




Backfitting and Inspection A Licensee's Perspective

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Progress 


- Progress is apparent in re-baselining Backfit rule
 - EDO Actions/Direction/OGC Memorandum
- CRGR Oversight & Review of potential B/F Issues
 - Service Life RIS
 - Oconee TIA
 - Security RG 5.69

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Inspection 


- CRGR Items all Inspection Related
- Inspections continue to present opportunity for growth in application of the Backfit Rule
 - Too many for CRGR to review
 - Lower level potential issues
 - Resource intensive

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Words Matter 

- Plants have approved licensing and design basis
 - Range of detail
 - Documentation standard has evolved
- Inappropriate to use current standards to judge what reviewers found to be acceptable during original licensing


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Words Matter 

Licensee/Inspector Interactions

- Assumptions
- Interpretation
- Reluctance to engage
- Alienate the inspector
- Just a Green NCV
- Challenge – impact margin
- Discern difference between suggestion/recommendation and imposition

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Licensee Control 

- Know & communicate the licensing and design basis
 - Approved designs provide reasonable assurance
 - Inappropriate to use current standards to judge what reviewers found to be acceptable during original licensing
- Understand What is a Backfit
 - Backfit may be appropriate
 - Does not mean the NRC has to drop an inspection issue
- Engage/Elevate

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Observations



- Progress is visible
- Approved designs provide reasonable assurance of adequate protection
- Too many issues for CRGR to judge
 - Simple process to resolve low level backfit claims
- Continued Training on Backfit

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Questions and Feedback



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