



**RIC 2009
Regional Breakout Session
A Dialogue to Raise Awareness of
Operating Nuclear Power Plant Issues**

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General Session Information

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**RIC 2009
Regional Breakout Session
Raising Awareness of Operating NPP Issues
Topics of Discussion**

- Leveraging Operating and Regulatory Experience
- Industry Perspective
- Construction Lifecycle Issues
- Operator Licensing Challenges
- Allocating Our Safety Culture Energies
- 10 CFR Part 26, Subpart I, "Managing Fatigue"

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Leveraging Operating and Regulatory Experience

- Sources of Operating Experience – How much of what we see today is truly new?
- What Operating Experience is Gathered and Publicly Disseminated by NRC?
- Regulatory Experience – Is industry sharing issues?
- Sharing ISFSI Experience and Information
- Sharing EP & Security Planning Experience
- Incorporating License Renewal Experience Going Forward, “Knowing what we don’t know...”

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Construction Lifecycle Issues

- Regional roles and responsibilities during construction lifecycle
 - ▶ Pre-construction activities
 - ▶ Construction impact on operating units
 - ▶ Host region involvement (“non-construction areas” and pre-op testing)
- Coordination during transition to operations
 - ▶ Host region involvement in operational program areas
 - ▶ Operator licensing examinations
 - ▶ Operational readiness reviews
 - ▶ Transition to the Reactor Oversight Program
 - ▶ Resident staffing transition
- Inter-office/region working group

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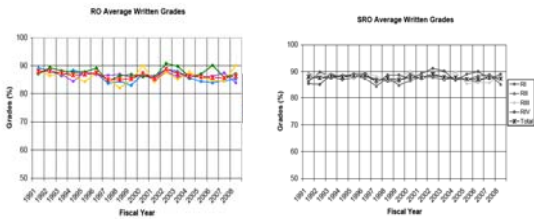
Operator Licensing Challenges

- Exam quality
 - ▶ application of NUREG-1021 criteria
 - ▶ continuity of exam writers due to job changes/retirements
- Applicants
 - ▶ declining performance, although not a significant decline in failure rates
 - ▶ medical condition license adherence
 - ▶ learning differences
- Licensed operator workforce
 - ▶ overtime/fatigue concerns
 - ▶ additional reactors

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Trends in RO/SRO Exam Performance



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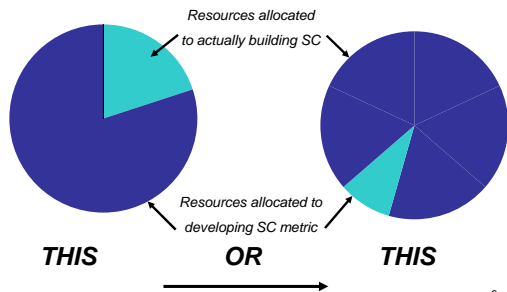
Allocating Our Safety Culture Energies

NRC Regulatory Information Conference
March 11, 2009

Eugene S. Grecheck
Vice President Nuclear
Development
Dominion Generation

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Need to focus energy on building Safety Culture, not just measuring it



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Current NRC approach to regulating safety culture

- Looks at a small set of data (10-15 findings/year)
- Aspect determination subjective
- Not in line with ROP principles: safety focused, objective, transparent
- Diverts licensee and NRC attention from appropriate roles of direct responsibility and oversight

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Industry alternative

- Base assessments on desired behaviors and attributes
- INPO Principles for a Strong Nuclear Safety Culture
- Common guidelines for safety culture assessments
- Holistic and integrated look at safety culture to permit site leadership to act in a timely manner

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Recommendations going forward

- NRC work with industry to transition to alternative approach
- Create a common set of principles/components for NRC and industry
- NRC inspection program should include an enhanced PI&R procedure to look at effectiveness
- Start the dialog on implications for new construction

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10 CFR Part 26, Subpart I "Managing Fatigue"

- NRC Implementation Strategy
 - ▶ Temporary Instruction
 - ▶ Inspection procedure revisions
 - ▶ Appendix C inspection procedure for allegation followup or if systematic fatigue problems are identified
 - ▶ Training for inspectors
- Issues
 - ▶ Consistency of Implementation and Enforcement
 - ▶ Periodic and Infrequent Overtime
 - ▶ Outage Minimum Days Off (MDO)

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RIC 2009 Regional Breakout Session Unanswered Questions?

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