

March 15, 2001

MEMORANDUM TO: Glenn M. Tracy, Chief  
Operator Licensing, Human Performance, and  
Plant Support Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

FROM: James L. Caldwell **/RA/**  
Deputy Regional Administrator

SUBJECT: REQUEST TO REVIEW SAFEGUARDS PERFORMANCE  
ASSESSMENT (SPA) PILOT PROGRAM IMPLEMENTATION  
RESOURCES

This is in response to your March 6, 2001, email, requesting acceptance from Division Directors/Deputy Regional Administrators for implementing the SPA pilot program. Your email indicated that each region would be tasked with conducting two SPA inspections and at least one OSRE. For planning purposes, Region III has chosen to examine the impact of two SPA pilot inspections and two OSRE inspections.

It is difficult to complete an accurate assessment of the specific impact this may have on other functions (baseline inspections, supplemental inspections, event response, and allegation effort) without knowing the scope of our SPA pilot inspection program effort, which is currently under development. Equating SPA assessment to a one week inspection by one regional inspector, as some have suggested, may not be accurate.

Because our safeguards allegation workload is smaller than last year, I believe it is possible to accommodate these inspections with our current staff. This appears consistent with discussions we have had with the other regions.

We do recommend consideration be given to planning some flexibility into the program completion requirements in the physical protection cornerstone to help absorb this extra work and to allow for other unforeseen effort. For example, it appears that our security plan change inspection workload is likely to increase, as licensees consolidate into new corporate structures.

The flexibility recommended could be provided by lengthening the inspection frequency of the other portions of the baseline inspection program should it become necessary. As an example, we could complete other baseline inspection activities in 14 or 15 months instead of 12, if necessary. Region III will endeavor to complete all of our inspection responsibilities as scheduled, however, we recommend you consider adopting a flexible approach to meeting deadlines between May 1, 2001, and May 1, 2002, to help accommodate potential unforeseen demands and this additional new effort.

CONTACT: James R. Creed, DRS  
(630) 829-9857

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Your email also requested feedback on the actual numbers proposed and the reduction in OSRE. Two seems to be the optimal number of SPA inspections during the pilot program and we believe maintaining the current OSRE schedule is desirable, if possible. From a public perception standpoint, providing us the flexibility to extend one portion of the inspection program, if necessary, to accommodate this work demonstrates our resolve to place a higher priority (for this inspection cycle only) on inspection effort that has a slightly higher risk, and much higher public scrutiny (Contingency Response).

cc: J. Wiggins, DRA/RI  
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V. L. Ordaz, NRR