



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

July 05, 2023

MEMORANDUM TO: Patrick W. Finney, Branch Chief
Reactor Inspection Branch
Office of Nuclear Reactor Regulation

FROM: Gregory E. Werner, Branch Chief
Reactor Projects Branch B
Division of Operating Reactor Safety, Region IV

A handwritten signature in blue ink, appearing to read "Gregory E. Werner".

Signed by Werner, Gregory
on 07/05/23

SUBJECT: APPROVAL FOR CREDIT FOR THE WOLF CREEK
GENERATING STATION OPERATIONAL SAFETY REVIEW
TEAM TO THE BASELINE INSPECTION SAMPLES/HOURS

The purpose of this memorandum is to request concurrence for the one-time credit, for the Wolf Creek Generating Station Operational Safety Review Team (OSART) conducted from March 6-23, 2023, to the baseline inspection of the Reactor Oversight Program in accordance with MC 2515, "Light-Water Reactor Inspection Program – Operations Phase", Section 2515-08.05, Baseline Inspection Credit for Operational Safety Review Team Effort.

As an incentive to encourage licensee participation in the OSART mission, the U.S. Nuclear Regulatory Commission (NRC) will grant a one-time regulatory credit (reduction in baseline inspection program) for those NRC baseline inspections, listed in Section 08.05, that overlap, either in part or fully, with the OSART review.

Specifically, MC 2515, Section 08.05 notes that:

In order for the region to take one-time credit for reducing baseline inspections, the areas for which the credit is to be given must have been documented in the OSART report. In addition, an NRC staff person should closely monitor the OSART activities, such as attending the team's briefings to the licensee. The staff person should assess whether the regulatory credit assumptions were appropriate. This person also needs a good understanding of the issues and recommendations made by the OSART. For NRC planning purposes, this effort is estimated to take approximately 40 hours. Also, the region should assure that the OSART inspection report is made publicly available.

During the Wolf Creek OSART Mission the IAEA Team, by IAEA policy, would not allow the resident inspectors to observe the daily OSART meeting nor attend the daily team meetings with the licensee. Therefore, the resident inspectors were not able to fully observe specific OSART mission inspection discussions. Instead, the resident inspectors reviewed Wolf Creek Condition Reports (CR), discussed the OSART mission with the Wolf Creek staff and to gain insights into the issues identified by the OSART mission.

Region IV personnel were allowed to review the OSART's working notes to inform the region of the scope of the inspection. In addition, the draft OSART report was reviewed by the senior project engineer, resident inspectors, health physics inspectors and emergency planning inspectors. It is important to note that the OSART report is similar to NRC reports and contains few details of the inspection and only documents recommendations, suggestions, and good practices. For details on the OSART inspection areas, please see Enclosure 3, "OSART Guidelines," 2022 Edition. Feedback was provided to a senior reactor operations engineer, Reactor Inspection Branch, on the need to update MC 2515 basis for inspection credit to remove the following statement:

In order for the region to take one-time credit for reducing baseline inspections, the areas for which the credit is to be given must have been documented in the OSART report.

For this OSART activity, Region IV recommends a one-time credit of 187 hours be given. The following summarizes the basis for this recommendation. A more detailed inspection procedure (IP) review can be found in Enclosure 1. Please note that MC 2515, Section 08.05 has not been updated to reflect changes in inspection procedures (IP), with IP 71111.22, "Surveillance Testing," and IP 71124.02, "Occupational ALARA Planning and Controls," being deleted and incorporated into other inspection procedures, so modifications were done to adjust inspection credit.

Radiation Safety inspections should be credited 52 hours out of a maximum possible 63 hours. The credit is based on a review of the radiation safety related inspection activities documented in the OSART draft report, working notes, and final report. Because all of the inspection areas contained within the NRC inspection procedures (IP 71124.01 thru IP 71124.08) were not observed during the inspection nor documented in the report, the recommended hours credited to NRC Region IV radiation safety inspection activities were reduced.

Emergency Planning (IP 71114.03 and IP 71114.05) inspections should be credited 10 hours out of a maximum possible 10 hours. The inspection procedure credit is based on review of the emergency planning related inspection activities documented in the OSART draft report, working notes, and final report.

Surveillance Testing and Fire Protection (IP 71111.24 and IP 71111.05AQ) inspections should be credited 0 hours out of maximum possible 224 hours. The credit is based on the summary of surveillance and fire protection inspection activities documented in the OSART draft report, final report and activities documented in the OSART inspection notes. Because the inspection areas contained within the NRC inspection procedures (IP 71111.24 thru IP 71111.05AQ) were not observed during the inspection, no credit is warranted for these areas.

Problem Identification and Resolution (PI&R) (IP 71152B), inspection should be given full credit of 125 hours. The credit is based on the inspection activities documented in the OSART draft report, team working notes, final report, and activities observed during the OSART inspection.

Region IV also reviewed the past inspection credit that was provided for OSART inspections. Specifically, at Sequoyah in January 2018, the NRC credited 169 hours. As noted previously, Region IV is recommending 187 hours of credit be given for the Wolf Creek OSART.

In addition, MC 2515 notes that region should assure that the OSART report will be made publicly available. Since this is an IAEA report, not an NRC report, Region IV will work with the Office of International Programs to determine if the Wolf Creek OSART report will be publicly available.

If you need more information about the content of this memorandum, please contact Greg Werner at (817) 200-1141.

