

## MANUAL CHAPTER 0350 PANEL PROCESS PLAN Fort Calhoun Station

This document outlines the NRC's Inspection Manual Chapter (IMC) 0350 Panel Process Plan. The Process Plan details how the IMC 0350 Oversight Panel, "Panel", conducts oversight activities at Fort Calhoun Station. The Process Plan ensures that the Panel has guidance for anticipated tasks and coordinating NRC inspection activities. The Restart Checklist will contain the specific issues subject to NRC review. At a minimum, the Restart Checklist will contain the items from the Confirmatory Action Letter (CAL 4-11-003), safety significant issues, safety culture assessments, and extent of cause/extent of condition reviews. Addition of issues to the checklist will consider inspection inputs and all preliminary safety significant items.

### **I. Verification of appropriate agency response**

1. (Region IV/Plant Branch F [PBF]) Verify that the IMC 0350 entry conditions have been met.
2. (PBF) Modify the restart Confirmatory Action Letter (CAL), as appropriate.
3. (Region IV/Engineering Branch 2) Issue special inspection report involving the June 7, 2011 fire in the 480V safety related switchgear.
4. (PBF) Verify the basis for the management decision to place the plant in the IMC 0350 process is documented.
5. Verify a written letter was provided to the licensee notifying it of the NRC's plans and basis to implement the IMC 0350 process.

### **II. Verification of appropriate notifications utilizing Communications Plan**

PBF to verify the following communications were completed:

- a. Commissioner assistants' briefings
- b. Cognizant Federal agencies
- c. State and local officials
- d. Congress
- e. News media

### **III. Establishment and organization of the NRC review process**

1. (Regional Administrator) Establish the oversight panel (Regional Administrator, Region IV)

2. (PBF) Establish a Panel Charter and modify (as necessary).
3. (Oversight Panel) Assess available information (e.g., performance indicator [PI] data, baseline and supplemental inspection findings, results of risk studies and event analyses, licensee self-assessments, allegations, performance improvement plan, and industry reviews, lessons learned reports and other third party reports). This information will be retrievable via the FCS Sharepoint Site (<http://portal.nrc.gov/edo/riv/drp/FCS/default.aspx>) and the Public website (<http://www.nrc.gov/info-finder/reactor/fcs/special-oversight.html>)
4. (Oversight Panel) Develop, modify as necessary, and implement the Restart Checklist.
5. (Regional Administrator, Region IV/Director, Office of Nuclear Reactor Regulation [NRR]) Approve the Restart Checklist.
6. (PBF) Develop and maintain a comprehensive Communications Plan.
7. (Oversight Panel) Determine the inspection necessary to review performance deficiencies and identified risk-significant issues for restart.
8. (Oversight Panel) Issue and maintain a comprehensive inspection schedule.
9. (Oversight Panel) Obtain input from involved parties both within the NRC and at other Federal agencies.
10. (Panel Chairman) Conduct periodic Regional Administrator briefings.
11. (Panel Chairman/Vice Chairman) Conduct periodic NRR Executive Team briefings.
12. (Panel Chairman/Vice Chairman) Conduct periodic Executive Director of Operations (EDO) briefings, if requested.
13. (Oversight Panel) Conduct public meetings with the licensee on an approximately monthly basis to discuss progress toward satisfactory completion of the licensee's restart program.
14. (Oversight Panel with Region IV Regional Administrator approval) Modify the CAL as necessary .
15. (PBF) Support senior manager site visits.
16. (PBF) Establish accounting codes for NRC staff.

17. (Oversight Panel) Develop the plant-specific criteria for termination of the IMC 0350 process controls and modify as necessary

#### **IV. Assessment of licensee performance**

1. (Oversight Panel) Evaluate NRC inspection findings performed after formation of the Panel.
2. (Oversight Panel) Evaluate the licensee's performance improvement plan and associated root cause determination, extent-of-condition reviews, and corrective action plans. These reviews should consider both the technical soundness of the licensee's evaluations and management's commitment to performance improvement.
3. (Oversight Panel) Evaluate allegations involving reactor safety, radiation safety, or security. Any allegations determined to have merit and risk significance should be included on the Restart Checklist.
4. (Oversight Panel) Perform a review of backlogged maintenance, engineering, and corrective action work items to determine their significance with the assistance of a Senior Reactor Analyst.
5. (Oversight Panel) Assess the licensee's third party evaluation of their safety culture, and independently perform an assessment of the licensee's safety culture using the guidance contained in Inspection Procedure 95003.
6. (Oversight Panel) Provide for solicitation of stakeholder comments throughout the duration of the IMC 0350 process. Sources to consider include:
  - a. Public
  - b. State and local officials
  - c. Federal agencies
  - d. 10 CFR 2.206 petitions
  - e. NRC staff
7. (Oversight Panel) Evaluate the licensee's restart readiness self-assessment.
8. (Oversight Panel) Verify that licensee has completed actions to resolve all restart issues described in the Restart Checklist.
9. (Oversight Panel) Complete NRC restart readiness team inspections.
10. (PBF) Develop restart coverage inspection plan.

