

**From:** "Tom Gurdziel" <tgurdziel@twcny.rr.com>  
**To:** <NRCREP@nrc.gov>  
**Date:** Wed, Oct 26, 2005 8:12 AM  
**Subject:** Survey

**CC:** "David Lochbaum" <dlochbaum@ucsusa.org>, "Ed Stronski" <ESTRONSKI@aol.com>

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**Subject:** Survey  
**Creation Date:** Wed, Oct 26, 2005 8:12 AM  
**From:** "Tom Gurdziel" <tgurdziel@twcnny.rr.com>

**Created By:** tgurdziel@twcnny.rr.com

**Recipients**

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ESTRONSKI CC (Ed Stronski)

ucsusa.org  
dlochbaum CC (David Lochbaum)

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rop2005survey.doc	72192	
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**Options**

**Expiration Date:** None  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Participant Name: Thomas Gurdziel**

**Company:**

**Address: 9 Twin Orchard Drive, Oswego, NY 13126**

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

**E-mail Address: tgurdziel@twcny.rr.com**

**Phone Number:**

**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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- (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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- (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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- (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 type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: For example, at Davis-Besse, nobody noticed the buildup of boric acid residue on the ventilation plenum or, if they did, nobody considered it an important sign of (unidentified) reactor coolant leakage, even though it took 15 - 5 gallon containers to eventually remove it. (The actual hole through the plenum metal apparently wasn't a sign, either.) After the 0350 committee got this place straightened out, a Lessons Learned item remained: it was that the

ASME requirements for acceptable pressure vessel leakage was too lenient. Today, to the best of my knowledge, this item still remains completely unaddressed.

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

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

Comments: I don't like having information on a single problem spread out over 2 or 3 sections in the report, though. Also, it is impossible to determine what section you are reading from.

- (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 type="checkbox"/>	<input type="checkbox"/>

Comments:

- (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 type="checkbox"/>	<input checked="" type="checkbox"/>

Comments: Example: the use of OI and DOJ at Davis-Besse to prosecute criminal charges has been a multi-year exercise in futility. At Perry, a mainly unsuccessful plant performance improvement initiative simply results in the promise of improvement under "Phase 2", all the while running the plant at full power. Same thing at Hope Creek: why shut down for 6 weeks to replace a generally acknowledged cracked reactor recirculation pump shaft when you have already been allowed to run it 50,000 hours BEYOND the recommended inspection time (of 80,000 hours)?

- (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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

**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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

- (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 type="checkbox"/>	<input type="checkbox"/>

Comments:

- (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 type="checkbox"/>	<input type="checkbox"/>

Comments:

(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 type="checkbox"/>	<input type="checkbox"/>

Comments:

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

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

Comments:

(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 type="checkbox"/>	<input type="checkbox"/>

Comments:

(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 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 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

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

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