

April 26, 2001

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

FROM: A. Randolph Blough, Director */RA by R.V. Crlenjak for/*
Division of Reactor Projects
Region I

SUBJECT: REGION I COMPLETION OF ROP1 AND IMPACT OF INDIAN
POINT 2 INSPECTION AND ASSESSMENT EFFORT

The initial implementation (first year) of the Reactor Oversight Process (ROP) ended on March 31, 2001. Excepting one case where Indian Point 2 (IP2) activities forced schedule adjustment, Region I completed the annual requirements of the ROP at all 19 sites in the region. Region I's efforts were severely challenged and impacted by the concurrent need to perform additional inspection and assessment activities, as well as an enormous workload in communicating with external stakeholders, in the oversight of IP2. The performance of the baseline portion of the ROP at all 19 sites during the same inspection year required a particular discipline with respect to inspection scheduling and staffing. While Region I received excellent support and assistance from NRR and the other regions when it came to IP2 activities, the priority given to accomplish that work strained the region's ability to complete the ROP elsewhere in the region. Most notably, giving priority to IP2 activities caused a "ripple effect" on regional inspection planning which resulted in an ongoing challenge to inspection staffing and adequate inspection preparation time.

When considering Region I's completion of the ROP, both the quantitative and qualitative natures of the program need to be addressed. As previously stated, Region I generally satisfied the quantitative requirements of the ROP. The one exception to full completion of the ROP at all Region I sites involved the 71111.02 inspection at Limerick. This inspection was scheduled to be performed late in the ROP1 cycle but was delayed when the inspector was diverted at the last minute to an essential IP2 activity. The inspection could not be made up before the close of ROP1 due to a licensee outage and concerns about regulatory impact; it has been rescheduled for early in the ROP2 cycle. The deferral was considered appropriate from a safety perspective based on the other inspection activities completed at Limerick and was required to accommodate schedule perturbations that resulted from IP2 activities. That there was only one case where an inspection had to be deferred can be attributed to the region's careful and continuous efforts in monitoring and controlling resources while following the process to ensure program completion as well as managing the demands of IP2 activities.

The demands imposed by IP2 certainly affected the qualitative aspects of Region I's completion of the program at the other sites. The impact of these IP2 activities on other

regional activities was most significantly felt in the area of ROP inspection scheduling. Extra stress was placed on the IP2 resident staff by the competing priorities of performing ROP baseline inspections versus other important emergent work. Regarding the impact on the region's ability to accommodate the priority given to IP2 activities, several previously scheduled inspections at other Region I sites had to be postponed and rescheduled. This caused a significant impact, primarily on the DRS specialist inspectors, and especially the emergency preparedness (EP) staff, and their supervisors who were still responsible for completing their inspections at all Region I sites during the ROP inspection year. The "ripple effect" caused by IP2 activities was similarly experienced by all five DRS branches. In some cases, the impact has reached into the second year of ROP implementation. The ripple caused in the ROP1 schedule has caused Region I to postpone fire protection and PI&R inspections desired early in ROP2 to later in that ROP cycle. The impact of IP2 will be a continuing challenge on Region I's ability to properly complete the expectations of the shortened ROP2 cycle.

The following paragraphs further describe the extra-baseline activities required for IP2 and their subsequent impact on other Region I efforts:

The direct inspection effort at IP2 far exceeded what is considered the norm for one ROP inspection year. In addition to completing the ROP baseline inspection effort at IP2, several types of other inspections were also required. Over 4,900 hours were spent in direct inspection effort at IP2 during ROP1, while other Region I single-Unit sites averaged approximately 2,000 hours. The most extensive above-baseline effort at IP2 was the IP95003 supplemental inspection, which provided the needed diagnostic-nature inspection of IP2.

Additionally, many IPE Code "OA" inspections were conducted throughout the year as followup to previously performed special and supplemental inspections. Principle among these were inspections of the steam generator failure root cause and the extensive inspection required before plant restart. As you are aware, numerous issues existed or arose which required inspections as restart was approached. Because IP2 was in the multiple degraded cornerstone column of the action matrix and the licensee was conducting their own performance improvement plan it was essential that substantial sampling of restart issues be performed. Much of this effort was needed to address numerous specific degraded conditions and design control issues which could impact on equipment operability. This extra inspection effort was vital to the Agency's ability to verify that the licensee's performance had reached an acceptable level prior to restart. (It was a close call to not perform our oversight of restart activities in accordance with MC0350. We believe that the process we used was a rigorous one that accomplished the goals of this manual chapter. If we would have been required to fully implement MC0350, we believe significant additional effort would have been necessary.)

Beyond the additional inspection efforts, there were significant public, media, government, and special interest interactions associated with the IP2 effort. There was a large increase in the number of allegations and the associated response effort. Further, there was a need for a substantive effort in the area of recapturing and analyzing the IP2 50.54(f) submittal information and engineering inspection history. Also, over the year of the ROP, nine local public meetings were held, plus several additional regional meetings and site visits, most attracting heavy local and regional press interest. The NRC was also required to respond to over 50 "green ticket" requests. Other extra-baseline activities, such as conducting NRC commissioner briefings or plant tours, added additional burdens to the NRC IP2 staff. An analysis of RITS PA codes provides an indication of the extra effort required at IP2: the prep/doc (BIP & BID) hours at IP2

were over 67 percent higher than the average of other regional single-unit sites; the assessment and significance determination (ASM & SDP) hours were over 500 percent higher; and the inspection support (COM, REG & AT) hours were over 530 percent higher. Finally, changes to the normal regional management organization were required to support the additional workload and elevated priority associated with IP2 activities. The DRS Deputy Director was assigned as a dedicated SES manager of the project, which further included a dedicated GG-15 branch chief, GG-14 senior project engineer, and GG-13 project engineer. This need for an SES dedicated to the IP2 project will likely continue for 4-6 months longer. We therefore expect to be requesting some temporary management or supervisory help from headquarter offices soon.

The impact of the IP2 efforts presented additional challenges to the region in qualitative areas, such as inspector preparation time and inspector assignment and team synergy. For example, we know the new program relies on preparation time for inspectors to gain risk insights and select the proper inspection samples. Although there is no direct measure of how the shifting and compression of the ROP1 inspection schedule affected inspector preparation time, it is clear to us that inspector preparation time was negatively affected. Similarly, inspection personnel changes were made at the last minute to accommodate the schedule changes, negatively affecting optimal inspector assignment and team synergy. As a follow-on effect to inspection schedule changes, there was an additional negative effect on inspector leave and training activities.

In summary, Region I is proud of its effort in satisfactorily completing the requirements of the ROP in the first year of its implementation. The concurrent challenges of providing the proper level of oversight at Indian Point 2, however, posed a significant challenge to our pursuit of excellence in ROP implementation. The additional employee time extracted to satisfy the IP2 efforts was equivalent to the inspection effort of approximately one-and-a-half additional single-unit sites. We urge NRR to consider these impacts on regional efforts for future refinement of the ROP. Finally, Region I has gained an expertise in managing the oversight efforts required for a plant in the multiple degraded cornerstone column of the MC0305 Action Matrix. We are anxious to share our insights with your staff at an appropriate future time. If you have any questions concerning the information or ideas presented in this memorandum, please do not hesitate to contact me.

William M. Dean

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