

From: Jack Strosnider, *NRF*
To: Doug Coe, F. Mark Reinhart, Frank Gillespie, Ma... *NRF*
Date: Wed, Nov 15, 2000 11:22 AM
Subject: Re: Fwd: DRAFT - IP2 Red Finding & NOV

I just want to point out that there are two actions in the integrated steam generator action plan that is currently in concurrence that are related to the discussion, below. Item # 9 is to determine if new PIs for steam generators should be put in the oversight process. The starting point for this should be the proposal that DE and DSSA made to DIPM. The driving force is to make the PIs consistent with the PIs established in the NEI 97-6 regulatory framework. The other two items in the action plan are #'s 11 and 13 which have to do with reviewing the inspection program and making appropriate modifications. Bottom line is that the purpose of the integrated action plan is to capture issues like this, and it should serve as the focus for going forward.

Jack

>>> Frank Gillespie 11/15 9:49 AM >>>

IT may be time to relook at it but PI's are not a substitute for reporting requirement. The question should also be are we happy with the tech spec that forms the basis of the current leakage PI. If the problem is the tech spec then that needs to be fixed. The oversight PI's are not a replacement for data and requirements on the licensee needed to ensure safety. They are an indication of off normal performance which may have as one cause a failed program. As I understand it, a lot of the practices in SG space like following the EPRI guidance on background noise is not necessarily mandated. It seems we may be trying to avoid the correction of requirements including report needs by saying lets have a PI. Why not lets have a post inspection report with the right content and review it and fix the NRC inspection program to look at the right attributes while the work is going on. By focusing inspection we also focus licensees as like it or not our inspection procedures are used as guidance documents by licensees for these types of functions. In a perfect world we would write a reg guide for licensees to reference and the inspection procedures to follow. The sequence would be fix the requirements, fix the guidance, inspect or measure(PI) the implementation. If the leakage rate in the tech spec should be reduced and we did that then the PI would follow. This worked at IP the leakage PI went yellow and the plant took the appropriate action. The inspection follow up occurred and the red finding resulted and the plant is down replacing SG's. Public protect was successful. If our new standard is higher than what happened we need to make the new standard known and required. If no leakage or reduce leakage is needed lets go through rulemaking. We should not ratchet through oversight.

>>> Richard Barrett 11/13 8:06 AM >>>
Folks:

Doug's suggestion is a great idea. However, I wonder if we could consider an alternative approach. Rather than going through this detailed analysis every time we have a steam generator issue, could we instead define an indicator that, more or less, automatically tells us the significance of a steam generator performance problem? DE and DSSA took a stab at defining such an indicator earlier this year. Is it now time to discuss finalizing it?

--Rich

>>> Doug Coe 11/13 7:52 AM >>>

We need to capture/institutionalize the staff review precedences set by this action.

Steve Long's review of the licensee's SGTR risk analysis might be a good start for a "Standard Review Plan" for staff review of licensee SGTR PRA's. This could form the beginnings of a general PRA review "SRP", so as to begin to capture a complete and consistent review approach for future such reviews. Such a document would also have implications for the PRA standard-setting activities currently bogged down with ASME.

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