

COMMENT RESOLUTION (3<sup>rd</sup> QUARTER 2001)  
IMC 2515 and APPEND A

Source	Comment	Added	Resolution
IMC 2515			
R-I	None		
R-II	Section 09: In the list of factors to consider when making alterations to the baseline inspection program, consider adding the plant's assessment and where it is on the Action Matrix.	No	Performance was originally a factor. The flexibility focus group (DRP and DRS directors) removed it.
R-II	Section 11.01: Recommend to consider the definition of deep backshift to include licensee holidays since licensee management is at a minimum during those days.	No	The guidance specifically excludes those days because they are days and times when the licensee expects the NRC to be on site.
R-II	<p>Section 12.01: 1st Paragraph: Recommend adding the following sentence (or similar) to clarify that only inspection report information is to be discussed at the exit:</p> <p>"At the conclusion of an inspection, inspectors must discuss their preliminary findings with the licensee's management at a scheduled exit meeting. <u>The issues discussed at these exit meetings should only be those findings that are proposed to be documented in an inspection report.</u> Management and exit meetings with licensee personnel should be scheduled to have the minimum impact on other licensee activities necessary to assure the safe operation of the plant."</p>	No	We don't want to restrict the communications between inspectors and the licensees. We expect inspectors to discuss both findings and those other observations the licensee wishes to hear. That can be at the exit, after the exit, or at other meetings during the inspection.

COMMENT RESOLUTION (3<sup>rd</sup> QUARTER 2001)  
IMC 2515 and APPEND A

Source	Comment	Added	Resolution
R-II	<p>Section 12.01: 3rd Paragraph: Recommend adding the following sentence (or similar) to clarify that any non-report information presented to the licensee must be communicated prior to the exit.</p> <p>“Many licensees have expressed the desire to hear inspector insights related to safety/regulatory performance even in instances where they do not reach the threshold for documentation in an inspection report (see IMC 0610*, "Reactor Inspection Reports"). <u>Inspectors must ensure that these observations, to include minor violations, are communicated to the licensee as they are identified during the inspection period, and prior to the exit.</u> When deciding which observations and insights to pass on to the licensee, inspectors should consider the following:”</p>	No	The paragraph's first sentence states that observations are to be communicated during the inspection.
R-III	None		
R-IV	None		
IMC 2515 APPENDIX A			
R-I	None		
R-II	None		
R-III	None		
R-IV	None		

Comment Resolution

COMMENT RESOLUTION 9/20/01  
IMC 2515 Appendix D, "Plant Status"

Source	Comment	Added	Remarks
RI	No comments		
RII	Add a resource estimate for single, dual, and triple units.	No	A resource estimate is not included in manual chapters, only in inspection procedures. By design, a manual chapter establishes high level policy, not specific inspection requirements
RII	Improve the consistency of the guidance regarding the frequency for performing Plant Status inspections. Recommend rephrasing the more specific frequency prescriptions in favor of a broader frequency based on licensee activities and performance.	No	The frequency of plant status activities varies to focus more time on those activities that provide the most useful insight regarding plant status. The more specific frequency guidance also improves consistency of implementation.
RII	Add "operator work-arounds" and refer the inspector to the appropriate baseline inspection to pursue issues in this area.	Yes	Adds useful information of a general nature.
RII	Move the sentence regarding the purpose of plant tours to the first paragraph	Yes	
RII	Add qualifiers within the procedure to clarify the extent of inspection activities, such as change "tour accessible areas.." to "tour selected accessible areas..."	No	The use of qualifiers is considered to be overly detailed and prescriptive for a manual chapter. However, the specific example cited was modified to improve clarity.
RII	Modify the plant tour guidance from observing "equipment in an abnormal lineup" to observing "equipment in a safety significant or risk significant abnormal lineup."	No	Inspectors have already been advised to use plant specific risk information to determine what systems and activities are of higher risk significance in Section A, "Objectives and Philosophy of Plant Status Activities."
RII	Add a reference to the fire protection baseline inspection when fire protection issues are identified.	Yes	This is useful information and consistent with other guidance in the manual chapter.

Source	Comment	Added	Remarks
RIII	To the list of information to review in the control room, add “plan of the day activities involving maintenance, surveillances, calibrations, etc.”	Yes	This is useful guidance of a general nature.
RIV	No comments		

COMMENT RESOLUTION 9/26/01  
IP62710 Power Operated Gate Valves

Source	Comment	Added	Remarks
Region I	Questioned the resource estimate of 4-30 hours		This estimate is broad because only parts of the procedure may be implemented depending on the circumstances
Region II	Suggested adding an inspection requirement to review PI & R reports related to pressure locking and thermal binding	X	
Region II	Suggested adding statement regarding the need to obtain copy of the SER	X	

COMMENT RESOLUTION [9/25/01]  
71111.01, "Adverse Weather Protection"

