

December 20, 2004

MEMORANDUM TO: A. Randolph Blough, Director, Division of Reactor Projects, RI  
Victor M. McCree, Director, Division of Reactor Projects, RII  
Steven A. Reynolds, Acting Director, Division of Reactor Projects, RIII  
Art Howell, Director, Division of Reactor Projects, RIV

FROM: Stuart A. Richards, Chief /**RA**/  
Inspection Program Branch  
Division of Inspection Program Management  
Office of Nuclear Reactor Regulation

SUBJECT: DAVIS BESSE LESSONS LEARNED TASK FORCE (DBLLTF)  
RECOMMENDATION 3.3.5(3)

The purpose of this memorandum is to provide you with a status on DBLLTF recommendation 3.3.5(3), "Establish measurements for resident inspector staffing, including the establishment of program expectations to satisfy minimum staffing levels," and to notify you of an impending related change to IMC-0307, "Reactor Oversight Process Self-Assessment Program." IIPB staff worked closely with regional staff in developing this metric, which was designed to capture gaps in permanent staffing at resident sites. We are currently completing pilot testing of this metric with three quarters of the data already available and the expectation that the fourth quarter data will arrive in early January 2005.

We have clarified this metric based on our experience to date and as described in the attachment. The metric is to be implemented as a regular part of the program as of January 2005. We will include the metric with specific examples of different situations which might occur at the sites in the next revision of IMC-0307.

Attachment: As stated - PR-6 "SITE STAFFING"

CONTACT: Fiona T. Tobler, NRR/DIPM  
415-8473

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## PR-6 "SITE STAFFING"

Resident inspector and senior resident inspector site staffing data is intended to measure the permanent inspector staffing levels at each of the reactor sites in order to evaluate our ability to provide continuity of regulatory oversight. For the purpose of the metric, inspectors assigned to the site permanently or through a rotation with minimum duration of 6 weeks shall be counted. Inspectors on 6 week or longer rotational assignments will be identified as such. Inspectors assigned to the site for less than six weeks will not be counted, but should be indicated as such. Additionally, the regions shall indicate sites where permanently assigned resident or senior resident inspectors are away from the site for an extended period of time (one continuous time period which is greater than 6 weeks). Only inspectors who have attained at least a basic inspector certification status, as defined by Inspection Manual Chapter 1245, shall be counted.

The data will be collected during the first week of each month for the previous month by the regions. Data will indicate number of days a qualified resident and senior resident inspector were permanently assigned to the site during the month divided by the number of days in the month. Number of days spent on training; meetings away from the site; participation in team inspections; leave; or other temporary duties (e.g., acting for branch chiefs in his/her absence in the region) will not be counted against the metric unless the absence exceeds 6 continuous weeks. Data for the previous three months will be sent to IIPB during the first week of January, April, July, and October of each year.