

From: Doug Coe *NRF*
To: Gareth Parry; Peter Koltay; Peter Wilson; Steven Long; Timothy Frye *NRF*
Date: 3/7/01 7:04AM
Subject: Re: How to handle SDP for concurrent reactor safety inspection findings

Thanks Gareth, we'll massage it and get back to you.

Other comments are welcome. I expect to ask for SPSB concurrence on this, so now is the time to get your oar in the water!

Doug

>>> Gareth Parry 03/06/01 10:29AM >>>

Doug:

I think some of what you wrote is ambiguous, at least it is to me. I've tried to edit what you wrote, but also indicate where clarification is needed.

>>> Doug Coe 02/23/01 12:57PM >>>

When licensee performance deficiencies cause multiple equipment or functional unavailabilities that are concurrent (i.e., partially or wholly overlap in time), the SDP should be applied in the following manner. All such multiple unavailabilities should be written as a single inspection finding to be processed ~~together~~ through the SDP. The color of this single finding will be the most significant color for any time period during which either single or multiple unavailabilities occurred. **[This is not at all clear. Are you suggesting that, to address multiple overlaps, for example, AB, AC, CB, ABC, you pick the combination with the highest to put into the action matrix? Or are you suggesting that the time history of the unavailabilities be documented, e.g., A for X hours, AB for the next 14, ABC for 1, etc., and associate the colour with say ABC if that short interval happens to be the worst?]** If this finding is determined to be of White or greater significance, then it will be input into the Action Matrix regardless of whether any of the individual unavailabilities have been previously processed through the SDP. **[Again, I'm not clear what this means. Is this to handle the case where you discover at some time that there exists an issue (#2) that has been ongoing and in fact was an issue at the time another issue (#1) was raised, but this new issue hadn't been identified at the time the finding on issue #1 was put into the matrix? I guess this is now valid if what you are doing is checking for the common cause potential]** The documentation of the basis for the final significance determination must make clear the *relative* (?) contributions from each of the unavailabilities, individually and combined, such that any supplemental inspection focus will be risk-informed. **[Sorry, not clear again. You can certainly assess the significance of each unavailability individually using the SDP with the assumption of independence of the findings (i.e., don't put in the other unavailabilities), and then work out the contribution from the combined unavailability. I'm not sure what you mean by relative contributions though. Isn't it the absolute contributions we need?]** Also, any supplemental inspection that is conducted in response to this finding should carefully examine all of the multiple unavailabilities to determine if they have revealed a common cause failure potential. **[Shouldn't this be the focus of the additional inspection? Leading the sentence with 'Also' makes it seem like an afterthought]**

Gareth

J/67