Source	Comment	Added	Remarks
RI	No Comments	N/A	
RII	Effects from such external factors as mussels, clams, swamp grass, etc. are seasonal and not necessarily weather related. As such, they should be included in the heat sink procedure (71111.07) rather than the adverse weather inspection procedure.	Yes	Agree. This is already in 71111.07 procedure. Revised Section 01-02 to delete reference to mussels, clams, swamp grass, etc. as seasonal susceptibilities.
RII	Section 02.01c - Have the inspector verify that minimum/adequate operator staffing is specified in adverse weather procedures. A similar requirement should be developed in Section 02.02 to verify minimum/adequate operator staffing exists for "impending" adverse weather. Additional staff needed for "routine" cold weather would be an operator workaround issue (71111.16) and not necessarily relevant to this attachment.	Yes	Added inspection requirement in 02.02.b.
RII	Section 02.02b - Revise as follows - The Enforcement Policy provides for the exercise of enforcement discretion under circumstances in which maintaining the stability and reliability of the electrical power supply system is consistent with protecting the public health and safety. Weather-related NOED requests usually involve a missed surveillance, an improperly scheduled surveillance, or inoperable equipment. Verify that required surveillances are current, or are scheduled and completed ( <u>if practical</u> ) before anticipated extreme weather conditions develop. Verify the licensee implements periodic equipment walkdowns ( <u>if practical</u> ) or other measures to ensure that the condition of plant equipment is good and that potentially inoperable equipment does not prompt a NOED request.	Yes	Comments incorporated

COMMENT RESOLUTION [9/25/01]  
71111.01, "Adverse Weather Protection"

Source	Comment	Added	Remarks
RII	Section 02.03- Revise as follows - <u>Identification and Resolution of Problems</u> . Verify whether the licensee is identifying weather related problems that could affect mitigating systems and their support systems in the licensee's corrective action program and verify that they are properly addressed for resolution. <u>After an adverse weather event</u> , review the historical corrective action database to identify trends and to determine whether corrective actions have been effective. History searches of adverse weather events as well as specific weather effect mitigation equipment (e.g. heat trace circuits, intake structure traveling screens, station chillers, heat exchangers, etc.) may be useful. Review the station's self assessments or audits for adverse weather readiness. See Baseline Inspection Procedure 71152, "Identification and Resolution of Problems," for additional guidance.	No	Historical corrective action database review is required to determine whether corrective actions have been effective. The comment suggests that you need to review this only after an adverse weather event.
RII	Section 03 -Under mitigating systems, revise the inspection objective as follows "Inspect for the ability of the selected mitigating system or component to perform its design function under projected <del>worst case</del> adverse weather."	Yes	Comments incorporated
RIII	No Comments	N/A	
RIV	Incorporate minor editorial comments	Yes	Comments incorporated

Source	Comment	Added	Remarks
RIV	In Section 71111.01-02, 02.02 b. - NRC Regulatory Issue Summary 2000-15, <b>recommends</b> that the licensee ensure surveillances are current, or scheduled and completed before the anticipated extreme weather conditions develop. It recommends that the licensee implement periodic walkdowns to ensure that equipment conditions are good and that potentially inoperable equipment does not prompt an NOED request. How can we verify these actions are taken if they are not required?	N/A	There is no regulatory requirement to verify these actions, but the licensee may be required to take these actions based on their procedures. However, from a risk perspective, these actions are required to maintain the stability and reliability of electrical power supply.  See Region II Comments above.



**COMMENT RESOLUTION (September 6, 2001)**  
**IP 71111-02 - Inservice Inspection Activities**

Source	Comment	Modification	Remarks
<b><i>REGION I COMMENTS (MEMORANDUM dated 8/28/01 from Cliff Anderson)</i></b>			
Comment #1	<p><b><u>IP 71111.02, “Evaluations of Changes, Tests, and Experiments”</u></b></p> <p>In the paragraph describing the Level of Effort, the last word “respectively” needs clarification. Are the sample sizes (6-8; 10-15) unit dependent? “Respectively” implies two sets of three numbers (e.g., 6, 7, 8 for 1, 2, 3 unit sites, respectively). The hour allocation in the Resources section also need further clarification.</p>	The intent of comment was incorporated into IP.	<p>The sample sizes in Level of Effort were revised to make its dependence on the number of units at a site more obvious which is in agreement with the original intent of this procedure.</p> <p>The hours in the Resources section were revised to make them agree with sample sizes in Level of Effort.</p>
Comment #2	<p>Section 01.01: I don’t think this clarification adds value. It exists in the 10 CFR 50.59 definition section, as does the definition of changes to facility/ procedures as described in the FSAR.</p>	The comment was not incorporated into IP.	<p>The sentence in question in Section 01.01 was revised to state “To verify that changes to tests or experiments not described in UFSAR (for example a SSC utilized in a way either outside the design basis or inconsistent with the safety analyses), and changes to the facility or procedures as described in the UFSAR, are reviewed and documented in accordance with 10 CFR 50.59.</p>

Source	Comment	Modification	Remarks
Comment #3	<p>Section 02.01 <u>Inspection Sample Selection</u>: rewrite paragraph (a) as follows:</p> <p>Review the list of evaluations performed by the licensee and select the number of completed evaluations as stated in the Level of Effort above, choosing samples from different cornerstones and based on risk significance from the following :</p> <ul style="list-style-type: none"> <li>• tests or experiments not described in the UFSAR;</li> <li>• changes to the facility;</li> <li>• changes to procedures; and</li> <li>• changes to the UFSAR.</li> </ul> <p>Include in the selection evaluations associated with calculations, procedure revisions, modification revisions, and non-routine operating configurations.</p>	Comment partially incorporated into IP.	Section 02.01a. was revised to list the sources of completed evaluations to be reviewed in implementation of this IP. However, 'changes to the UFSAR' includes 'changes to facility and to procedures', not specifically 'changes in method of evaluation' since the later is included in 'changes to facility and procedures' as defined in 10 CFR 50.59, Section (a)(1). Therefore the list should only include 'changes to facility', 'changes to procedures', and 'changes in test and experiments'.
Comment #4	<p>Section 71111.02-05 References: Add the following documents to this section:</p> <ul style="list-style-type: none"> <li>• 10 CFR 50.59</li> <li>• NRC Regulatory Guide 1.187, " Guidance for Implementation of 10 CFR 50.59, Changes, Test, and Experiments," rev. Nov 2000.</li> <li>• NEI 96-07, Revision 1 (Nov 2000), Guidance for 10 CFR 50.59 Implementation.</li> </ul>	Comment incorporated into IP.	The additional references were added to Section 71111.02-06, "References".

