



**RIC 2010
Inspection Insights Related to
Inspection Procedure (IP) 71003
Implementation**

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Overview – IP 71003

- Issues identified
- Objectives and Alignment of guidance
- Plants with Renewal Under Review
- Sampling, Results, and Inspector Training
- Current operating experience (OpE)
- Longer term inspection requirements

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Issues Identified – IP 71003

- Lessons learned for logistics and inspection package preparations
- Items of concern to findings
 - Performance deficiencies more than minor
- Can improve guidance to ensure better regional consistency
- All regional feedback communicated through ROP feedbacks to HQ for clarification

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Objectives of IP 71003

- **Considering addition of 2 objectives:**
 - To address current Operational Experience within license renewal
 - To address completion and future inspections
- **Guidance on which NRC organization is responsible for ensuring licensee readiness for operations in the extended period:**
 - Letter to the NRC stating commitments met
 - IP 71003 Inspection team report or summary
- **Can better align inspection requirements to specific guidance**

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Plants With Renewal Under Review

- **Inspection Program can be clarified –**
 - IP 71003 assumes the license is renewed which makes IMC2515 – ROP is applicable
 - For plants with a delayed renewal review, IMC 2516 – License Renewal Inspection Program, is also applicable
- **Can improve guidance on the scope of review, necessary observations/objectives, and documentation and assessment requirements**
- **Industry should clarify the difference between a “regulatory commitment” and a “planned action”**

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Sampling, Results, & Training

- **For assessment through sampling of SER/UFSAR list of future actions from the date of the renewed license:**
 - Possibility of providing a list of completed actions, in progress actions, and those of high risk or high public interest
 - License conditions should be verified (or have a status) even though they may not be in effect yet
- **Results** – Reference the document that screens performance deficiencies for more than minor and assesses findings (may be internal to IP, App. G to IMC 0612, other document)
- **Inspector Training** – Procedure or other document can be expanded to provided some background for inspectors with limited license renewal experience

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Current Operating Experience

- **Current Topics at the Time of the Inspection:**
 - Aging Management issues related to boral, buried pipes, submerged cables, containment liner degradation, etc.
- **The Future** – 5, 10, 15 years from now there will be other issues needing verification
- **Possible Solution** –have inspectors interface with NRR, identify the current issues, and check licensee action during the inspection

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End of Phase Review for Completion/Future Inspection Needs

- **Third phase of IP implementation (PEO to the end of first refueling outage after PEO)** – Opportunity to review completion status of inspection requirements for IP 71003 – complete additional sampling if needed – interface with resident and region inspectors for important developments.
- **Results of Review** – May identify additional needed inspection requirements associated the plant or on a generic basis?
- **Possible Solutions** – To be addressed through ROP feedback resolution and appropriate interface with industry for any program or inspection procedure changes.

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Summary

- **IP 71003 Initial Scope of Review Remains Sound** – Phased approach – check all license conditions – sample check future actions subject to license conditions – review changes to license conditions or regulatory commitments – review newly identified SSCs – check updated UFSAR.
- **Clarifications Needed** – As noted herein with respect to objectives and alignment of inspection requirements to guidance and for assessing inspector identified items of concern.
- **Two Possible New Objectives** – dealing with current Op E in the area of license renewal and review for completeness along future inspection actions at the end of the third phase of implementation of the IP.
- **Special Guidance** – if IP 71003 is to be used for a plant in the IMC 2516 (without a renewed license) – 71003 is designed for plant with a renewed license in IMC 2515 – ROP.
- **Questions**

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