

From: OPA1
To: NRCREP@nrc.gov
Date: Wed, Oct 26, 2005 9:39 AM
Subject: Fwd: General Comments on ROP

This was received via the OPA mailbox on the web site. I'm just assuring it arrived at the proper destination. If this is a duplicate, please disregard.

10/21/05
70 FR 61318
(5)

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2005 OCT 26 AM 10:32

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E-RIDS=ADM-03

Cdd = G. Sanders (SX55)

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Subject: Fwd: General Comments on ROP
Creation Date: Wed, Oct 26, 2005 9:39 AM
From: OPA1

Created By: OPA1@nrc.gov

Recipients

nrc.gov

twf2_po.TWFN_DO

NRCREP (NRCREP@nrc.gov)

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twf2_po.TWFN_DO

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Files

MESSAGE

Mail

Size

498

Date & Time

Wednesday, October 26, 2005 9:39 AM

Options

Expiration Date:

None

Priority:

Standard

Reply Requested:

No

Return Notification:

None

Concealed Subject:

No

Security:

Standard

From: "Tom Gurdziel" <tgurdziel@twcny.rr.com>
To: <opa@nrc.gov>
Date: Wed, Oct 26, 2005 8:33 AM
Subject: General Comments on ROP

Good morning,

You may note that the action party for my comments about acceptable pressure vessel leakage for question 4 is not a plant operating organization but actually the NRC.

Thank you,

Tom Gurdziel

CC: "David Lochbaum" <dlochbaum@ucsusa.org>, <opa1@nrc.gov>, <opa3@nrc.gov>,
"James M. Trapp" <jmt1@nrc.gov>

Mail Envelope Properties (435F7787.89A : 14 : 26778)

Subject: General Comments on ROP
Creation Date: Wed, Oct 26, 2005 8:32 AM
From: "Tom Gurdziel" <tgurdziel@twcnny.rr.com>

Created By: tgurdziel@twcnny.rr.com

Recipients

nrc.gov

kp1_po.KP_DO

JMT1 CC (James Trapp)

OPA1 CC

nrc.gov

ch_po.CH_DO

OPA3 CC (OPA3 OPA - Region III)

nrc.gov

owf1_po.OWFN_DO

OPA ()

ucsusa.org

dlochbaum CC (David Lochbaum)

Post Office

kp1_po.KP_DO

ch_po.CH_DO

owf1_po.OWFN_DO

Route

nrc.gov

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Files

MESSAGE

rop2005survey.doc

Mime.822

Size

233

72192

100814

Date & Time

Wednesday, October 26, 2005 8:32 AM

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