Source	Comment	Modification	Remarks
Comment #5	<p>Additional Comments: In the July 19, 2001, letter describing the proposed changes, it indicates the biennial requirement offers the opportunity to coincide this inspection with SSDI inspections. This is not identified in the procedure. Also, if this is done coincident with the SSDI (assuming the Permanent Plant Modification procedure is done on alternate years), 50.59's essentially remain an annual inspection since several 50.59 safety evaluations and screens are done as a routine during a plant modification inspection. This procedure may be better served to be coincident with IP 71111.17, Permanent Plant Modifications. That would ensure a thorough and true biennial inspection. Finally, this procedure should clearly identify which (if any) other engineering inspection that this should be performed with.</p>	The intent of comment was incorporated into IP.	An additional step was added under General Guidance to indicate that this IP should be performed in conjunction with IP 71111.17 on a biennial basis if possible.

Source	Comment	Modification	Remarks
<b><i>REGION II COMMENTS (MEMORANDUM dated 8/22/01 from Leonard Wert)</i></b>			

Source	Comment	Modification	Remarks
Comment #1	<p>IP 71111.02, "<u>Evaluations of Changes, Tests, or Experiments</u>"</p> <p><b>Specific Comments:</b></p> <p>Section 02.01a      Does not include changes to methods of evaluation. Suggest adding "methods of evaluation" after "procedures".</p>	Not incorporated	<p>Section 02.01a. was revised to list the sources of completed evaluations to be reviewed in implementation of this IP. However, 'changes to the UFSAR' includes 'changes to facility and to procedures', not specifically 'changes in method of evaluation' since the later is included in 'changes to facility and procedures' as defined in 10 CFR 50.59, Section (a)(1). Therefore the list should only include 'changes to facility', 'changes to procedures', and 'changes in test and experiments'.</p>
<b>REGION III COMMENTS(MEMORANDUM dated 8/27/01 from James L. Caldwell)</b>			

Source	Comment	Modification	Remarks
Comment #1	Modify the Level of Effort sentence to delete reference to the number of units. The level of effort for this procedure does not change for a single, dual, or triple unit site. This conclusion was derived from completion of the 10 CFR 50.59 inspections to date at Region III sites. No difference in effort was expended based on the number of units, however, differences in effort were necessary based on the number of changes made to the facility.	Comment not incorporated into procedure.	<p>The Level of Effort was previously designated to vary with the number of units at a site.</p> <p>Some preliminary inspection results indicate otherwise but that is insufficient data at this time to warrant a change in the original basis for the derivation of the Level of Effort.</p>
<b>REGION IV COMMENTS (EMAIL dated 9/06/01 from Phillip Harrell)</b>			

Source	Comment	Modification	Remarks
Comment #1	IP 71111.02, "Evaluation of Changes, Tests or Experiments" - The level of effort revised text states that 6-8 safety evaluations and 10-15 safety evaluation screenings should be reviewed at a 1, 2, or 3-unit site, respectively. This is ambiguous because numbers are not provided to correspond directly to the use of the word "respectively." It could be interpreted that it's alright to look at only 6 safety evaluations and 10 screenings at a 3-unit site. Alternately, it could mean that 6, 7, or 8 safety evaluations and 10, 12/13, or 15 screenings should be reviewed at a 1, 2, or 3-unit site.	Comment corporated into this IP.	<p>The sample sizes in Level of Effort were revised to make its dependence on the number of units at a site more obvious which is in agreement with the original intent of this procedure.</p> <p>The hours in the Resources section were revised to make them agree with sample sizes in Level of Effort.</p>
Comment #2	02.01.a (fourth line) - There is a missing "the" before "USAR" and "facility.	Comment not incorporated into this IP	This section has been rewritten so these grammatical errors no longer apply.

COMMENT RESOLUTION [10/1/01]  
71111.04, "Equipment Alignment"

Source	Comment	Added	Remarks
RI	None.		
RII	None		
RIII	Modify sentences in LOE, Sections 71111.04-02, and O2.01.a as suggested.	Yes	Revised Sections LOE, 71111.04-02, and O2.01.a
RIII	a. Delete "potential" from Section 02.03.c.	Yes	Incorporated
	b. Clarify relevance to IP 71111.14 in Section 71111.04-03	Yes	Deleted reference to IP 71111.14
RIV	Incorporate minor editorial comments	Yes	Incorporated
RIV	If the intent of the new IP 71111.04 is to open the inspection to partial walkdowns of any risk-significant system, then the original intent of the procedure has been changed without any explanation as to why the change is being made.	N/A	The original intent of the procedure has not been changed. We clarified the inspection requirements and guidance based on the feedbacks received from other Regions. See Section 04.03 for clarification.



