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**Engineering Inspection Value**

**Nine Mile Point, 2017 – No findings (ML17320A210)**

**Peach Bottom, 2017 – No findings (ML17082A043)**

**Clinton, 2013 – No findings (ML13207A077)**

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**Engineering Inspection Value**

**NRC's Engineering Inspections have great value, whether they identify findings or not.**

**When no findings are identified, it's not because problems were missed, downplayed, gamed or whatever.**

**It's because a very good, unbiased and INDEPENDENT scrubbing effort did not identify any problems.**

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**Design Bases Assurance Findings**

**Palisades, 2017 – EDG testing failed to demonstrate capability to start and accelerate all sequenced loads within design voltage and frequency limits (ML1736A435)**

**Perry, 2017 – CST level instruments susceptible to freezing, impairing transfer of HPCS and RCIC suction to suppression pool (ML18004B072)**

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**Design Bases Assurance Findings**

**Salem, 2017 – 36-month PM to lubricate and clean EDG ventilation dampers was cancelled in 2007 but lubrication task was not added to 6-year damper PM as intended (ML17226A227)**

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**Engineering Inspection Value**

**If a licensee self-assessment identified no findings, UCS would have zero confidence that it meant there were no findings to find.**

**After all, INDEPENDENT inspections found findings at Palisades, Perry, Salem et al that those licensees could NOT (or would NOT) find.**

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## Engineering Inspection Need

In 2013, NRC compiled a 68-page list of 137 50.59 violations between 2001 and 2012, an average of 11.4 violations per year or nearly one per month.

Source: ML13094A257

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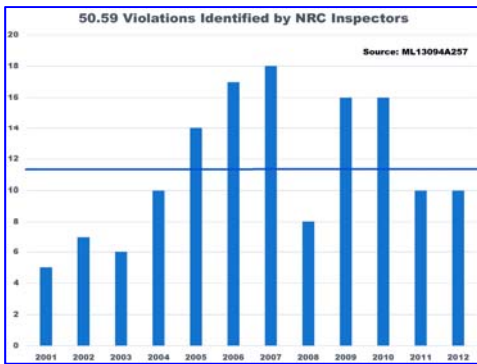
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## Engineering Inspection Need



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## Engineering Inspection Need

2006: "Contrary to 10 CFR 50.59, a screening SE for handling of a 35 ton cask in the spent fuel did not provide an adequate basis to demonstrate that the evaluation for use of a heavier cask did not change the evaluation methods approved by the NRC staff in 1985 for the control of heavy loads, as described in the UFSAR and the [plant name redacted by UCS] licensing basis."

Source: ML13094A257

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## Engineering Inspection Need

2007: "Specifically, the licensee's 10 CFR 50.59 screening failed to provide an evaluation as to why the installation of the HPCI suction piping, which did not meet USA Standard Code for Pressure Piping B31.1 Code requirements, did not present more than a minimal increase in the likelihood of occurrence of a malfunction of a SSC important to safety."

Source: ML13094A257

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## Engineering Inspection Need

2011: "Specifically, the licensee made changes to the acceptance criteria for allowable DG jacket water leakage in the UFSAR that resulted in more than a minimal increase in the likelihood of occurrence of a malfunction of a SSC important to safety."

Source: ML13094A257

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## Engineering Inspection Value

NRC Inspection Findings 2001-2016					
Year	Green	White	Yellow	Red	Total
2001	660	23	2	0	685
2002	783	30	1	2	816
2003	748	19	2	4	773
2004	778	11	0	0	789
2005	840	10	1	0	860
2006	676	13	0	0	689
2007	759	9	2	0	770
2008	776	17	0	0	793
2009	879	7	0	0	886
2010	816	9	2	0	827
2011	846	13	2	0	861
2012	914	16	1	1	932
2013	796	10	2	0	718
2014	793	16	3	0	722
2015	782	8	0	0	790
2016	693	2	4	0	699
<b>Total</b>	<b>12,368</b>	<b>213</b>	<b>22</b>	<b>7</b>	<b>12,610</b>
<b>Annual Average</b>	<b>773.0</b>	<b>13.3</b>	<b>1.4</b>	<b>0.4</b>	<b>788.1</b>
<b>Percent of Total Findings</b>	<b>98.1%</b>	<b>1.7%</b>	<b>0.2%</b>	<b>0.1%</b>	<b>100.0%</b>

98.1% of all findings were GREEN – Engineering Inspection findings were probably GREENer

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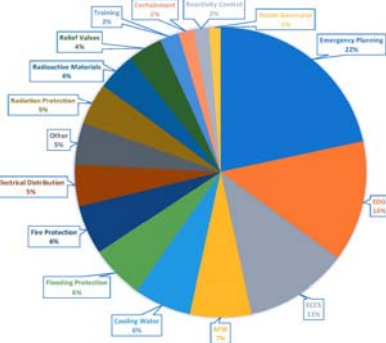
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## Engineering Inspection Value

NRC GREATER-THAN-GREEN INSPECTION FINDINGS, 2001-2016



With the notable exception of Emergency Planning, the majority of greater-than-GREEN findings involved actual events and actual failures.

The latent conditions identified by Engineering Inspections are by their nature GREEN.

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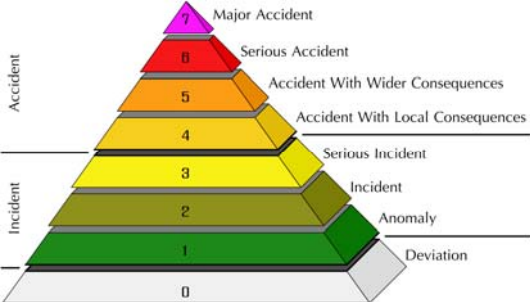
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## Engineering Inspection Value



NRC's Engineering Inspections have a proven track record of **RELIABLY** narrowing the base of the event pyramid, lessening the likelihood of accidents.

Source: Stanford University

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## Engineering Inspection Findings

Do **NOT** mean that the licensees have been incompetent or corrupt.

Demonstrate that subtle, nuanced problems—whether longstanding or newly introduced—can be wicked hard to detect by persons who have long tolerated the conditions or had a hand in creating the conditions.

Are no more valuable than Engineering Inspection non-findings.

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## Engineering Inspection Future

If it ain't broke, don't break it.

Say "no" to self-assessments.

Say "no" to reducing the scale of Engineering Inspections.

Say "yes" to preserving this invaluable public health protective measure.

Source: UCS

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## Engineering Inspection Future

NRC's Engineering Inspections are like flu shots.

Both cost money.

Both involve a little pain.

Both should be endured for the roles they play in preventing higher costs and greater pains.

Source: UCS

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