

# **RIC 2005**

## **Session F-1**

### **ROP / Inspection Program**

**Top Three Challenges / Solutions for CY2005**

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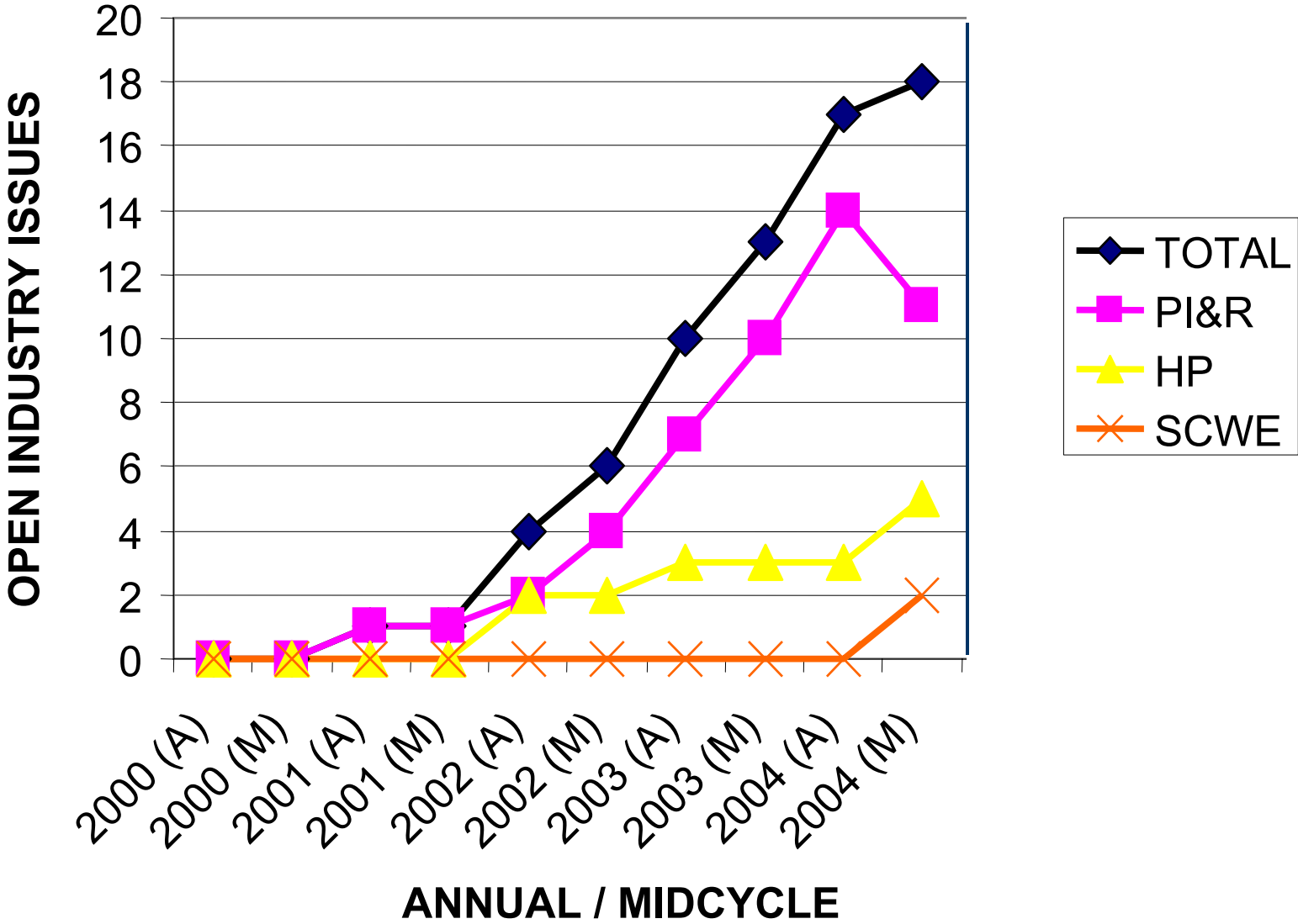
March 8, 2005



# Challenge #1 – Cross Cutting Issues

- Arbitrary criteria for establishing cross cutting aspects and "significant" cross cutting issues.
- ROP guidance is very subjective.
  - lacks criteria for defining the specific aspects making up CCI's.
- The identification of CCI's often lacks the clarity required to ensure the appropriate focus for corrective actions.
- Exit criteria to be used to assess removal of CCI are very subjective. Difficult to close CCI's.

# SUBSTANTIVE CROSS-CUTTING ISSUES



# Solution #1 – Cross Cutting Issues

- NEI form a working group with NRC
  - develop a set of guidelines
  - adopt set of criteria. The criteria should be documented.
  - NRC inspectors and site personnel be trained on the new criteria.

# Challenge #2 – Subjective Assessment of Findings

- Subjective action toward Findings that do not fit in an SDP
  - Generally classified as:
    - 10 CFR 50 Appendix B, Criterion XVI violation, or
    - Tagged as cross cutting issue

# Challenge #2 – Subjective Assessment of Findings (cont)

- Example: Corrective action associated with conditions classified as "adverse to quality."
  - Rule: Conditions adverse to quality need to be promptly identified and corrected.
  - If problem recurs, some inspectors view the recurrence as ineffective corrective action because the root cause was not addressed.
  - However, no requirement in Criterion XVI to address the root cause of all condition adverse to quality.
  - Result: Finding tagged as Problem Identification and Resolution (PI&R) cross-cutting aspect.
    - Corrective action program requirements do not require "prevention of recurrence" for all issues and, therefore, to tag a recurrence of such an issue with a PI&R cross-cutting aspect is incorrect.

## Solution # 2 - Assessing Finding Significance with SDP

- Stay within the existing regulation.
  - Some conditions adverse to quality may repeat.
- If a trend is evident then the condition should be elevated to a significant issue adverse to quality.

# Challenge #3 – SDP Results Not Equivalent Across ROP Cornerstones

- Emergency Preparedness, Security, Radiation Protection, and Fire Protection issues are evaluated using processes that are more deterministic in nature.
  - These SDPs tend to exaggerate the actual risk.
- Initiating Events, Mitigating Systems and Barrier Integrity are the most risk informed.
- Actions taken by the NRC to address performance issues for licensees outside the Licensee Response Column conform to the current ROP program. But Improvements should be considered.
- The consequences of being outside the Licensee Response Column are severe enough to encourage licensees to resist any type of input greater than green, especially findings that are categorized using deterministic SDPs.



## Solution #3 - SDP Results Not Equivalent Across ROP Cornerstones

- Minimize "Specialized" SDPs
- If necessary, consider increasing the number of white inputs into the Action Matrix from 2 to 3 for placing a licensee in Degraded Cornerstone Column, or
- reduce the length of time a finding remains active to a time period that is commensurate with the significance of the finding.