COMMENT RESOLUTION [9/24/01]  
71111.06, "Flood Protection Measures"

Source	Comment	Added	Remarks
RI	As written, the revised procedure will overly emphasize the inspection of underground bunkers. I recommend including underground bunkers along with the other inspection attributes already listed in the procedure. This would maintain flexibility for the inspector to allocate inspection resources to the most risk significant attributes at his particular plant.	No	This is an important area to focus because of the potential for common cause failures. Section 02.02.b has been revised to provide more flexibility to the inspector.
RII	In Section 02.01.a, Recommend providing examples of "seasonal susceptibilities"	Yes	Comments incorporated
RII	In Section 02.01.b, Change the first sentence to read "Based on licensee flooding risk studies....." Change the last sentence to read ".... sources to assist in scheduling this inspection to be performed prior to the season ...."	Yes	Comments incorporated
RII	In Section 02.02.a, Recommend to add "Inspect condition and availability of temporary or removable flood barriers (i.e., gaskets)."	Yes	Comments incorporated
RII	In Sections 02.01.b and 02.02.d, Is the intent to inspect external flooding ONLY as needed? If so, would it be possible to not do any external flooding inspection in an assessment period if conditions or seasonal susceptibilities do not require it? When it is required to be done, is the intent to only pick one risk significant area to inspect as noted in 02.01.b, or to assess the overall site condition and readiness as 02.02.d seems to imply?	Yes	NO. Revised to read at least annually.  For internal flooding, inspect 1-2 pant areas semi-annually.  For external flooding , inspect all protection features for the site.
RII	In Section 02.01, the IP could become repetitive over several cycles - the same areas will always come up as risk significant for internal flooding. Much efficiency would	No	There is no need to put any guidance in the procedure. Inspectors should use their judgement.

Source	Comment	Added	Remarks
	be gained if 02.01 directed the inspector to consider previously inspected areas and consider selecting another risk significant, but previously not inspected, area.		
RII	For internal flooding, is the intent to do one sample approximately every six months? If so, is the one sample supposed to be just the one area chosen per 02.01.b plus the bunker/manholes and procedures per 02.02.b and c?	N/A	For internal flooding, inspect 1-2 pant areas semi-annually. Review b and c if they apply to the selected areas.
RIII	No Comments		
RIV	Inspect the licensee's program for ensuring that sump level instrumentation, pumps, and so forth are properly calibrated maintained	No	Program review is not part of the baseline inspection program. However, review of calibration and maintenance of some of the equipment is mentioned in the procedure.

**COMMENT RESOLUTION (October 1, 2001)**  
**IP 71111-07 -Heat Sink Performance**

Source	Comment	Modification	Remarks
<b><i>REGION I COMMENTS (MEMORANDUM DATED 8/28/01 from Cliff Anderson)</i></b>			
Comment #1	<p>The changes to the procedure were excellent in that they addressed the concerns for the annual resident inspection. Specifically it addressed the multiple ways a licensee may address heat exchanger performance (testing, biofouling controls and cleaning, etc.).</p> <p>Paragraph 02.02.b, modify the 3rd item to address fouling and cleaning of the ultimate heat sink.</p> <p>“3. When implemented, verify that chemical treatments, tube leak monitoring, methods used to control biotic fouling corrosion (such as shells, seaweed, corbicula, and microbiological induced corrosion) <b>and methods to control macrofouling (silt, dead mussel shell, debris, etc.) at the ultimate heat sink</b> are sufficient (i.e., <b>appropriate acceptance criteria</b>) to ensure required heat exchanger performance <b>and ultimate heat sink availability.</b>”</p> <p>At Seabrook during the biennial inspection, inspectors identified a Green Finding associated with an excessive amount of silt and debris near the service water pump suction in the intake structure (See Inspection Report 01-07).</p> <p>Although identified during periodic cleaning, acceptance criteria were not developed for the period measurement nor did engineers recognize and identify the condition adverse to quality.</p>	Comment was incorporated by revising the IP as applicable.	Section 02.02b. was revised as indicated in the comment to include control of macrofouling and to indicate that a relevant acceptance criteria was the way to accomplish that end.
<b><i>REGION II COMMENTS (MEMORANDUM DATED 8/22/01 from Leonard Wert)</i></b>			
Comment #1	<p><u>71111.07, “Heat Sink Performance”</u> Section 2.01</p> <p>References EPRI guidance. Is the EPRI guidance, which is licensed, available from an internal NRC source? If so, the source should be indicated.</p>	Not incorporated in IP but comment was addressed.	<p>The guidance documents can be obtained from EPRI’s web only by the NRC library located in headquarters.</p> <p>The non-proprietary versions are</p>

Source	Comment	Modification	Remarks
			<p>acceptable. If you are FOIA'd, remember the proprietary nature of these documents.</p> <p>The library will provide electronic files which can be emailed to the branch chiefs in the regions for distribution to their respective staff.</p>
NRC	<p>Section 2.01</p> <p>Indicates ..."Select a heat exchanger [HX] that transfers heat directly or <b>indirectly</b> to the safety-related [s-r] service water system....." The GL89-13 and the EPRI guidance indicate, "... exchangers <b>cooled by service water.</b>" There is a conflict present here in that RHR [exclusive of BWRs and some odd PWRs] and other risk significant cooling devices are not cooled by service water directly and some are not cooled by service water at all [many plants have direct water sources such as potable or others as "diverse" backup]. The other cooling water sources are risk significant sources and are found in the cutsets of the PSAs and PRAs. To add to the confusion, many plants follow the strict interpretation of the GL and EPRI and do <b>not inspect nor test</b> their RHR Hxs because they are not directly cooled by service water. There needs to be written direction for the inspectors to follow when confronted by the RHR non-inspection nor test situation. There needs to be clarification, such as a definition, on what is a cooling device in risk space (seal coolers, gear coolers and pump seal packages that do not have typical Hxs. There needs to be written direction regarding other significant cooling water sources.</p> <p>Section 2.02. a</p>	Comment incorporated into IP.	<p>Section 02.01 was revised to address only heat exchangers which transfer heat directly to the safety-related service water system in accordance with GL 89-13.</p> <p>Section 02.02 was subdivided into subsections that addressed inspection activities both individually and in combination for heat exchanges indirectly and directly cooled by service water system. In addition specific guidance was developed to better inform inspector what to do in non-inspection and non-test situations and also what to do when confronted with alternate water sources.</p>

