

Public Meeting on Backfitting Led by CRGR
September 13, 2016



Regulatory Challenges During Inspections

Not a “volume” problem

- **Several high profile backfits compliance capture attention**
- **5 from 2011 to 2015....**
- **Inspections contain numerous backfits**
 - some get to TIA space and ruled backfits
 - DC Cook 2005 (UV/DV design)
 - Palisades 2008 (Fast Transfer Scheme)
 - Fermi – 2008 (UV/DV design)
 - Hatch 2011 (UV/DV design)
 - Perry 2016 (UV/DV design)??
- **Most do not, and here lies the problem**

Words are Powerful

- **Inspectors seldom say backfit**
- **Backfit is common point of discussion behind the scenes of senior plant management**
- **Attempts at claiming backfit before inspection Exit mtgs often met with dismissiveness**
 - Unsure what happens behind scenes at NRC
 - Informal claims feel threatening both ways
- **Alienating the Inspector are real concerns**
 - Informal use of “NRR Concurs”

Issues That Changed Operations, Design, Procedures

- **Operation that could Potential Drain Reactor Vessel (OPDRV)**
- **RIS + EGM for Tornados (initially)**
- **Flooding 50.54(f)**
- **Recent NFPA-805 and Incipient Fire Det**
- **Perry GDC-17 and UV/DV Circuitry**
- **Perry Unit 1 Start Up Transformer and GDC-17**

Going Forward Considerations

- **Most plants are 40+ years in operation**
 - Numerous design-related inspections
 - Many went through some type of design basis reconstitution project
 - License Renewal process
- **Do we have “reasonable assurance” that our plant designs are adequate?**
- **Would it be better served to focus plant safety inspections on maintenance of design basis and improving safety?**
- **If indications of a weakness in a design attribute surface, would this be a better use of design inspection resources?**

Going Forward

- **CRGR should not be involved with every design related inspection finding.**
- **NRC inspectors applying today's desires for detail and documentation on engineering judgement of 1970's vintage documentation.**
 - Address in training and expectations
- **Focus should be on looking toward safe future operation.**
- **There should be an easy, rapid process to adjudicate backfit claims from inspections that are below the level of what we now call backfits.**

