plants in order that corrective action can be taken to mitigate the potential event. This program is conducted on an international level utilizing international operating experience data bases in addition to the United States nuclear utilities operating experience review programs.

Current Requirement/Commitment

The current requirement/commitment for review and screening of LERs from sister plants of Sequoyah (SQN) and Browns Ferry (BFN) Nuclear Plants was made to NRC in a March 30, 1988, letter from R. L. Gridley to respond to a recommendation to the ACRS subcommittee prior to the February 12, 1988, ACRS meeting.

Proposed Revised Commitment

TVA will discontinue the review of individual LERs of sister plants to SQN and BFN, but will participate in and take credit for the INPO SEE-IN program for the screening of LERs for potential safety significance to SQN and BFN.

Operational Program Benefits

In addition to the current scope of the TVA Nuclear Experience Review program, the SEE-IN program utilizes the following utility reports to ensure that essentially all United States plant operating experience and a large portion of available international experience are reviewed and evaluated:

- Monthly Operating Reports
- Preliminary Notifications
- Plant Incident Reports
- AECD Reports
- Supplier Participant Information/Plant Status Reports
- Industrial Safety Reports

The objective of the SEE-IN screening process is to identify those relatively few events from the several thousand reports reviewed that are significant, or potentially significant, to nuclear safety or plant reliability.

To further ensure the proper evaluation of an event as nonsignificant, a second, independent reviewer performs another screening to reduce the likelihood that a significant event might be overlooked. This type review process, in addition to a weekly joint meeting of reviewers for potentially significant and significant events in the Event Analysis Department of INPO, combines to allow events to be considered from several different perspectives and disciplines.

#### Economic Benefits

Utilizing the SEE-IN program will relieve TVA of the burden of the screening of a large number of sister plant LERs. For 1988, the estimated number of manhours spent in processing and distributing the LERs to an assigned organization for action and response was 510 manhours for approximately 120 LERs during a six-month period. For 1989, the estimated manhours, based on an expected number of LERs to be reviewed and evaluated, is projected to be approximately 1600 manhours. This does not include the manhours required of the assigned organization to review, evaluate, respond, or identify corrective actions. Therefore, utilization of the SEE-IN program could allow almost one man-year of effort to be applied to more needed areas and other significant issues.

#### Regulatory Acceptability

Of primary concern to TVA is to have a process for evaluation of operating experience to ensure that no events occur which could have been prevented utilizing available industry information as well as meeting the regulatory requirements pertaining to the experience review program. NUREG-0737, Item I.C.5, as well as Generic Letter 82-04 identifies the regulatory requirements.

NRC has recognized the SEE-IN program as a service that can support utility programs in meeting this regulatory requirement. NRC Generic Letter 82-04 endorsed the use of the SEE-IN program. The following is an excerpt from Generic Letter 82-04:

"The NRC has now completed its review of the SEE-IN program and a recent letter to INPO (copy enclosed) endorses utility use of the program. As stated in the letter, use of SEE-IN will relieve individual nuclear plant operators and constructors of the necessity of setting up large staffs to obtain and screen the large volume of raw data pertaining to operational experience throughout the industry. The NRC believes that full participation in SEE-IN will enhance your ability to meet the intent of the procedures approved under TMI Action Plan Item I.C.5."

The NRC further states that utilization of the SEE-IN program will eliminate duplication if each utility attempts a separate evaluation.

Summary

Revision of TVA's current requirements/commitment to review and evaluate LERS of sister plants to SQN and BFN is justified by the previous information and is summarized below:

- INPO SEE-IN provides operational process improvements.
  - o Second party independent review
  - o Larger base of operational information
  - o Weekly assessments by varied disciplines and perspectives
- Eliminates the duplication of effort being performed by INPO
- Provides economic and manpower relief to focus on other more important areas
- The regulatory position to not perform the reviews is acceptable to NRC as documented in NRC Generic Letter 82-04.