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Missing Elements of Cumulative Effects of Regulation Efforts

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APPENDIX B - COMPILATION OF ISSUE ASSESSMENT

Develop	Issue Title	Cat.	Importance Ranking					Reliability	NET Priority	Plant Relative Priority	Comments
			Safety	Security	EP	RP	Reliability				
PAL01	Additional Direct Driven Auxiliary Feedwater Pump	Spec	H	VL	N	N	N	2	1		
PAL02	Incipient Detection in Cable Spreading and Electrical Equipment Rooms	Spec	H	N	N	N	N	2	2		
PAL03	Electrical Coordination Modifications	Spec	H	N	N	N	N	2	3		
PAL04	Control Tower E-Stop Replacement due to Aging	Plant	VL	N	N	N	H	2	4		
PAL05	Mechanical SSC Modification (Pukabehna)	Spec	L	N	N	N	N	3	5	Consider additional FLUX benefit to these modifications.	
PAL06	Seismic SSC Evaluations (Pukabehna)	Spec	L	N	N	N	N	3	6	Re-evaluate following completion of seismic evaluation.	
PAL07	Combine EOPs and SARs into one Procedure (Pukabehna)	Spec	L	N	VL	N	N	3	7		
PAL08	Replace Refueling Machine Control Console due to Aging	Plant	N	N	N	N	L	4	8		
PAL09	Primary Coolant Pump Seal Replacement Aging	Plant	VL	N	N	N	L	4	9		
PAL10	Safety Isolated MCC L2J & B Breaker Replacement Aging	Plant	VL	L	N	N	VL	4	10		
PAL11	Personnel Personnel Fall Protection Install at the Cavity TR PE	Plant	N	N	N	N	N	4	11	This is a personnel safety issue. Draft guidance does not address personnel safety. Appropriation money downgraded to a 4 due to minimal cost benefit for radiation protection.	

Source: ML14349A378



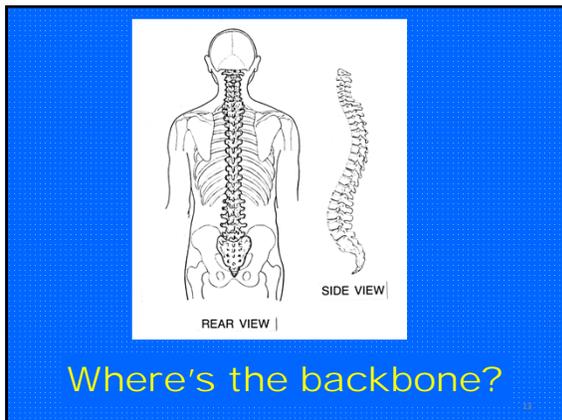
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Develop	Issue Title	Cat.	Importance Ranking					Reliability	NET Priority	Plant Relative Priority	Comments
			Safety	Security	EP	RP	Reliability				
PAL01	Additional Direct Driven Auxiliary Feedwater Pump	Spec	H	VL	N	N	N	2	1		
PAL02	Incipient Detection in Cable Spreading and Electrical Equipment Rooms	Spec	H	N	N	N	N	2	2		
PAL03	Electrical Coordination Modifications	Spec	H	N	N	N	N	2	3		
PAL04	Control Tower E-Stop Replacement due to Aging	Plant	VL	N	N	N	H	2	4		
PAL05	Mechanical SSC Modification (Pukabehna)	Spec	L	N	N	N	N	3	5	Consider additional FLUX benefit to these modifications.	
PAL06	Seismic SSC Evaluations (Pukabehna)	Spec	L	N	N	N	N	3	6	Re-evaluate following completion of seismic evaluation.	
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PAL11	Personnel Personnel Fall Protection Install at the Cavity TR PE	Plant	N	N	N	N	N	4	11	This is a personnel safety issue. Draft guidance does not address personnel safety. Appropriation money downgraded to a 4 due to minimal cost benefit for radiation protection.	

Items assigned Priority 2

Source: ML14349A378





What ensures Priority 3 and 4 items get done?

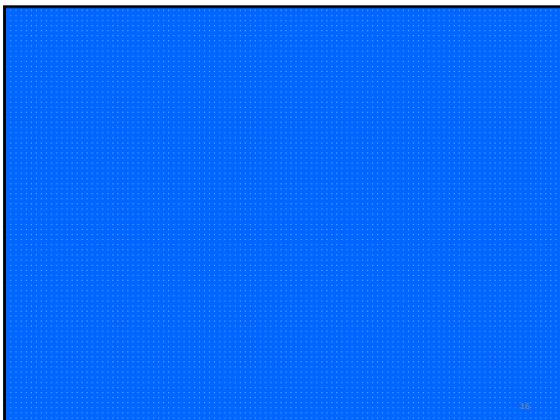
What prevents new Priority 1 and 2 items from perennially postponing Priority 3 and 4 items?

NRC report on pilots: "The process in the NEI draft guidance could result in continual deferral or delay of corrective actions."

APPENDIX B - COMPILATION OF ISSUE ASSESSMENT

Div/Op	Title	Cat.	Importance Ranking					NET Priority	Plant Relative Priority	Comments
			Safety	Security	EOP	WIP	Reliability			
PAU16	Additional Level Drains Auxiliary Feedwater Pump	Spec	H	VL	N	N	N	2	1	
PAU12	Incipient Detection in Cable Spreading and Electrical Equipment Rooms	Spec	H	N	N	N	N	2	2	
PAU13	Electrical Coordination Modifications	Spec	H	N	N	N	N	2	3	
PAU14	Control Room SCRAM Replacement due to Aging	Spec	VL	N	N	N	H	2	4	

What prevents licensees from pruning resources to a level that can only handle Priority 1 and 2s?



