

From: <GeorgePannell@aol.com>
To: <nrcprep@nrc.gov>
Date: Tue, Oct 25, 2005 6:15 PM
Subject: Comments to ROP

My comments.

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(3)

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Created By: GeorgePannell@aol.com

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Note: Those who wish to complete this survey anonymously will not receive a direct response from NRC.

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FRN Subject: Solicitation of Public Comments on The 2005 Implementation of the Reactor Oversight Process

QUESTIONS

In responding to these questions, please consider your experiences using the NRC oversight process. Shade in the circle that most applies to your experiences as follows:

1) very much 2) somewhat 3) neutral 4) somewhat less then needed 5) far less then needed

If there are experiences that are rated as unsatisfactory, or if you have specific thoughts or concerns, please elaborate in the "Comments" section that follows the question and offer your opinion for possible improvements. If there are experiences or opinions that you would like to express that cannot be directly captured by the questions, document that in question number 19.

FOR FURTHER INFORMATION CONTACT: Ms. Serita Sanders, Office of Nuclear Reactor Regulation (Mail Stop: OWFN 7A15), U.S. Nuclear Regulatory Commission, Washington DC 20555-0001. Ms. Sanders can also be reached by telephone at 301-415-2956 or by e-mail at SXS5@nrc.gov.

Please send us your response by December 1, 2005, either by postal mail or e-mail:

U.S. Postal System: Michael T. Lesar
Chief, Rules and Directives Branch
Office of Administration (Mail Stop: T6-D59)
Nuclear Regulatory Commission
Washington, DC 20555-0001

Electronically: NRCREP@nrc.gov

Questions related to specific Reactor Oversight Process (ROP) program areas

(As appropriate, please provide specific examples and suggestions for improvement.)

- (1) Does the Performance Indicator Program provide useful insights to help ensure plant safety?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Depends on the rigor and candor used when developing and reporting performance, people still game the system. Process did not catch Davis Besse problem!

- (2) Does appropriate overlap exist between the Performance Indicator Program and the Inspection Program?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Pendulum has once again swung too far away from deterministic evaluations to where everything can be pencil whipped away under the heading of Risk Insights as opposed to a better balance between good engineering and operations practices and risk assessment.

- (3) Does NEI 99-02, "Regulatory Assessment Performance Indicator Guideline" provide clear guidance regarding Performance Indicators?

1	2	3	4	5
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Only as good as the user's implementation!

- (4) Does the Inspection Program adequately cover areas important to safety and is it effective in identifying and ensuring the prompt correction of performance deficiencies?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: It has become too burdensome for inspectors because of the complexity of forms and analysis. Need a better balance between deterministic evaluations and use risk assessment perspective.

- (5) Is the information contained in inspection reports relevant, useful, and written in plain English?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Always too "PC", ask yourself why Davis Besse could happen at this point in time in the industry??

- (6) Does the Significance Determination Process yield an appropriate and consistent regulatory response across all ROP cornerstones?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Great question, I don't think so! What are we really looking for and how soon can you tell?

- (7) Does the NRC take appropriate actions to address performance issues for those plants outside of the Licensee Response Column of the Action Matrix?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: No!!!

- (8) Is the information contained in assessment reports relevant, useful, and written in plain English?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Always too "PC"

Questions related to the efficacy of the overall ROP. (As appropriate, please provide specific examples and suggestions for improvement.)

- (9) Are the ROP oversight activities predictable (i.e., controlled by the process) and reasonably objective (i.e., based on supported facts, rather than relying on subjective judgment)?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Hard to tell!

- (10) Is the ROP risk-informed, in that the NRC's actions and outcomes are appropriately graduated on the basis of increased significance?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Too much gaming of the system and shade tree lawyering! System tends to promote cleverness in responding as opposed to rigorous assessment of situation!

- (11) Is the ROP understandable and are the processes, procedures and products clear and written in plain English?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: No, too complex!

- (12) Does the ROP provide adequate regulatory assurance when combined with other NRC regulatory processes that plants are being operated and maintained safely?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Not necessarily!

(13) Is the ROP effective, efficient, realistic, and timely?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: No! Cumbersome for inspectors, promotes cleverness on the part of the utility in answering versus fixing plant problems. The pendulum has swung too far!!!

(14) Does the ROP ensure openness in the regulatory process?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: No!

(15) Has the public been afforded adequate opportunity to participate in the ROP and to provide inputs and comments?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

(16) Has the NRC been responsive to public inputs and comments on the ROP?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

(17) Has the NRC implemented the ROP as defined by program documents?

1	2	3	4	5
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

(18) Does the ROP result in unintended consequences?

1	2	3	4	5
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Yes, too much analysis too little good engineering and operations.

(19) Please provide any additional information or comments related to the Reactor Oversight Process.

My comments are based on 37 years of experience as a leader in the Nuclear Industry, we need to get the balance right for the next generation of plants and personnel. Remember the initial learning curve, here it comes again. Why didn't the process prevent the Davis Besse situation? If it had gone to the next step (LOCA in the RV head) the industry would never have recovered, how did we get that close with all this great risk analysis stuff? It is still the people and their training that make the difference not a bunch of forms that tend to allow for clever analysis as opposed to rigorous conservative engineering and operations assessment and corrective actions. Make the process as objective and simple as possible with Nuclear Safety in the front of everyone's mind!!!

Dated at Rockville, Maryland, this 14th day of October 2005.

For the U.S. Nuclear Regulatory Commission

/RA/

Stuart A. Richards

Office of Nuclear Reactor Regulation
Division of Inspection Program Management
Inspection Program Branch