Source	Comment	Modification	Remarks
	Discusses "closed cycle cooling systems." It does not have the words "transfers heat directly or indirectly" to the service water system. Revisions to the annual review paragraph should also clarify this biennial section.		
	<p>2.0.2b</p> <p>This section has been expanded from simply inspecting heat exchangers to inspecting the broader aspect of the entire "heat sink" including pumps, intake screens, piping, valves. The concept is ok; however, the specific guidance contained in the IP continues to focus the inspector only on verifying heat exchanger testing and cleaning. The IP should provide a more balanced perspective of the intended aspects to verify. For example, the following may be verified: heat sink reservoir capacity, heat sink separation/isolation tests, third party dam inspections, pump and valve performance tests, piping corrosion problems,</p>	Comment incorporated into IP.	Section 02.02d was added to specifically address what to inspect for heat sinks and their related subcomponents.
<b>REGION III COMMENTS (MEMORANDUM DATED 8/27/01 from James L. Caldwell)</b>			

Source	Comment	Modification	Remarks
Comment #1	Several places in the procedure refer to the use of EPRI NP-7552, "Heat Exchanger Performance Monitoring Guidelines." While this appears to be a good reference to use when performing this inspection, many sites may not have access to the EPRI document. It would be prudent to furnish this EPRI document to all resident sites or provide information as to how inspectors may obtain this document electronically.	Not incorporated in IP but comment was addressed.	<p>The guidance documents can be obtained from EPRI's web only by the NRC library located in headquarters.</p> <p>The non-proprietary versions are acceptable. If you are FOIA'd, remember the proprietary nature of these documents.</p> <p>The library will provide electronic files which can be emailed to the branch chiefs in the regions for distribution to their respective staff.</p>
<b><i>REGION IV COMMENTS(Email dated 9/06/01 from Phillip Harrell)</i></b>			

Source	Comment	Modification	Remarks
Comment #1	<p>In Section 02.02.b (seventh line) - Add to end "and transfer heat at a specified rate."</p> <p>In Section 07-04 (Resource Estimate) - Consider changing the resource estimate from 34 to 46 hours down to 30 to 42 hours. This reduced estimate would better accommodate a one-inspector effort at distant sites where inspection time is limited due to the associated increased travel time (i.e., Columbia Generating Station). Otherwise, the inspection will require an additional inspector, weekend travel, or overtime. We believe that the specified scope of the inspection does not warrant increasing the resource estimate to constitute a two-person inspection effort.</p>	Comment not incorporated	<p>The hours in this IP are merely estimates of the level of effort involved to implement the inspection activities indicated in the IP.</p> <p>The level of effort is dictated by implementation of the risk-significant inspection activities for the suggested sample sizes not by the estimated resources or travel considerations to distant sites.</p>

COMMENT RESOLUTION [10/2/01]  
71111.15, "Operability Evaluations"

Source	Comment	Added	Remarks
RI	Clarify that specialist assistance for the review of complex issue should be charged to the operability procedure.	Yes	Comments incorporated
RII	Need clarification to section 02.01.a regarding conditions warranting an operability evaluation	Yes	Comments incorporated
RII	Change Section 02.01.b second sentence to say "Verify that the licensee considered other degraded conditions and their impact on compensatory measures for the condition being evaluated."	Yes	Comments incorporated
RII	Change first sentence in Section 03-01 to read "---- verification of operability by surveillances <i>and continuous monitoring of plant systems</i> . Formal determinations of operability <i>are performed</i> whenever—"	Yes	Comments incorporated
RII	Last sentence: Sentence not necessary. Guidance already directs that approximately 10% of the allotted effort should be looking at PI&R. Don't necessarily need to do extra PI&R just because there are not enough problems to give us enough operability evaluation samples. Performance of operability evaluations when warranted is reviewed by 02.01 a.	Yes	Comments incorporated
RIII	No Comments	N/A	N/A
RIV	Need clarification for second sentence. in Section 02.01.b.	Yes	Comments incorporated (See RII comments above)



COMMENT RESOLUTION [10/2/01]  
71111.15, "Operability Evaluations"

**COMMENT RESOLUTION (September 28, 2001)**  
**IP 71111-16 - Operator Workarounds**

Source	Comment	Modification	Remarks
<i>REGION I COMMENTS (MEMORANDUM DATED 8/28/01 FROM Cliff Anderson)</i>			
	<b><u>IP 71111.16, "Operator Workarounds"</u></b> (Reviewed by Richard Laura, RI, DRP)  No Comments		
<i>REGION II COMMENTS (MEMORANDUM DATED 08/22/01 FROM Leonard Wert)</i>			
Comment #1	<b><u>IP 71111.16, "Operator Workarounds"</u></b>  <b>General Comments:</b>  The procedure is not consistent in that some sections specify reviewing "risk significant" (as defined in Section 3) operator work-arounds; whereas, other sections specify operator work-arounds that could have a "potential effect" (Section 01.01) or "adverse effect" (Section 03.02) on functionality. In addition, Section 02.02 requires an evaluation of the cumulative effect of operator work-arounds (but it is not clear how to do this). A true "cumulative" assessment would not necessarily be limited to risk-significant operator work-arounds. If the review of operator work-arounds is limited to those that are "risk significant" according to the definition in Section 3, very few, if any, would be examined. Is the intent of the procedure to review only risk significant operator work-arounds?	Comment was incorporated.	The IP has been revised to state that there will be two type of reviews. In section 02.01, the review will consist of risk significant operator workarounds who singularly can have a impact on mitigating systems or on human reliability in responding to events. In Section 02.02, the review will be on the combined affects of all relevant operator workarounds whose synergistic effects can affect the response of mitigating systems or on human reliability in responding to events. The remainder of IP was revised accordingly.