Will this process make it even easier to defer safety fixes?

Remember Davis-Besse?

NRC report on pilots: "The potential process for deferral and elimination of low risk regulatory activities was not exercised by any licensee during the demonstration pilots."




Red-Brown Acid Deposits on Vessel Head (D280)

Date	Action (using the term loosely)
3/21/90	Service structure mod initiated
9/27/93	Service structure mod canceled
5/27/94	Service structure mod initiated
3/27/95	Service structure mod tabled
1/07/97	Service structure mod deferred to next outage
9/17/98	Service structure mod deferred to next outage
3/26/04	Reactor restarted after RPV head replaced

Recall how the repeatedly deferring a low priority mod at Davis-Besse invited a very safety significant near-miss?
Will this plan invite Davis-Besse deja vu?

Will this process make it even easier to defer safety fixes?
Remember Oconee?

NRC report on pilots: "The pilot activities did not demonstrate the NEI process for future periodic updates or the inclusion of additional or emerging issues."

Date	Action (using the term loosely)
08/21/01	NRC told about high priority HELB project
05/10/04	NRC told about high priority HELB project
04/28/06	NRC told HELB project will be done by 09/07
06/28/08	NRC told HELB will be done on U1 by 12/12
02/26/14	NRC HELB project "on track" to meet 02/04/16



Source: www.allenmadding.com







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Vice President
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ONS-2014-164

December 19, 2014

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Duke Energy Carolina, LLC (Duke Energy)
Oconee Nuclear Station, Units 1, 2 and 3
Docket Numbers 50-269, 50-270, 50-287
Renewed License Numbers DPR-38, DPR-47, and DPR-55

Subject: Revision to Tornado/HELB Mitigation Strategies and Regulatory Commitment 17T

Duke can design and build a door.

What this letter truly says is that Duke isn't really interested in this safety upgrade and they know the NRC can't (or won't) make them do it.

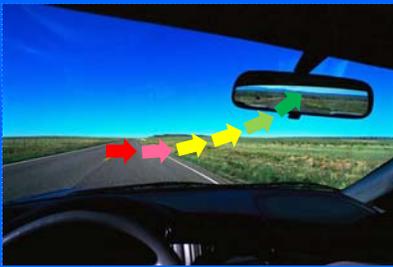
This letter revises Tornado Commitment 17T, which is a modification to improve the protection for a set of double doors on the SSF. The commitment was to complete the modification by January 31, 2015. A design was conceived, and specific design criteria was developed; however, upon moving toward implementation the design was determined to be neither feasible nor constructible. Insufficient time remains to develop and implement a new design prior to the committed due date.

Repeatedly missing deadlines for high priority safety upgrades at Oconee does not instill trust that lower priority stuff ever gets done.

The last thing the public needs and deserves is NRC making it even easier for owners to put off more safety upgrades for longer periods.

The key question any good plan must have a great answer to:

Why did you continue operating with this known safety hazard and defer its solution?



What's missing is a reliable mechanism to ensure items move from the road ahead to the rear-view mirror.

Where's the backstop?



Where's the backbone?

Success involves more than merely plotting the correct path.

Success entails completing all the steps along that path.



NRC's Memo on Pilots

"Compliance issues are the purview of the NRC and the NRC Staff noted that fulfilling those requirements should not fall under a prioritization process that could result in continual deferral or delay of issues." p. 1

"The potential process for deferral and elimination of low risk regulatory activities was not exercised by any licensee during the demonstration pilots." p. 6

"The process in the NEI draft guidance could result in continual deferral or delay of corrective actions." p. 7

"In many of the demonstration pilots, there is at least one plant initiative that ranked higher than other regulatory activities due to a "High" rating in Reliability and "Very Low" rating in Safety. In such instances, a licensee may defer a regulatory activity due to the higher ranking of a reliability-related plant initiative." p. 7

Source: ML14302A222 dated October 29, 2014

NRC's Memo on Pilots

"... the pilot activities did not demonstrate the NEI process for future periodic updates or the inclusion of additional or emerging issues." p. 7

"Since compensatory measures are in place for most security weaknesses, the prioritization process does not adequately identify any deltas in risk." p. 9

"... observation for the Open Phase Condition issue was that the referenced PRA evaluation did not properly model the event. ... The ultimate significance of using the correct model would mean that the relative importance of this plant modification would be much higher than what was shared with the NRC Staff during the demonstration pilots. Thus, if the model is incorrect, the results will be incorrect." p. 11

Source: ML14302A222 dated October 29, 2014 17

NRC's Memo on Pilots

"The NRC Staff noted that for some NFPA 805 modifications, a licensee performed qualitative evaluations for the Safety importance as oppose to quantitative evaluations even though Fire PRA information is readily available. Furthermore, when identifying the "current risk for the issue," there were instances when a licensee used the total risk of the plant versus using the risk associated with the specific issue. This potential inconsistency may affect the ranking of the results." p. 11

"One of the licensees screened the tornado missile RIS issue and the results indicated a "Very Low" rating because the licensee stated that they comply with their design and licensing basis. However, the basis of the RIS is that the NRC has determined that some facilities may be outside their licensing basis." p. 12

Source: ML14302A222 dated October 29, 2014 18
