

January 29, 2001

MEMORANDUM TO: William M. Dean, Chief
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

FROM: Jeffrey B. Jacobson */RA/*
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

SUBJECT: MINUTES OF CROSS CUTTING ISSUES WORK GROUP

Attached are the minutes from the third meeting of the internal cross cutting issues work group which was held on December 11, 2000.

Attachment: Minutes of the Cross Cutting Issues Workgroup
Meeting Held on December 11, 2000

cc: Wayne D. Lanning, RI
Charles A. Casto, RII
Paul Fredrickson, RII
John A. Grobe, RIII
John Pellet, RIV
Elmo E. Collins, RIV
Daniel Dorman, NRR
Juan Peralta, NRR
Mary Ann Ashley, NRR
Jeffrey Jacobson, NRR

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OFC:	NRR/IIPB		NRR/IIPB					
NAME:	JJacobson *		WMDean *					
DATE:	1/26/01		1/29/01					

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Minutes from Cross Cutting Issues Workgroup December 11, 2000

Introduction and meeting agenda

The meeting began with an introduction by Bill Dean who explained the purpose of the cross cutting issues workgroup and what the overall expectations were for the meeting. The meeting attendees included NRC, industry, and other stakeholders who are listed on the attached attendance list.

Overview of previous meetings

Jeff Jacobson of NRR provided an overview of the first two meetings and described the specific agenda for the meeting. He explained that during the formation of the revised oversight process, the cross cutting issues of problem identification and resolution (PI & R), human performance, and safety conscious work environment were identified as often being the root causes of performance issues. He also reiterated that a fundamental principle of the revised reactor oversight process (ROP) is that the performance indicators and the baseline inspection program will allow these cross cutting issues to be identified in a sufficiently pro-active time-frame to prevent an impact on public health and safety. Some members of the group expressed concern that if the NRC does not engage in a sufficiently pro-active time frame, plant performance could continue to degrade which could result in safety issues that would require extensive corrective actions. Mr. Jacobson explained that the results of the initial implementation of the ROP will be assessed to ensure that the NRC is engaging at an appropriate point in the process.

Mr. Jacobson detailed the five key issues that were raised in the previous meetings with regard to cross cutting issues. The five key issues are as follows:

- Do the performance indicators and baseline inspection program provide sufficient information regarding performance in the cross cutting areas of human performance, safety conscious work environment, and PI & R? For the purpose of this issue, "sufficient information" can be thought of as information of sufficient depth and scope and within a sufficient time frame to allow for appropriate levels of agency interaction.
- Are there other cross cutting issues that warrant additional consideration in the revised oversight process?
- Does the revised reactor oversight process (e.g., inspection program, SDPs, action matrix) provide for proper treatment of cross cutting issues when they are identified? Should the approach be the same for all cross cutting issues or should the approach vary?

Attachment

- What would be the definition of a “substantial” cross cutting issue that would require additional agency actions beyond what the current process would provide?
- Currently, what is the guidance for capturing cross cutting issues in inspection reports?

He also discussed what actions have been taken to address the key issues and what actions are ongoing. There was a general discussion about how many of the issues will not be able to be completely resolved until more data is available to either prove or disprove the fundamental assumption discussed above.

Problem identification and resolution

There was a general discussion on some of the differences in how the current NRC inspection procedure related to PI & R (IP 71152) differs from what had been done in the past. It was explained that the current procedure focuses more on results and includes in its scope any issue that could be seen as risk significant. The old inspection procedure was more programmatic and focused solely on issues that fell within 10 CFR 50 Appendix B requirements. There was also a discussion on the NRC’s expectations with regard to licensee evaluations for issues that result in a “white” or greater significance determination. The NRC explained that its supplemental inspection procedures assume that a root cause evaluation will be performed by the licensee for such instances. If the licensee does not perform the root cause evaluation, the NRC will likely increase its inspection effort as necessary to independently acquire the information necessary to ensure that the root causes of the performance issue have been identified and corrected.

Rick Jacobs of INPO then made a presentation on what recent actions INPO has taken to assess licensee corrective action and self assessment programs. The slides used during the presentation are attached. Mr. Jacobs explained that INPO has increased its emphasis and has developed “principles” documents in both the corrective action and self assessment areas. It was also stated that INPO will be performing benchmarking activities in these areas in the coming year.

The group discussed the feasibility of developing performance indicators in the PI & R area. The general consensus expressed was that this would be very difficult as the PI & R programs are very site specific. There was some agreement that some generic indicators could be developed, but that the thresholds for the indicators would have to be site specific. In general, there was little support for such an effort and some concern was expressed that generic performance indicators in this area might lead to unintended consequences. Some members from the industry detailed some of the site specific performance indicators that they use in the PI & R area such as one for repeat

events. The industry was then asked to provide feedback at the next meeting regarding the NRC's current approach of assessing the effectiveness of PI & R programs in a more qualitative manner.

Human Performance

The group also discussed the need to develop more transparent guides or performance indicators for assessing human performance. In general, the industry representatives thought that resources could be better spent in developing other aspects of the program, as human performance concerns would be identified via the current performance indicators and baseline inspection program. Some industry members stated that many of the industry human performance indicators that they were familiar with are problematic and are easily manipulated. NEI stated that they will be benchmarking the best practices with regard to managing human performance next year. The industry representatives agreed to provide additional feedback at the next meeting as to whether there would be value in developing additional human performance guides or indicators.

Safety conscious work environment

The group discussed the current approach the NRC uses to assess safety conscious work environment. Currently, the only inspection activity where the NRC assesses safety conscious work environment is in the annual PI & R inspection. Some NRC representatives expressed a concern that this was a cursory review that might lead to false positives, that is, falsely assuming that the licensee has established a safety conscious work environment. There seemed to be a consensus that the resident inspectors might be in a better position to perform this assessment as part of the baseline inspections that they are assigned. Some industry representatives expressed a concern that NRC inspectors may not be trained to accurately assess this area and that this area is more subjective in nature, making it difficult to assess. There was also some discussion about whether this topic is really a separate cross cutting issue or is it just imbedded in a licensee's overall PI & R. The group agreed to continue discussion in this area at the next meeting.

Future activities

The group agreed to meet again in the February time frame to provide the feedback discussed above. Also, the group will begin to assess the data from the initial implementation of the revised reactor oversight process to evaluate what, if any, additional actions are needed to assess cross cutting issues.

ATTENDANCE LIST

<u>Name</u>	<u>Affiliation</u>
Jeffrey Jacobson	NRC/NRR
Jack Grobe	NRC/Region III
Juan Peralta	NRC/NRR
Rick Jacobs	INPO
Alex Marion	NEI
Tom Houghton	NEI
Mark Burzynski	TVA
Tom Foley	NRC/NRR
Robert Boyce	Excelon
James McCarthy	PPL
Sidney Crawford	Independent Consultant
Susan Yim	Winston & Strawn
Tom Boyce	NRC/NRR
D. B. Robinson	NPPD
Mary Ann Ashley	NRC/NRR
Gabe Salamon	PSEG Nuclear
Deann Raleigh	LIS
Michael Sontag	APS
Rodney Johnson	Detroit Edison
Paul Fredrickson	NRC/Region II
Wade Warren	SNC
William Dean	NRC/NRR
John Pellet	NRC/Region IV
Wayne Lanning	NRC/Region I
Richard Bickes	McGraw-Hill