COMMENT RESOLUTION [10/2/01]  
71111.15, "Operability Evaluations"

Source	Comment	Modification	Remarks
Comment #2	Section 03.02 Provides some guidance for Inspection Requirement 02.01, but no guidance has been provided for how to accomplish Inspection Requirement 02.02.	Comment was incorporated	Additional guidance was provided to address inspection requirements in Section 02.02.
Comment #3	Section 03.01.d Meaning is not clear.	Comment was addressed in IP.	The wording was revised to state to "Create the potential for a compensatory action to be performed on the wrong equipment or under inappropriate conditions."
Comment #4	Section 02.01.a Is the intent to inspect all risk significant operator work-arounds or only those we identify through other inspection activities?	Comment was not incorporated.	Section 02.01 is for the review of only risk-significant operator workarounds.

COMMENT RESOLUTION [10/2/01]  
71111.15, "Operability Evaluations"

Source	Comment	Modification	Remarks
Comment #5	<p>Section 03.01(2) Licensees do occasionally adopt as permanent an operator work-around via 10 CFR 50.59. Is the purpose to have the inspector evaluate the licensee's process for formally incorporating an operator work-around as a "normal condition"?</p>	Comment was not incorporated.	This IP has as its sole aim to review operator workarounds in regard to their affect on mitigating systems and human reliability in responding to events not the review of other documents or processes that are best examined in other IPs.
<i>REGION III COMMENTS (MEMORANDUM DATED 8/27/01 FROM James Caldwell)</i>			
Comment #1	<p><u>IP 71111.16, "Operator Workarounds"</u></p> <p>Section 02.02 b. removed reviewing the cumulative effects of an operator workaround (OWA) that could increase the initiating event frequency for some accidents. It is unclear based on the change as to why this removal was considered acceptable.</p>	Comment not incorporated.	This procedure is solely concerned with mitigating events not initiating events. So that statement inconsistent with the intent of this procedure as identified in SECY-99-007 was removed.

Source	Comment	Modification	Remarks
Comment #2	This procedure still does not address the issue of what is done when an inspector identifies additional OWAs not identified by the licensee.	Comment not incorporated.	The procedure requires inspector to be cognizant of operator workarounds not identified by the licensee in Sections 02.01 and 03.01 and he is required to take the same actions as for any other operator workarounds identified by inspection activities.
REGION IV COMMENTS (EMAIL DATED 9/06/01 FROM Phillip Harrell)			
	IP 71111.16, Operator Workarounds: This IP is an improvement over the old one. It provides guidance that covers the breadth of possibilities for workarounds. Based on field experience, the new version would have directed us to find the ones that existed here. We have no formal comments.		

**COMMENT RESOLUTION (September 25, 2001)**  
**IP 71111-17 - Permanent Plant Modifications**

Source	Comment	Modification	Remarks
<i>REGION I COMMENTS (MEMORANDUM DATED 8/28/01 FROM Cliff Anderson)</i>			
Comment #1	<p>We suggest replacing the word “periodic” with “annual” in the following sections:</p> <p>“02.02  <u>Inspection Activities</u>  d. <u>Updating Review</u>  (For <del>periodic reviews</del> <b>Annual Reviews</b>, Section 02.02d inspection activity is optional.)</p> <p>02.03  <u>Identification and Resolution of Problems.</u> Verify that the licensee is identifying permanent plant modification issues at an appropriate threshold and entering them in the corrective action program. As it relates to permanent plant modifications, select a sample of problems documented by the licensee and verify appropriateness of the corrective actions. See Inspection Procedure 71152, “Identification and Resolution of Problems,” for additional guidance.</p> <p>(For <del>periodic reviews</del> <b>Annual Reviews</b>, Section 02.03 inspection activity is optional.)</p>	The IP was revised to incorporate the comment.	Periodic reviews were generally replaced by the wording annual reviews to denote a yearly inspection. Therefore the wording here was corrected to agree with that overall philosophy.
Comment #2	<p>71111.17-04                      RESOURCE ESTIMATE</p> <p>The biennial reviews should be performed by <del>delete extra space</del> engineering specialists. Annual reviews could be performed by either a specialist or a resident inspector</p>	Comment was incorporated.	The extra space before the words “engineering specialists” was deleted.

Source	Comment	Modification	Remarks
	periodically during year or at a selected time.”		
<i>REGION ii COMMENTS (MEMORANDUM DATED 8/22/01 FROM Leonard Wert)</i>			
Comment #1	<u>IP 71111.17, “Permanent Plant Modifications”</u>  Procedure is an overall improvement with improved sample size to allow for more detailed review as necessary. Consider an option in the procedure to perform a portion of the biennial review during the outage implementation stage. This could be factored into Section 02.01.	Comment was not incorporated.	In accordance with MC 2515, regional management by its integrated inspection plan determines the allocation of all inspection effort not this IP, which just provides guidance for performing the inspection.
	Section 02.02 a - Add "if necessary" after "included" which makes the pre-visit more optional since probably at least half the sites will not need this. The section currently sounds like the requirement is almost to mandatory	Comment was incorporated.	The words "if necessary" were added after "included" in the 1 <sup>st</sup> paragraph of Section 02.02a.
	Resource Estimate - Clarify charge codes. There should be a 7111117A and 7111117B for the annual and biennial portion.	Comment was not incorporated.	The charge codes are already assigned in IPAS.
<i>REGION iii COMMENTS (MEMORANDUM DATED 08/27/01 FROM James Caldwell)</i>			
	<u>IP 71111.17, “Permanent Plant Modifications”</u>  Region III has reviewed the proposed changes to IP 71111.17, "Permanent Plant Modifications," and had no comments on the changes.		
<i>REGION IV COMMENTS (E-MAIL DATED 9/06/01 FROM Phillip Harrell)</i>			
	No comments		