Enclosures:

1. MC 2515-08 Excerpt
2. Attachment 1, Wolf Creek OSART Crediting Recommendation
3. OSART Guidelines, 2022 Edition

APPROVAL FOR CREDIT FOR THE WOLF CREEK OPERATIONAL SAFETY REVIEW TEAM TO THE BASELINE INSPECTION SAMPLES/HOURS DATED JULY 05, 2023.

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DOCUMENT NAME: APPROVAL FOR CREDIT FOR THE WOLF CREEK GENERATING STATION OPERATIONAL SAFETY REVIEW TEAM TO THE BASELINE INSPECTION SAMPLES/HOURS

ADAMS Accession No. **ML23179A213**

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08.05 Baseline Inspection Credit for Operational Safety Review Team Effort. The Operational Safety Review Team (OSART) review is performed by senior staff members from International Atomic Energy Agency member states. The OSART missions offer a means of assessing licensee performance and reinforcing plant self-assessments through an independent assessment process. OSART's focus is on the safety and reliability of plant operation. They review the operation of the plant and the performance of the plant's management and staff rather than the adequacy of the plant's design and compliance with its licensing basis. Based on a review of sample OSART reports and the OSART guidelines, the staff determined that although the OSART review is not risk-informed, some areas of the review overlap with the ROP baseline inspection program. The NRC believes that it would be beneficial for the U.S. nuclear power industry to continue its participation in the OSART missions.

As an incentive to encourage licensee participation in the OSART mission, the NRC grants a one-time regulatory credit (reduction in baseline inspection program) for those NRC baseline inspections that overlap, either in part or fully, with the OSART review. Accordingly, a 25 percent ROP baseline inspection credit shall be given for the following baseline inspection procedures:

- IP 71111.05, "Fire Protection"
- IP 71111.22, "Surveillance Testing"
- IP 71124.01, "Radiological Hazard Assessment and Exposure Controls"
- IP 71124.02, "Occupational ALARA Planning and Controls"
- IP 71124.03, "In-Plant Airborne Radioactivity Control and Mitigation"
- IP 71124.04, "Occupational Dose Assessment"
- IP 71124.05, "Radiation Monitoring Instrumentation"
- IP 71124.06, "Radioactive Gaseous and Liquid Effluent Treatment"
- IP 71124.07, "Radiological Environmental Monitoring Program"
- IP 71124.08, "Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation"

In addition, a 50 percent ROP baseline inspection credit shall be given for the following inspection procedures:

- IP 71114.03, "Emergency Response Organization Staffing and Augmentation System"
- IP 71114.05, "Maintenance of Emergency Preparedness"
- IP 71152B, "Problem Identification and Resolution"

In order for the region to take one-time credit for reducing baseline inspections, the areas for which the credit is to be given must have been documented in the OSART report. In addition, an NRC staff person should closely monitor the OSART activities, such as attending the team's briefings to the licensee. The staff person should assess whether the regulatory credit assumptions were appropriate. This person also needs a good understanding of the issues and recommendations made by the OSART. For NRC planning purposes, this effort is estimated to take approximately 40 hours. Also, the region should assure that the OSART inspection report is made publicly available. Specific OSART findings should not normally be referenced or followed-up by the NRC, however, where a significant safety issue (potentially greater than Green) or a potential violation of an NRC requirement is identified, the NRC will independently conduct an appropriate baseline inspection to disposition potential violations and assess the significance of the finding in accordance with the ROP.

These findings will be documented in accordance with NRC Inspection Manual Chapter IMC) 0612, "Power Reactor Inspection Reports," and will also be processed as performance assessment inputs equivalent to NRC identified findings in accordance with IMC 0305, "Operating Reactor Assessment Program."

The staff will perform any additional inspections for those findings that have a significance greater than Green in accordance with NRC's Action Matrix. The baseline inspection credit and NRC staff position described above are communicated to the Commission via a memorandum dated July 16, 2003 (ADAMS Accession Numbers: ML031620369 and ML030930251).

WOLF CREEK OSART	Start	Finish				
A 25 percent ROP baseline inspection credit shall be given for the following inspection procedures:						
Resident Baseline Inspections						
IP 71111.24, "Testing and Maintenance of Equipment Important to Risk" (24 samples to 38 samples)	Quarterly	Quarterly	0	0	0	0
IP 71111.05AQ, "Fire Protection" (18 samples to 24 samples)	Quarterly	Quarterly	0	0	0	0
RP Program Inspections						
IP 71124.01, "Radiological Hazard Assessment and Exposure Controls"			10.5		2	0
IP 71124.02, "Occupational ALARA Planning and Controls"			N/A Deleted			
IP 71124.03, "In-Plant Airborne Radioactivity Control and Mitigation"				4	0	1
IP 71124.04, "Occupational Dose Assessment"			5			
IP 71124.05, "Radiation Monitoring Instrumentation"				9.5	0	2
IP 71124.06, "Radioactive Gaseous and Liquid Effluent Treatment"			7.25		1	
IP 71124.07, "Radiological Environmental Monitoring Program"			7.25		1	
IP 71124.08, "Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation"				8.5	0	2
A 50 percent ROP baseline inspection credit shall be given for the following inspection procedures:						
EP Program Inspections						
IP 71114.03, "Emergency Response Organization Staffing and Augmentation System"				4	0	1
IP 71114.05, "Maintenance of Emergency Preparedness"				6	0	1
Corrective Action Program Inspections						
IP 71152B, "Problem Identification and Resolution"				125	0 1/2 sample	

	2023 hrs	2024 hrs	Total hrs
OSART Credit Hours	30	157	187