11. (Oversight Panel) Determine that all conditions of the restart CAL are satisfied. If applicable, the NRC and the licensee should clearly understand what actions remain to be completed and how the licensee will demonstrate their completion.
12. (Oversight Panel) Issue a long-term improvement CAL.
13. (Oversight Panel) Verify that required restart issues in the Restart Checklist are complete.
14. (Oversight Panel) Conduct a public meeting with the licensee to discuss restart readiness.

## **V. Restart authorization**

1. (Oversight Panel) Prepare the restart recommendation memorandum to the Regional Administrator and the restart authorization letter to the licensee establishing the basis for restart.
2. (Oversight Panel) Identify and disposition any restart concerns from the region, NRR, or other applicable Headquarters offices or Federal agencies.
3. (Oversight Panel) Obtain approval of the Regional Administrator and the concurrence from the Director of NRR for restart.
4. (Region IV Regional Administrator) Obtain concurrence for restart from the Deputy Executive Director for Reactor and Preparedness Programs.
5. (Oversight Panel) Conduct a briefing for the Advisory Committee on Reactor Safeguards (ACRS), if requested.
6. (Oversight Panel) Conduct a briefing for the Commission, if requested.
7. (Region IV Regional Administrator) Authorize restart of the facility.
8. (Oversight Panel) Conduct an informational brief for the Commission Technical Assistants.
9. (PBF) Modify the long-term improvement CAL, as appropriate.

## **VI. Notification of restart authorization**

(PBF) The regional office should ensure the following are notified of the restart authorization:

- a. Commission
- b. Office of the Executive Director of Operations (EDO)
- c. Office of Congressional Affairs (OCA)
- d. ACRS
- e. Applicable Federal agencies
- f. Office of Public Affairs (OPA)
- g. State and local officials
- h. Congress
- i. Media
- j. Citizens or groups that expressed interest during the restart approval process

## **VII. Post-restart oversight**

1. (PBF/Oversight Panel) Issue an inspection plan for at least 18 months following restart, even if the post-restart oversight period is less. Include inspections in areas not covered by the PIs and that are beyond the normal baseline inspection program.
2. (Oversight Panel) Determine if adjustments are needed to the level of required inspection oversight on a quarterly basis.
3. (Oversight Panel) Monitor licensee performance to assess whether corrective actions implemented since startup were effective to prevent recurrence of problems.
4. (Oversight Panel) Review docketed correspondence, performance improvement plan changes, long-term corrective actions, and licensee self-assessments for those issues not implemented before restart.
5. (Oversight Panel) As appropriate, conduct public meetings with the licensee to discuss performance improvements.

## **VIII. Termination of the IMC 0350 process**

After an acceptable post-restart period of operation of the plant, and upon determination that the criteria for termination of the IMC 0350 process controls as defined in the Panel Process Plan have been met, the Panel may recommend termination of the IMC 0350 process and a return to IMC 0305, the Reactor Oversight Process (ROP). The criteria for termination of the IMC 0350 process include verification that the licensee has established an effective long-range improvement program, is sufficiently implementing the corrective action program, has demonstrated safe plant operation, overall improving performance, and has adequate controls in place to address the plant specific issues that caused IMC 0350 to be implemented.

1. (Oversight Panel) Provide a written recommendation to the Regional Administrator and the Director of NRR to return the plant to the routine oversight and assessment of the ROP. The letter should address the resolution for each of the plant-specific criteria for termination of the IMC 0350 process as defined in the Panel Process Plan.
2. (Region IV Regional Administrator) Approve return to the routine oversight and assessment of the ROP and terminate the IMC 0350 oversight process.
3. (Region IV Regional Administrator) Provide a written letter notifying the licensee that the plant has returned to the routine oversight and assessment of the ROP. The letter should include: (1) the effective date and the basis for the decision to return the plant to the ROP; (2) the disposition of all greater-than-green findings identified before or during the IMC 0350 process; (3) an explanation as to the appropriate Action Matrix column that will dictate future NRC actions (based on current PIs and open inspection findings); (4) a summary of events and actions to date, from problem discovery through post-restart activities; (5) a summary assessment of the resolution of the Restart Checklist issues; (6) the status of all conditions of the confirmatory action letter, including any ongoing commitments; and (7) the planned inspections at the site for the next 18 months under ROP oversight.