

October 28, 1999

MEMORANDUM TO: James T. Wiggins, Deputy Regional Administrator, RI
Jon R. Johnson, Deputy Regional Administrator, RII
James L. Caldwell, Deputy Regional Administrator, RIII
Thomas P. Gwynn, Deputy Regional Administrator, RIV

FROM: William M. Dean, Chief
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: PROPOSED REVISION TO SECTION 10, "RESIDENT INSPECTOR
POLICY," OF IMC 2515, "REACTOR INSPECTION PROGRAM -
OPERATIONS PHASE"

On October 8, 1999, we sent an e-mail to regional DRP division directors asking for comments on a proposed change to backshift inspection coverage as addressed in IMC 2515. The proposed change was submitted to address backshift coverage activities where licensees use a compressed work schedule.

Based on the comments received, the response was overwhelmingly to transition to the new 50 hours a year deep backshift coverage per site that is being used for the new Baseline Inspection Program. There would be no defined requirements for backshift coverage since it is expected that the Baseline Inspection Program will involve some backshift coverage as a matter of routine.

The attachment reflects this new policy and is intended to be incorporated into IMC 2515 after receipt and resolution of your comments and review by the ALMPC.

Please provide me your comments by November 15, 1999. Questions may be directed to Cornie Holden at 301-415-1288 (e-mail CFH).

Attachment: As stated

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* See previous concurrence.

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The resident inspectors provide the major onsite NRC presence for direct observation and verification of licensee ongoing activities. The resident inspectors also are primary NRC onsite evaluators for site events or incidents. The greater part of initial event-related inspection effort will be performed by the resident inspectors, who may be supplemented by other inspectors, depending on the type of event. Regional managers will decide when normal inspection activities will be resumed by those involved with inspecting events.

In August of 1981 a policy of inspecting licensee activities during times other than normal routine operating periods was established. The purpose was to remove predictability from the routine inspection program and to provide an insight to the licensee's operating activities at off-normal operating times. The following is the general policy on the extent to which resident inspectors are to provide coverage during late evening and early morning hours and weekends at all sites with one or more units licensed for operation.

- For sites with at least two resident inspectors, at least one resident inspector or qualified region-based alternate should work hours to provide site coverage during the regular workday, Monday through Friday. The intent of this guidance is that site coverage by someone qualified as an inspector not be interrupted for more than three consecutive licensee working days (n.b., Friday-Monday and Tuesday-Wednesday are consecutive working days). Consequently, for extended absences of the resident inspectors, such as for attendance at inspector counterpart meetings, arrangements should be made for appropriate region-based staff coverage. The region-based inspectors should be qualified in accordance with IMC 1245. However, when qualified inspectors are not available, site coverage, can be provided by an individual that is both knowledgeable and experienced in plant operations, and proficient in communicating emerging issues and plant conditions with the licensee and NRC management (e.g., NRR Project Manager, NRR Technical staff member). In order to maximize NRC's efficiency, regional management should attempt to schedule region-based inspections for this time period.
- The Regional Administrator will be notified when the guidance (3 consecutive days) can not be met. All exceptions will be highlighted in the quarterly update via the Quarterly Operating Plan.
- For sites with only a single resident inspector (e.g., because of a vacancy, training or extended illness) the guidance described above should be followed to the maximum extent possible.
- Inspections performed on weekends, holidays, and the weeknight hours between about 10:00 p.m. and 5:00 a.m., are called "deep"

backshift inspections. There are not set hours for backshift inspections since it is expected that the Baseline Inspection Program will involve some backshift coverage on a routine basis. Resident inspectors should devote about 50 hours per year per site to deep backshift inspections (This is a combined effort. No hours are specifically assigned to an individual resident inspector). These inspections should be of at least several hours duration. If deemed appropriate by regional management, this coverage may be provided by regional inspectors in lieu of or in addition to that performed by resident inspectors. (Credit may be taken for regional and headquarters inspection coverage in achieving deep backshift coverage goals.)

- Inspectors should be sensitive to and avoid being predictable in scheduling their deep backshift coverage. In order to maximize the benefit of deep backshift coverage, inspectors should not develop a predictable pattern. Effort should be made to spread the deep backshift coverage over a variety of days and working conditions (outage, normal operations, weekends, nights, etc....).