Comment Resolution (September 19, 2001)  
IP 71111.20, "Refueling and Other Outage Activities"

Source	Comment	Added	Remarks
Region I	Revise Sections 02.03 and 03.03 to further integrate SDP into the procedure objectives.	No	The IP is sufficiently integrated with the Shutdown Operations SDP.
Region I	Continue inspecting activities that could impact the fuel barrier during fuel handling, refueling and subsequent operation.	Yes	These are covered in sections 02.05 and 03.05.
Region II	Level of Effort should state that the inspection is performed on an outage basis, whether for refueling or other outage.	Yes	
Region II	Various editorial changes	Yes	
Region II	Clearance activities should cover removal of tags.	Yes	
Region II	Don't restrict inspection to when licensee has changed instrumentation available to operators.	Yes	
Region II	Delete reference to areas being time sensitive.	Yes	It is obvious to inspectors that some areas must be inspected at specific times.
Region III	Incorrect placement of fuel bundles in the spent fuel pool may cause an inadvertent criticality.	Yes	Section 03.03.g added the following from NUMARC 91-06: "The licensee should have adequate controls during refueling to preclude improper sequencing of control rods or fuel assemblies, which can allow core regions to approach criticality without early detection by a source range monitor."

Comment Resolution (September 19, 2001)  
IP 71111.20, "Refueling and Other Outage Activities"

Source	Comment	Added	Remarks
Regions II and III	Incorrect core reload could result in thermal limits being violated during restart.	Yes	Section 03.05 added the following: "To ensure that the fuel cladding barrier will not be challenged, verify that fuel assemblies were loaded in the reactor core locations specified by the design. This may be accomplished by reviewing videotape and other records of the core loading. Another method is to review physics testing to ensure the testing was adequately conducted and that core operating limit parameters are as predicted by design".
Region III	The IP should clarify whether testing activities during the outage are to be inspected under this IP or others, such as surveillance inspections	Yes	Section 71111.20-04 states: when not related to shutdown risk, inspection of testing activities during the outage should be charged to IPs on post-maintenance and surveillance testing.
Region III	Section 03.04.c concerning mid-loop operation should include review for unexpected RCS inventory changes and verification of an adequate RCS vent path during RCS draining to mid-loop.	Yes	



COMMENT RESOLUTION [9/28/01]  
71111.22, "Surveillance Testing"

Source	Comment	Added	Remarks
RI	Minor Editorial comments	Yes	Comments incorporated
RII	Clarify that the inspection scope is risk-informed	Yes	Comments incorporated
RII	Minor editorial comments	Yes	Comments incorporated
RII	Modify Section 02.01 to review ice condenser system surveillances	Yes	Comments incorporated
RIII	Recommend increasing the quarterly sample size by two	No	There are no comments received from other regions to increase the sample size. Established bands on the required sample sizes. Upper band of the sample size has been increased by two/year .
RIII	Recommend modifying the words in 02.02.a	Yes	Revised to say "under conditions as close as practical to accident conditions or as required by TS"
RIV	No Comments	N/A	

**COMMENT RESOLUTION (August 28, 2001)**  
**IP 71111-23 - Temporary Plant Modifications**

Source	Comment	Modification	Remarks
<i>REGION I COMMENTS (MEMORANDUM DATED 8/28/01 FROM Cliff Anderson)</i>			
	<ul style="list-style-type: none"> <li><b><u>IP71111.23, "Temporary Plant Modifications"</u></b> (Reviewed by Gordon Hunegs, RI, DRP)</li> </ul> <p>No Comments</p>		
<i>REGION II COMMENTS (MEMORANDUM DATED 8/22/01 FROM Leonard Wert)</i>			
Comment #1	<p><u>IP 71111.23, "Temporary Plant Modifications"</u></p> <p>Section 03      Section B states to: "verify that licensee has evaluated the overall impact of the total number of outstanding temporary modifications." This guidance should be clarified or deleted. The current statement does not convey the purpose or criteria to be used to make this inspection.</p>	The IP was revised to address this specific comment.	The following words were added as clarification to Section 03b. "The inspector will determine if the licensee has accounted for any synergistic effects among the outstanding temporary modifications on the safety functions of affected safety systems or on the analyses in Chapter 15 of the FSAR."
<i>REGION III COMMENTS (MEMORANDUM DATED 8/27/01 FROM James Caldwell)</i>			

Source	Comment	Modification	Remarks
	<u>IP 71111.23, "Temporary Plant Modifications"</u>  Region III reviewed the proposed changes to IP 71111.23, "Temporary Plant Modifications," and had no comments on the changes..		
<i>REGION IV COMMENTS (E-MAIL DATED 9/06/01 FROM Phillip Harrell)</i>			
	71111.23, "Temporary Plant Modifications" - No comments.		

COMMENT RESOLUTION 9/26/01  
IP 71152

Source	Comment	Added	Remarks
Region I	Provided a marked up procedure with numerous suggested changes, primarily associated with dividing the procedure into three sections for the routine inspections, sample inspections, and biennial inspection.	x	Procedure was rewritten incorporating the comments provided. The procedure now contains three distinct parts.
Region II	Provided several comments on additional documentation guidance	x	Additional, inspection specific documentation guidance was added for each part of the procedure.
Region II	Provided several comments regarding inspection of safety conscious work environment		These comments are not being incorporated at this time as the subject of how to inspect SCWE will be reviewed by the PI&R focus group.
Region II	Provided other minor comments regarding proposed wording enhancements	x	
Region III	No comments		
Region IV	Comment to change number of samples from 3-6 to 1-6		This comment is not being incorporated as the 3-6 samples were agreed upon by the PI&R focus group. There should be a minimum of 3 samples reviewed per year.
Region IV	Comment to add reference to IP 95001	x	Reference added in several places in the procedure
Region IV	Comment on caution regarding allegations when reviewing SCWE	x	

COMMENT RESOLUTION, September 12, 2001  
IP 71153, "Event Followup"

Source	Comment	Added	Remarks
Region I	No Comments		
Region II	Section 02.02 should not suggest that the LER is the sole source of information for determining if there is a violation or generic issue.	Yes	
Region III	1. Delete references to SDP Phase 2 worksheets in Sections 03.01b and d.	Yes	Replaced the deleted material with guidance from IMC 0609, Appendix A regarding using SDP Phase 2 worksheets to gain qualitative insights into event significance.
Region III	2. Move portions of 03.02, Event Report Review to Section 02.02 since these items are requirements, not guidance.	Yes	Sections 02.02 and 03.02 were revised to clarify requirements and guidance.
Region III	3. Section 03.02 should indicate what the elements of consistency should be between LERs and NRC observations, and what items need to be checked to close an LER.	No	The above revisions emphasize NRC assessing accuracy of LERs and appropriateness of corrective actions. No further guidance is required for these actions. The revision also states that IMC 0610* covers documentation of LER reviews. IMC 0610* states that LER closure is based on engineering judgement.
Region III	4. Appendix B, "Limiting NRC Impact During Events" should be shortened and moved to IMC 2515.	No	We plan to transfer Appendix B to a future IMC which integrates existing and new guidance on good inspector practices.
Region IV	No comments		



Source	Comment	Added	Remarks
Region I	Add words on coordinating augmentation drill	x	
Region I	Suggested adding requirement to inspect interface between licensee and other agencies	x	
Region II	Comment that documentation review should extend beyond last evaluated exercise	x	changed to 2-3 years
Region III	Should include requirement to inspect licensee's self assessment	x	
Region III	Management rather than inspector should request unannounced augmentation test	x	
Region III	Need to add guidance regarding NRC liability if a report in test is asked for		Asking for this test is no different than other activities we ask the licensee to do and therefore no specific NRC liability statement is necessary
Region III	Revise sections 02.06 and 03.06 to indicated that a sample of the EP training lesson plans be reviewed	x	
Region III	Suggested revisions to 02.07, 03.07, 02.08, and 03.08	x	
Region IV	Several minor wording changes	x	
Region IV	Need to clarify documentation requirements in section 01-02	X	

Source	Comment	Added	Remarks
Region IV	Recommendation to move review of plan change history to onsite		Licensee could provide inspectors with the necessary documentation for performing the review prior to onsite inspection
Region IV	Same as last region II comment above	x	
Region IV	Suggestion to remove section 02.08 because there are no inspection requirements		Although there are no inspection requirements in the section, the section does provide an explanation as to why we are not inspecting offsite EP activities.



COMMENT RESOLUTION [9/27/01]

Part 9900, Maintenance- Voluntary Entry Into LCO Action Statements To Perform Preventive Maintenance

Source	Comment	Added	Remarks
RI	1. Draft revision does not provide the inspectors any significant guidance beyond that already contained in Maintenance Rule related documents.	NO	1. The purpose of this revision was to incorporate the Maintenance Rule information in the 9900 guidance while continuing to provide safety principles on voluntary entry into TS.
	2. Draft revision should not discuss "increased risk" and licensee requests for enforcement discretion since this issue is currently under agency review.	Yes and No	2. "Increased risk" was changed to "risk." This revision was not intended to provide any guidance for licensee requests for NOEDs. Refer Part 9900, NOED.TG and enforcement policy Section VII for the guidance. This revision provides a discussion of the 10 CFR 50.65 (a)(4) requirements and the impact on TS AOTs as well as the general safety principles to be considered when performing on-line maintenance.
	3. Part 9900 should be eliminated because it is not entirely consistent with our risk informed approach to inspection.	NO	3. Part 9900 is an effective median to relay guidance to both the NRC staff and the industry. Therefore, this guidance should not be eliminated at this time.

Source	Comment	Added	Remarks
RII	Section C - 4 <sup>th</sup> paragraph contains the phrase “born in mind.” Replace phrase with “noted.”	Yes	Change acceptable and incorporated into the file.
RIII	No Comments	N/A	
RIV	No Comments	N/A	

COMMENT RESOLUTION (10/1/01)  
71111.19, "Post-Maintenance Testing"

Source	Comment	Added	Remarks
RI	Para. 02.02.b. should state that actually witnessing the test is the preferred method for accomplishing the inspection.	Yes	Comments incorporated
RII	No Comments	N/A	
RIII	For a two unit site, the draft procedure gives no guidance relative to splitting PMT observations between units.	Yes	Comments incorporated
RIV	No Comments	N/A	